

Whistleblower policy

Van Loon Group strives for a corporate culture in which malpractices are prevented, and in which measures are taken to reduce the likelihood of incidents and to reduce risks. We believe it is important that employees can adequately and safely report any suspicions of malpractices within the company. To give employees this opportunity, we have established the whistleblower policy. Below you can read how the Van Loon Group whistleblower policy is implemented. This is about reporting any malpractices, and the regulations in place to do so. We refer to the Dutch Whistleblower Protection Act.

Malpractices and/or irregularities covered by this whistleblower policy include, but are not limited to, the following:

- Non-compliance with laws and regulations;
- Consumer food safety is at stake;
- The general safety of consumers is at stake;
- Human rights in the most general sense;
- Product integrity is at stake: products do not comply with what is written on the packaging or communicated to customers;
- An imminent danger to the proper functioning of the organisation as a result of negligence or improper handling.

Confidentiality and anonymity

All reports are treated confidentially. If you report a violation to the external confidant or the product integrity officer, your identity will be known to them. The external confidant or product integrity officer is prohibited from disclosing your identity without your consent, except in the following cases:

- if legally obliged to do so;
- in the case that the report was not made in good faith;
- if required to do so in view of a substantial public interest.

If the failure to disclose the reporter's identity impedes, complicates or hinders the investigation, the reporter will be asked to agree to the disclosure of their identity. When the identity of the reporter is disclosed, the relevant information will be entrusted only to those who need it for the assessment of the report.

Internal whistleblower policy

You can report alleged malpractices to your immediate supervisor. In this situation, the supervisor must take appropriate action.

If, for whatever reason, it is not reasonably possible or appropriate to inform the supervisor, you have the option to report directly to the external confidant, the product integrity officer or Group Management.

Management has given the designated external confidant or product integrity officer the authority and obligation to investigate each complaint and to take appropriate actions in the manner they deem wise.

All reports to the product integrity officer are recorded using a reporting form, and are verified and evaluated annually during management reviews.

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Where can you report what?

- **Product integrity officer**
 You can approach this person for malpractices and/or irregularities around product integrity or food safety, and when you do not feel it is appropriate to report the matter to your line supervisor/supervisors.

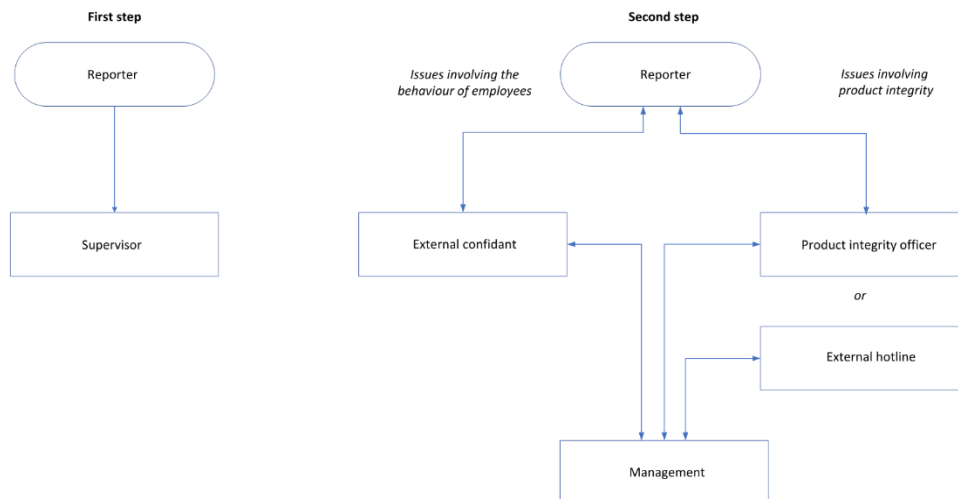
- **External confidant**
 Two external confidants have been appointed within the organisation to whom employees can go to discuss any concerns or violations, or reasonable suspicion thereof, 'without naming names'. You can approach the external confidants with malpractice and/or irregularities concerning employee behaviour. For some specific forms of unwanted behaviour, there is also a Procedure Unwanted Behaviour against aggressive and violent behaviour, and harassment, sexual or otherwise.

- **Joint Works Council**
 General points about company policy.

External whistleblower policy

In addition to the above policy, the Group Management also offers its employees the opportunity to report malpractices to an external, independent hotline. If employees so wish, they can do this anonymously. Reports will be investigated by this hotline and passed directly on to the Group Management of the Van Loon Group. Feedback can be given on the report, which the reporter can request anonymously from the hotline.

The reporting and handling structure is as follows:



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Report and response

The contact details of the external confidant, product integrity officer, Group Works Council members and the external hotline can be found on Meatpoint, the notice boards at your location, and can be requested from HR.

You can report a violation, or reasonable suspicion thereof, to the external confidant by telephone or email, and to the product integrity officer in person, either in writing, by telephone or by email.

You also have the option of consulting an adviser in confidence about suspected malpractice.

To enable the recipient to assess the case, try to make the information you provide as detailed as possible,. Consider the background, history and reason for your concern, as well as names, dates, places and other information.

The external confidant and the product integrity officer acknowledge receipt of a report. They will send a summary report (reporting form) of the report to the reporter within 7 working days.

The external confidant or product integrity officer will send the reporting form with their assessment of the case to the Group Management within 3 weeks.

The Group Management will immediately begin reviewing and investigating the reported violation. Within a period of 8 weeks after the report is filed, the reporter will be informed in writing of the status of the reported violation by the person they initially reported it to.

Preventing punitive or unfair treatment

Punitive or unfair treatment in response to concerns raised in good faith will not be tolerated by Van Loon Group. Employees who report a violation will be protected and will not be disadvantaged in any way as a result of their report. If the reporter is punished or treated unfairly by a particular person, that person in question will face consequences.

Abuse of the whistleblower policy

Van Loon Group assumes that employees will raise their concerns in good faith. If investigations cannot find confirmation of particular concerns, or if they are found to be incorrect, no action will be taken against employees who have raised concerns in good faith.

Only if employees deliberately file reports that they know or are expected to know are incorrect, there can be consequences for the employee in question.

Implementation

The Group Management and Division Managers are responsible for:

- the implementation of the whistleblower policy through mandatory training in Learn-it;
- effectively communicating this to all employees by including it in the employee handbook;
- creating the conditions necessary where nothing reasonably prevents an employee from reporting malpractices or violations, or reasonable suspicion thereof.

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The Division Managers will take at least the following actions:

- inform all employees of the existence of the procedure, including the content of the procedure, relevant names and addresses, telephone numbers and email addresses;
- appoint one or more trusted confidants and product integrity officers within the organisation;
- provide the confidants, product integrity officers and management with the appropriate instructions for the correct implementation of the procedure.

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