Wollux Whistleblower Policy

Purpose Policy

Wollux's goal is not only to comply with the applicable laws, rules, and regulations of the various countries in which we operate, but also to act responsibly, honestly, and ethically in all respects.

As a company, we value transparency, integrity, and recognize the importance of our employees, partners, and everyone associated with Wollux. Therefore, it is essential to provide a safe and accessible way to report any dangerous, unethical, or illegal practices that fall under the responsibility of the employer.

This policy is not intended for personal grievances or individual conflicts, such as disagreements between an employee and a supervisor.

The Whistleblower Policy forms part of the Wollux Code of Conduct and complies with relevant EU and national legislation, including the protection of individuals who report violations in good faith.

Scope

This Whistleblower Policy applies to the entire Wollux organization across its European entities and is designed to enable the effective reporting of serious concerns related to one or more of the following matters that affect Wollux:

- Criminal offenses or misdemeanors
- Violations of applicable laws, regulations, and/or international treaties
- Breaches of Wollux's contractual obligations
- Violations of the Wollux Code of Conduct and/or other company policies
- Any other form of dishonest or unethical behavior

The above-mentioned categories are hereinafter referred to as **"misconduct."**

All employees and persons working for Wollux, as well as third parties with a reasonable suspicion of misconduct, may use this Whistleblower Policy to report their concerns.

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Terms & Conditions - Agreements

1. *Reporting misconduct*

In accordance with Wollux's open-door policy, individuals are encouraged to use regular internal channels as a first step—such as reporting to a manager, Human Resources, a confidential advisor, or a member of the management team.

If this is not feasible or appropriate, Wollux has established an internal Whistleblower Channel that allows anyone to report misconduct directly to the Ethics Committee.

Reports to the Ethics Committee can be submitted in the following ways:

- By letter (anonymous reporting allowed):
  Ethics Committee
  Kasteellaan 184-190
  7700 Moeskroen
  Belgium
- Via internal mailbox:
  A written note submitted through the secure mailbox at the site, adressed at Ethics Committee.

Within the European Union, whistleblowers also have the right to report misconduct that falls under the scope of Directive (EU) 2019/1937 to a local competent authority responsible for handling whistleblower reports. This is referred to as an external report.

A report must be sufficiently detailed and documented, and must therefore include the following information:

- Your name and your relationship to **Wollux**, as well as your contact information (unless you choose to remain anonymous).
- Your role or involvement in the incident being reported.
- A detailed description of the incident or breach, including time, date, and location of any specific occurrences.
- The names and contact details of other individuals who witnessed or have further information regarding the situation.
- Any known previous, similar incidents involving the same individual(s).
- Any supporting documents or other relevant materials related to the report.

Whistleblowers are free to report misconduct in the language of their choice. As a whistleblower, you have the right to remain anonymous, and confidentiality and/or anonymity will be fully respected.

The reporting person will hereinafter be referred to as the **whistleblower**.

2. *Processing a Report of Misconduct*

2.1. Investigation of the Report

Each report will be reviewed to determine whether it falls within the scope of the Wollux Whistleblower Policy. If the report is found to be outside the scope, it will be rejected, and the whistleblower will be redirected to the appropriate department within Wollux.

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For non-anonymous reports, an acknowledgement of receipt will be sent within seven (7) days of receiving the report.

2.2. Investigation of the Report

If the report is accepted, the **Ethics Committee** will initiate an investigation. Within three (3) months of the report's acceptance, the whistleblower will be informed of the status of the investigation.

While the whistleblower has the right to be informed of the investigation's progress, they are not entitled to the full content of the findings.

The Ethics Committee may contact the whistleblower for further clarification or evidence. If necessary, external experts (e.g., consultants, investigative bodies, or accounting firms) may be engaged to support a thorough and confidential investigation.

For non-anonymous reports, an acknowledgement of receipt will be sent within seven (7) days of receiving the report.

2.3. Termination of the investigation

At the end of the investigation, the Ethics Commission draws up a summary report with a description of the investigative measures carried out. At the end of the investigation, a written explanation of the decision of the investigation, regardless of the outcome, is sent to the whistleblower (for non-anonymous reports).

2.4. Confidentiality of the Report

The identity of the whistleblower will be protected in accordance with applicable laws. It will not be disclosed without explicit consent, except to those specifically authorized to manage the report. This also applies to all information that could directly or indirectly reveal the whistleblower's identity.

Identity disclosure is only permitted when required and proportionate, under European or national law, as part of investigations by competent authorities or judicial proceedings.

2.5. Record Keeping & Commitment

Each report is documented in a secure register, accessible only to authorized individuals. Investigation reports and supporting documentation are retained for a minimum of five (5) years following the conclusion of the investigation.

3. Whistleblower protection

Whistleblowers are protected under this policy if they had reasonable grounds to believe that the information reported was accurate and that it fell within the policy's scope. Protection is not forfeited if the report turns out to be incorrect or unfounded.

The same protection applies to third parties and legal entities associated with the whistleblower, provided they had reasonable grounds to believe the whistleblower was acting in good faith.

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This protection begins at the moment the misconduct is reported.

4. Misuse of the Whistleblowing System

Any knowingly false or malicious reports—those made in bad faith—may lead to disciplinary action and/or legal consequences, in accordance with applicable national law

5. Final Provisions

Wollux reserves the right to amend this policy as needed to reflect changes in law or company operations.

Exceptions to this policy are rare. If an exception is requested, it must be explicitly submitted, discussed, and approved.

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