



WHISTLEBLOWING POLICY

AVR strives to uphold the highest standards in business ethics and comply with the applicable legislation and regulations. That is why it is important to make it possible to report any concerns about actual or suspected misconduct within the operational management of AVR. This policy is in keeping with AVR's values and vision.

GOALS AND SCOPE OF THE POLICY

This whistleblowing policy (hereafter: Policy) has been established in order to create a framework within which employees can effectively report serious concerns regarding one or more of the following topics, which impact AVR:

- a criminal offence or violation;
- a breach of existing laws and regulations and/or international treaties;
- a breach of AVR's contractual obligations;
- a breach of AVR's code of conduct and/or other policies and procedures;
- any other form of unethical or dishonest behaviour

(hereafter: the misconduct).

This policy applies to AVR, including its subsidiary, branches and affiliate companies and joint ventures, together 'AVR' or 'the company'.

This policy applies to all employees, any other person working for AVR and any third party harbouring reasonable suspicions of misconduct in connection with AVR. A person who reports such misconduct will hereafter be designated the 'Whistleblower'.

The implementation of this policy is subject to all legal restrictions or rights resulting from any jurisdiction in which the company is active. Local national laws apply in the event of any conflicts or inconsistencies between the policy and local legislation or regulations.

REPORTING MISCONDUCT

First of all, prior to reporting any instance of misconduct under the terms of this policy, all persons are strongly encouraged to go through the normal reporting channels (i.e. immediate superior, confidential advisor, HR, delegate or a member of management they feel comfortable with).



As a second option, if a person thinks the above channels do not suffice, AVR has created an in-house whistleblowing channel where anyone can report misconduct to the central reporting person and AVR's Ethics Committee.

Misconduct can be reported to the Ethics Committee:

- by letter (for anonymous reports): Ethics Committee – Meensesteenweg 545 8800 Roeselare
- by email: AVRethics@Avr.be

Internal reporting is the most efficient way of enabling AVR to thoroughly investigate the matter and take appropriate measures in response to the misconduct.

However, in the European Union a whistleblower also has the option of reporting a breach that falls within the scope of application of Directive (EU) 2019/1937 to a local competent authority, responsible for receiving and investigating whistleblower reports (external reports).

When submitting a report, a whistleblower must always act in good faith and exercise due diligence to guarantee the accuracy of the information.

A report must be sufficiently detailed and documented and must (if the whistleblower possesses the relevant information) contain the following:

- Date, time and place of the occurrence;
- The names of those involved, their role or other information that makes identification possible;
- The names of any other persons who can confirm the reported facts;
- A detailed description of the occurrence;
- All other information or elements that may help the investigation team verify the facts.

Whistleblowers are free to submit a report in the language of their choice.

When a whistleblower reports misconduct, he/she has the right to anonymity and that confidentiality and/or anonymity will be upheld unless we are under a legal obligation to reveal this person's identity. However, it is usually easier to conduct a full and fair investigation into the report submitted by the whistleblower if he/she announces their identity.



PROCESSING A REPORT OF MISCONDUCT

In the event of a non-anonymous report, the whistleblower will receive confirmation of receipt within seven days of submitting the report.

Reports containing enough detailed information or documentation and that are therefore considered sufficiently serious, will be investigated. In the event of an anonymous report, the initial phase will address the credibility of the concern and the likelihood of the confirmation of the accusation by reliable sources.

If an internal investigation is launched, the Ethics Committee will put together an investigation team to look into the alleged misconduct. To avoid any conflict of interest, persons involved in the misconduct reported by the whistleblower are excluded from the investigation team and are also prohibited from having any part in the evaluation of the report or in determining what action should be taken. In so far as possible, a member of the union delegation will be invited to be part of the investigation team. In the event of extremely complex, urgent and sensitive reports, outsourcing to a reliable external and independent third party may be justified to ensure the confidential nature of the investigation. If so, the whistleblower shall be notified at the earliest opportunity.

All internal and external parties involved in the investigation and any follow-up actions are bound by strict obligations of confidentiality. The unwarranted publication of information regarding the investigation, the report or the whistleblower's identity, shall not be tolerated and will result in disciplinary measures. Depending on the circumstances, such behaviour may also result in further steps, including civil or criminal prosecution.

The identity of the whistleblower and other involved parties shall not be disclosed unless a necessary and proportionate obligation exists based on laws and regulations. In this case the whistleblower is informed in writing of the reasons for the disclosure of the confidential information. However, the reasons for the disclosure will not be explained if this information could jeopardise the related investigations or legal procedures.

The investigation team may contact the whistleblower to obtain additional information and/or evidence with regard to the misconduct. External parties (e.g. external advisors, research agencies, accounting agencies, etc.) may be involved where necessary to ensure a thorough and confidential investigation.



At the conclusion of the investigation, the investigation team will draw up a summary report detailing the course of the investigation. In order to arrive at a final decision, a non-confidential and anonymised version of this summary report may only be shared outside the investigation team on a need-to-know basis.

The investigation team will make a final decision on whether or not the misconduct is deemed proven and will define the relevant actions necessary to put an end to the misconduct and protect the company. A member of the investigation team compiles a final report together with a description of the facts and the eventual decision:

- If the misconduct is deemed proven, relevant actions will be defined with a view to ending the misconduct and protecting the company; or
- If the investigation shows there is no or insufficient evidence of the misconduct, no further action will be undertaken.

When the investigation is concluded, the investigation team will notify a written explanation of the decision to the whistleblower (for non-anonymous reports), regardless of the outcome. No later than three months after acknowledgement of receipt, the whistleblower will receive feedback on the ongoing or concluded investigation into the report.

PROTECTION OF WHISTLEBLOWERS

Whistleblowers are protected on condition that they had reasonable grounds to assume that the reported information regarding misconduct was accurate at the time of the report and that the information fell within the application scope of this policy. The whistleblower shall not lose his/her protection just because the report was found to be inaccurate or unfounded.

Third parties (e.g. colleagues or family members) and legal entities associated with the whistleblower are likewise protected if they had reasonable grounds to assume the whistleblower was covered by the protection.

The protection takes effect as soon as the misconduct is reported.

Any form of retaliation against the whistleblower, third parties and legal entities associated with the whistleblower shall not be tolerated, including:

- suspension or dismissal;
- demotion or being passed over for promotion;
- amendment of the terms of employment;



- denial of access to a training course;
- negative evaluation;
- imposing (a) disciplinary measure(s);
- coercion, bullying, intimidation and exclusion.

AVR will take appropriate measures against anyone who retaliates or threatens to do so.

Following his report, if the whistleblower realises he/she made a mistake and the allegations are unfounded, he/she must inform the Ethics Committee at the earliest opportunity. The whistleblower will not suffer any negative consequences if the report was submitted in good faith, i.e. without malicious intent or in a selfless way.

MISUSE OF CHANNELS TO REPORT MISCONDUCT

Any unfounded report or report proven to be made in bad faith (i.e. intentionally making false or misleading accusations) exposes the whistleblower to disciplinary sanctions and/or legal prosecution, depending on the applicable national laws and regulations.

STORAGE

Every report is kept in a register that is treated with strict confidentiality at all times and is only accessible to authorised persons. With oral reports, the notification can be recorded in a report or a recording of the conversation may be kept in the register. The whistleblower may check and correct the written report of the interview and subsequently sign it for approval.

Research reports and supplementary information is always stored for up to five years following the conclusion of the investigation.

PROTECTION OF PERSONAL DATA

All reports, related information and personal data of the whistleblower and the persons involved in the report will be treated in a confidential and privacy-sensitive way as long as this does not obstruct or interfere with the investigation of any government body.

Personal data of a person implicated in the report shall not be divulged, except to a judicial body, until the complaint has been upheld.



When an internal investigation, disciplinary or legal procedure is ongoing, data is retained until the conclusion of these proceedings and for as long as legally required.

Whistleblowers can request at all times to communicate with the investigation team to obtain information about personal data that has been recorded. The whistleblower may request access to his/her personal data, as well as rectification or deletion of inaccurate data on condition that their processing is no longer necessary within the context of the investigation or in the event that the data subject withdraws his/her consent and there is no other legal basis for the processing.