

# Speak Up Policy





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# Introduction

Anyone who obtains information on abuses in a work-related context, including employees, former employees, job applicants, volunteers, trainees, self-employed persons working for DEPT®, shareholders, and members of the management and supervisory body of DEPT® (hereinafter referred to as "reporting persons") should be able to report abuses within DEPT® adequately and safely in accordance with the Dutch Whistleblowing Protection Act (Wet bescherming klokkenluiders) and any other applicable whistleblowing laws and regulations.

The submission of such suspicions enables DEPT® to act and remedy the situation. This policy contains regulations that enable reporting persons to report abuses. We refer to these regulations as the Speak Up Policy.

We understand that it is not always easy to raise concerns about possible abuse, but we want everyone to feel safe while working within or with DEPT® and thus encourage you to come forward with any concerns and SPEAK UP!



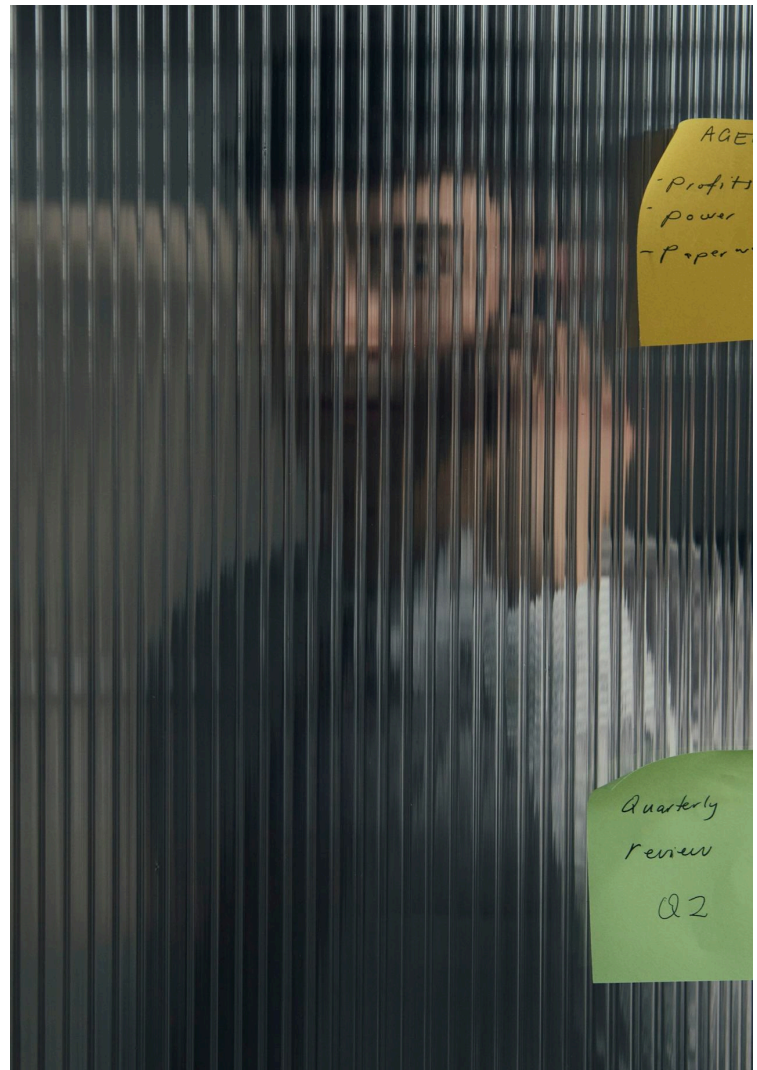
# Why do we have this policy?

DEPT® and its employees (“Depsters”) are committed to operating in compliance with laws, rules and policies and conducting business with integrity and fairness. Despite such commitment, you may observe conduct that concerns you, or that seems to violate our Code of Conduct, policies or even the law. We prohibit all types of breaches of EU law, national law, or internal rules and policies by any of our board members, officers, managers, employees, contractors or others involved in our daily business.

If you have any suspicions of or observe abuses, we encourage you to speak up. If you don’t come forward, we will not be able to deal with the situation and cannot ensure a safe work environment. Remaining silent about possible abuses may even worsen the situation and undermine trust, resulting in a bad reputation, reduced success and diminished ability to operate our business effectively. Your voice is essential to us!

This Speak Up Policy sets out the procedure for reporting persons to report (a suspicion of) abuses within DEPT® in accordance with the Dutch Whistleblowing Protection Act (Wet bescherming klokkenluiders). It explains that you can report (a suspicion of) abuses in confidence and without fear of retaliation as protected under Dutch law. It also describes what you can expect from us when speaking up.

To ensure the effectiveness of this policy, DEPT® will provide regular training to all personnel on their rights and responsibilities under the Dutch Whistleblowing Protection Act and related laws and regulations in countries where DEPT® has presence. This includes onboarding training for new employees and annual training sessions for existing employees to maintain awareness of reporting procedures and legal protections.



# Concerned about a breach?

If you see, hear or suspect something that feels wrong, here's what to do.

Concerned about a breach:

**BRIBERY   LAW BREACH  
HARRASSMENT  
SAFETY RISK  
ENVIRONMENT   FRAUD**

**WHAT SHOULD I DO ?**

**SUBMIT A REPORT VIA:**

1. Email or [online form](#) (Annex A)
2. Phone call to the designated number (in policy)
3. Face-to-face meeting with the General Counsel, Data Protection Officer, Chief Development Officer, or Chief People Officer

**EXTERNAL REPORTING**

External competent authority  
(You may choose to report externally at any time)

**NEED ADVICE FIRST ?**

If you have any questions before submitting a report, email: [speakup@deptagency.com](mailto:speakup@deptagency.com)

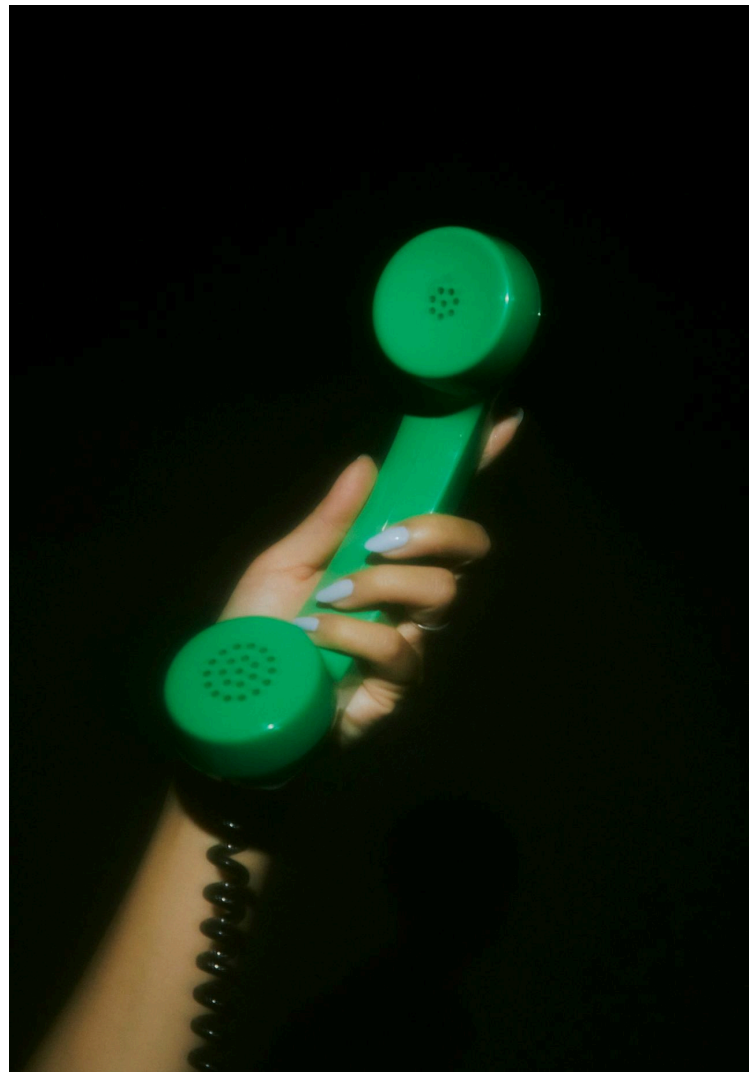
# When to speak up?

We encourage you to speak up when you have any concerns about abuses (misstanden) within DEPT®. Reportable abuses include violations of laws, regulations, or generally accepted standards that harm or are likely to harm the public interest, including but not limited to:

- Violations of our Code of Conduct or policies that affect the public interest
- Inadequate financial or non-financial recordkeeping
- Improper use of DEPT®'s assets and resources
- Conflicts of interest
- Fraud
- Bribery
- Environmental protection, public health and safety, consumer protection, product safety and compliance
- Breaches of financial services, products and markets, and prevention of money laundering and terrorist financing
- Data protection and privacy violations
- Harassment, discrimination, and any form of retaliation against reporting persons

This Speak Up Policy is specifically for reporting abuses (misstanden) that qualify for protection under the Dutch Whistleblowing Protection Act (and other applicable laws and regulations in relation to whistleblowing). It is not meant for:

- Reporting events causing an immediate threat to life or property (in which event you should directly contact your local authorities or call your country's emergency phone number).
- Reporting grievances you may have in relation to your terms of employment (in which event you should contact your (local) People team).
- Settling personal or legal disputes
- Making accusations which you know are false (doing so may lead to disciplinary measures)



# To whom to speak up?

If you have any concerns about abuses, we encourage you to consider discussing this internally first, though this is not required under the Dutch Whistleblowing Protection Act. You may discuss your concern with designated individuals and through channels described herein. You have the right to report directly to external authorities if you prefer, particularly if internal reporting is not appropriate or effective.

You can submit your report through any of the following methods:

1. in writing by filling out the reporting form attached hereto as Annex A and either sending it by email to [speakup@deptagency.com](mailto:speakup@deptagency.com) or filling it out online;
2. orally by telephone at +31(0)880400888 (and you will be redirected to the right person); or,
3. upon request, in a face-to-face conversation at a location to be arranged within a reasonable period.

The designated independent roles responsible for receiving and handling reports are the General Counsel, the Data Privacy Officer, the Chief Development Officer and the Chief People Officer, who operate independently from operational management. Only these designated independent officers and their authorised support staff have access to these reporting channels, and your report shall be treated confidentially in accordance with the Dutch Whistleblowing Protection Act. Your identity will be protected in accordance with Dutch data protection laws (AVG) and the Dutch Whistleblowing Protection Act. Reports may also be submitted anonymously through an online submission. While we encourage identifying yourself to facilitate investigation and follow-up, we will accept and investigate anonymous reports to the extent possible.

To request a face-to-face conversation, reporting persons may send a request to [speakup@deptagency.com](mailto:speakup@deptagency.com). DEPT® will arrange such meetings within a reasonable timeframe, typically within 10 business days of the request, at a mutually convenient and confidential location. The meeting will be conducted by one of the designated independent officers.

We strongly encourage you to raise concerns internally through one of the available channels. Taking a concern to an outside party (e.g., the media) can have serious implications for DEPT®, Depsters, the person(s) involved and possibly also for yourself. By speaking up internally you give DEPT® the chance to first solve the problem and take the appropriate action. However, if you prefer not to raise your concern within DEPT® for any reason, the law recognizes that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. We strongly encourage you to seek advice before reporting a concern to an external competent authority.



# External Competent Authorities

You may contact an external competent authority at any time. A non-exhaustive overview of such authorities is provided in the table on the next page.

For example, in The Netherlands, you can report to the Dutch Authority for Consumers and Markets (Autoriteit Consument en Markt - ACM) or other relevant supervisory authorities. For general advice, you may also contact the House for Whistleblowers ([huisvoorklokkenluiders.nl/contact](https://huisvoorklokkenluiders.nl/contact)).



Country	Whistleblowing authorities
<b>The Netherlands</b>	House for Whistleblowers (Huis voor Klokkenluiders) <a href="https://www.huisvoorklokkenluiders.nl/">https://www.huisvoorklokkenluiders.nl/</a>
<b>UK</b>	Protect (formerly Public Concern at Work) <a href="https://protect-advice.org.uk/">https://protect-advice.org.uk/</a>
<b>Ireland</b>	Protected Disclosures Commissioner <a href="https://www.protecteddisclosures.gov.ie/">https://www.protecteddisclosures.gov.ie/</a>
<b>US</b>	Multiple agencies depending on sector: <ul style="list-style-type: none"> <li>• OSC (federal employees)</li> <li>• OSHA (workplace safety)</li> <li>• SEC (securities)</li> <li>• CFTC (commodities)</li> </ul> Various agency websites
<b>Germany</b>	Federal Office of Justice (BfJ) - Whistleblowing Authority <a href="https://www.bundesjustizamt.de/hinweisgeberstelle">https://www.bundesjustizamt.de/hinweisgeberstelle</a>
<b>Denmark</b>	Danish Business Authority (Erhvervsstyrelsen) <a href="https://erhvervsstyrelsen.dk/whistleblower">https://erhvervsstyrelsen.dk/whistleblower</a>
<b>Croatia</b>	Croatian Financial Services Supervisory Agency (HANFA) for financial sector Ministry of Justice and Administration for general matters <a href="https://www.hanfa.hr/">https://www.hanfa.hr/</a> <a href="https://mpu.gov.hr/">https://mpu.gov.hr/</a>
<b>Spain</b>	Independent Authority for Fiscal Responsibility (AIReF) • Whistleblowing Office Various sector-specific authorities <a href="https://www.airef.es/">https://www.airef.es/</a> Multiple sector authorities
<b>Switzerland</b>	No centralized authority Sector-specific bodies: <ul style="list-style-type: none"> <li>• FINMA (financial services)</li> <li>• Various cantonal authorities</li> </ul> <a href="https://www.finma.ch/">https://www.finma.ch/</a> Cantonal websites
<b>Argentina</b>	Oficina Anticorrupción (OA) <a href="https://www.argentina.gob.ar/anticorrupcion">https://www.argentina.gob.ar/anticorrupcion</a>
<b>North-Macedonia</b>	Ministry for Interior Affairs <a href="https://mvr.gov.mk/en-GB/uslugi/adresi-i-kontakt-telefoni">https://mvr.gov.mk/en-GB/uslugi/adresi-i-kontakt-telefoni</a> State Commission for Prevention of Corruption (SCPC) <a href="https://www.dksk.mk/">https://www.dksk.mk/</a> The Ombudsman of Republic of North Macedonia <a href="https://ombudsman.mk/homepage.aspx">https://ombudsman.mk/homepage.aspx</a>
<b>India</b>	Central Vigilance Commission (CVC) <a href="https://cvc.gov.in/">https://cvc.gov.in/</a>
<b>Canada</b>	Office of the Public Sector Integrity Commissioner (PSIC) <a href="https://www.psic-ispc.gc.ca/">https://www.psic-ispc.gc.ca/</a>
<b>Australia</b>	Australian Securities and Investments Commission (ASIC) <a href="https://www.asic.gov.au/about-asic/contact-us/reporting-misconduct-to-asic">https://www.asic.gov.au/about-asic/contact-us/reporting-misconduct-to-asic</a>

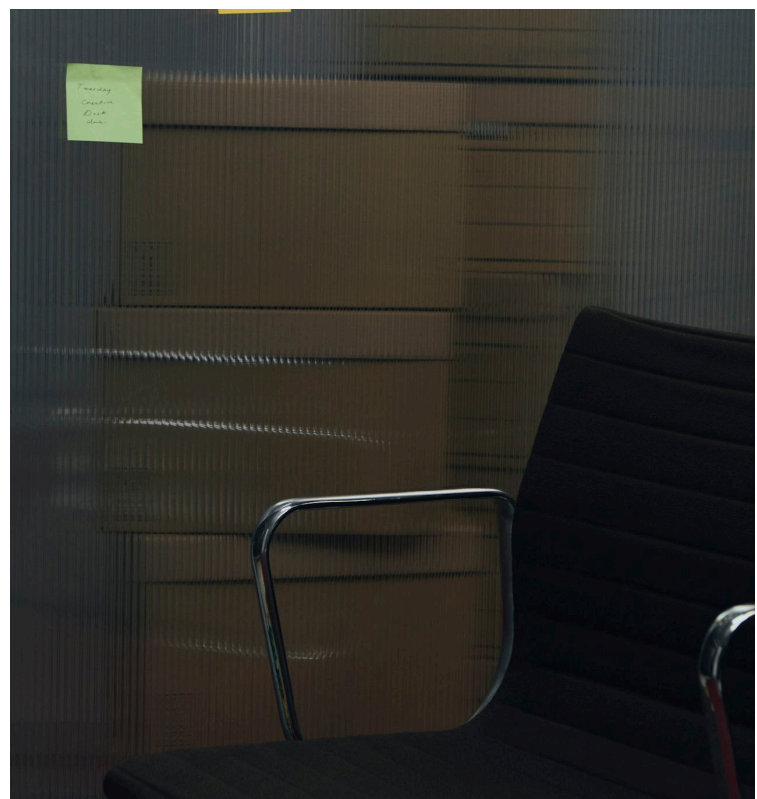
# What information should be provided?

When you want to submit your concern or suspicion of an abuse in writing, you may use the form attached hereto as Annex A. If you wish to share any supporting documents along with your report, you can do so by sending an email to [speakup@deptagency.com](mailto:speakup@deptagency.com). If you prefer to submit your concern verbally (phone call or face to face meeting), please provide as much detailed information as possible to enable DEPT® to assess and further investigate the matter, ideally including:

- The background, history and reason for the concern
- Names, dates, places and other relevant information
- Documents that may support your concern (considering that you should not search for evidence and therewith wait to submit your concern)

We will only be able to follow-up your concern once we receive enough information enabling us to assess that there is a reasonable possibility of abuse.

Speak up as soon as possible: it is always better to discuss matters upfront. However, never investigate the matter yourself and do not seek evidence to first build a strong case and therewith await to speak up about your concern. Just inform us about the facts you have and let DEPT® look into the matter to determine whether there is a reason for concern and what action should be taken.



# Feeling free and safe to speak up



Your submission will be treated confidentially in accordance with the Dutch Whistleblowing Protection Act. The information will only be shared on a 'need to know' basis for investigation purposes. We will not disclose your identity without your consent, except if required by law or court order. Under the Dutch Whistleblowing Protection Act, DEPT® is prohibited from taking any detrimental action against you for making a report in good faith, including dismissal, demotion, suspension, threats, harassment, discrimination, or any other unfavorable treatment. This protection applies even if your concern later turns out to be unfounded, provided you had reasonable grounds to believe the information was true at the time of reporting. You have the right to consult a trusted adviser at any stage of the reporting process to seek guidance and support.

However, protection under the Dutch Whistleblowing Protection Act does not apply if you knowingly make a false report. Disciplinary action may be taken only if it can be proven that you knew the information was false at the time of reporting.

# What happens after you speak up?

Every report will be taken seriously and handled by the designated independent officers. We will confirm receipt of your report within 7 days after receipt, as required by the Dutch Whistleblowing Protection Act. The designated independent officers will oversee the investigation process to ensure independence and objectivity.

We will investigate your report and provide feedback on the follow-up actions taken within 3 months after receipt, as required by the Dutch Whistleblowing Protection Act. In exceptional circumstances requiring more time, we will inform you of the reasons for the delay.

We might contact the person(s) involved to verify the information as provided by you. When you submit a report of an abuse, we ask you to stay involved in and cooperate with the investigation, such as by answering questions and provide further information. If deemed necessary by us or requested by you, we will arrange for a meeting with you to discuss your concern. You are free to bring a colleague to such meeting, if that makes you feel more comfortable. Needless to say, you as well as your colleague must respect the confidentiality of your disclosure and the existence of the investigation.

If your concern is well-founded (i.e., we established that abuses have indeed taken place), appropriate measures will be taken where necessary. We will keep you informed of the progress of investigations at reasonable intervals and will inform you of the overall outcome of our investigation (i.e., whether the alleged abuse has taken place).

However, we will not provide you with in-depth details of the abuses for legal, privacy and confidentiality reasons.

We will maintain records of all reports in accordance with EU whistleblower protection requirements (for at least 5 years as required by the Act), including follow-up actions taken.

If you believe that DEPT® has not handled your report appropriately, you may approach the relevant Dutch supervisory authority (such as the Dutch Authority for Consumers and Markets - ACM) or other competent authorities depending on the subject matter of your report. These authorities can investigate the alleged abuse and assess whether proper procedures were followed.

- advise you and inform you about your legal protection
- investigate malpractices; and
- investigate treatment of staff after reporting malpractices.



**If you have any questions relating to this Speak Up Policy or if you need assistance, please send an email to [speakup@deptagency.com](mailto:speakup@deptagency.com).**



## Annex A

# DEPT<sup>®</sup> Speak Up Reporting Form

## CONFIDENTIAL MISCONDUCT REPORTING

This form is designed to help you report concerns about potential misconduct in accordance with the DEPT<sup>®</sup>'s Speak Up Policy. All information will be treated confidentially, and you are protected against retaliation for making reports in good faith.

### SECTION 1 REPORTING PERSON INFORMATION

#### 1.1 Contact details (Optional - you may submit anonymously)

- Name: \_\_\_\_\_
- Position/Role: \_\_\_\_\_
- Department/Team: \_\_\_\_\_
- Email Address: \_\_\_\_\_
- Phone Number: \_\_\_\_\_

#### Preferred Contact Method:

- Email
- Phone
- In-person meeting
- No contact (anonymous)

#### 1.2 Reporting Person category (Please select all that apply)

- Current employee
- Former employee
- Job applicant
- Volunteer
- Trainee
- Self-employed person working for DEPT<sup>®</sup> / Contractor
- Shareholder
- Member of management/supervisory body
- Supplier
- Person working under supervision and direction of contractors, subcontractors or suppliers
- Other (please specify): \_\_\_\_\_

#### 1.3 Anonymous reporting

- I wish to submit this report anonymously
- I am willing to be contacted for follow-up questions

## SECTION 2 NATURE OF THE CONCERN

#### 2.1 Type of breach (Please select all that apply)

- Violations of EU or national law
- Violations of Code of Conduct or policies affecting public interest
- Inadequate financial or non-financial recordkeeping
- Improper use of DEPT<sup>®</sup>'s assets and resources
- Conflicts of interest
- Fraud
- Bribery
- Environmental protection violations
- Public health and safety concerns
- Consumer protection issues
- Product safety and compliance violations
- Financial services breaches
- Money laundering or terrorist financing
- Data protection and privacy violations
- Harassment, discrimination, or retaliation
- Other (please specify): \_\_\_\_\_

#### 2.2 Urgency level

- Immediate threat to life or property  
(If yes, have you contacted emergency services?)
- Serious misconduct requiring urgent attention
- Ongoing misconduct
- Past misconduct that should be investigated

Annex A

# DEPT<sup>®</sup> Speak Up Reporting Form

## SECTION 3 DETAILED DESCRIPTION

### 3.1 Summary of concern

Please provide a clear, detailed description of the misconduct, including background, history, and reason for concern:

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### 3.2 Specific information (Please provide as much detail as possible)

Names involved: \_\_\_\_\_

Dates/timeframe: \_\_\_\_\_

Locations: \_\_\_\_\_

Other relevant details: \_\_\_\_\_

### 3.3 How did you become aware of this information?

- Direct observation
- Told by someone else
- Found documentation

Other: \_\_\_\_\_

### 3.4 Supporting evidence (IMPORTANT: Do not investigate, gather evidence, or confront anyone yourself as this may compromise the investigation and your safety)

I have supporting documents (please describe):  
\_\_\_\_\_

I know of witnesses (please provide names if comfortable):  
\_\_\_\_\_

I have other evidence (please describe):  
\_\_\_\_\_

No supporting evidence available

## SECTION 4 PREVIOUS REPORTING

### 4.1 Have you previously reported this concern?

- No, this is my first report
- Yes, internally to: \_\_\_\_\_  
(Date: \_\_\_\_\_)
- Yes, externally to: \_\_\_\_\_  
(Date: \_\_\_\_\_)

### 4.2 If previously reported, what was the outcome?

## SECTION 5 IMPACT AND CONSEQUENCES

### 5.1 Who or what is affected by this misconduct?

- DEPT<sup>®</sup> employees
- Clients/customers
- General public
- Environment
- Financial markets
- Other: \_\_\_\_\_

### 5.2 What harm has occurred or might occur?

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## Annex A

# DEPT<sup>®</sup> Speak Up Reporting Form

## SECTION 6 ACKNOWLEDGEMENTS AND CONSENT

### 6.1 Legal protections (Please confirm you understand)

- I understand that my submission will be treated confidentially in accordance with the Dutch Whistleblowing Protection Act
- I understand that DEPT<sup>®</sup> is prohibited from taking detrimental action against me for making this report in good faith
- I understand that protection applies even if my concern turns out to be unfounded, provided I have reasonable grounds to believe the information was true

### 6.2 False reporting (Please confirm)

- I confirm that I am not knowingly making a false report
- I understand that disciplinary action may be taken if it can be proven that I knew the information was false at the time of reporting

### 6.3 Investigation cooperation

- I am willing to cooperate with any investigation, including answering questions and providing further information
- I would like to arrange a meeting to discuss my concern
- I would prefer to bring a colleague to any meeting for support

### 6.4 Data processing consent

- I consent to DEPT<sup>®</sup> processing my personal data for the purpose of investigating this report in accordance with the General Data Protection Regulation (GDPR) and Dutch implementation laws
- I understand that records will be maintained for at least 5 years as required by the Dutch Whistleblowing Protection Act

## SECTION 7 SUBMISSION

Date of submission: \_\_\_\_\_

Signature: \_\_\_\_\_  
(Not required for anonymous submissions)

## WHAT HAPPENS NEXT?

- We will confirm receipt of your report within 7 days
- We will investigate your report and provide feedback within 3 months (if you disclosed your identity to us)
- In exceptional circumstances requiring more time, we will inform you (if you disclosed your identity to us) of the reasons for delay
- If your concern is well-founded, appropriate measures will be taken
- We will keep you informed of the progress at reasonable intervals and will inform you of the overall outcome (if you disclosed your identity to us)

## EXTERNAL REPORTING OPTIONS

If you are not satisfied with DEPT<sup>®</sup>'s handling of your report, you have the right under the Dutch Whistleblowing Protection Act and other relevant local whistleblowing laws to report externally to the authorities as described in the DEPT<sup>®</sup> Speak Up Policy.

**For questions about this form or the reporting process: [speakup@deptagency.com](mailto:speakup@deptagency.com)**