

BAS GROUP

Summary BAS Whistleblower Policy

What is the whistleblower procedure of BAS?

The whistleblower procedure is an internal reporting procedure for reporting (suspected) wrongdoing:

- Reporting possible (suspected) violations by employees, partners or stakeholders of BAS;
- Danger to public health, safety of individuals, damage to the environment or to the proper functioning of public services or a company due to improper action or inaction.

Who does the whistleblower procedure apply to?

Reports can be made by natural persons who have a work-related connection to BAS. There is a work relationship if the reporter:

- is (has been or will be) employed by a BAS organization where the situation occurs; or
- works or has worked there as a freelancer, temporary worker, intern or volunteer; or
- if the reporter is a job applicant (or has been); or
- is directly involved with a BAS organization where the situation occurs through their own work.

Why do we have a whistleblower procedure?

To maintain the integrity and compliance with internal and external rules within BAS Group B.V. and its affiliated subsidiaries, BAS is committed to preventing (potential threats to) violations of values and rules. For the (threats to) violations that do occur, it is essential that they are identified, clarified and eliminated.

How can a report be made?

A reporter is authorized to make their report both in writing and orally, and both physically and online.

In Writing:

- Online:
Via the website [//www.basgroup.com/ethics](http://www.basgroup.com/ethics)
- By post:
Write a letter
Whistleblower Reporting Procedure BAS
Attn: R.W. aan den Toorn
Mac Arthurweg 2
5466 AP Veghel, The Netherlands
- Anonymous: via the website or by post
See above.

Nuncupative:

- In person at the office:
Make an appointment with the official R.W. aan den Toorn
Mac. Arthurweg 2
5466 AP Veghel, The Netherlands

Support from a confidant

An Employee can consult a confidant for information, advice, and support regarding suspected wrongdoing or irregularity. The contact details can be found under 'Before submitting a report' at [//www.basgroup.com/ethics](http://www.basgroup.com/ethics).

What happens after a report is received?

1. The reporter receives an acknowledgment of receipt within 7 days.
2. The official evaluates the admissibility and validity of the report.
3. The report can immediately lead to fact-finding, further preliminary investigation, or a decision that no investigation is necessary. The official makes this assessment.
4. BAS provides the reporter with information on the evaluation and how the report is or will be followed up within a maximum of 3 months after sending the acknowledgment of receipt.

Key Principles in Handling a Report

BAS ensures the protection of confidentiality, the prohibition of retaliation, the prohibition of non-disclosure agreements, anonymous reporting, the legal protection of reporters, and the protection of accused individuals.

Alternative External Reporting Channels

BAS encourages reporters to report (suspected) wrongdoing directly to BAS before reporting it to an external channel. However, this does not affect the reporter's right to directly contact an external channel such as the House for Whistleblowers.

The full whistleblower policy can be found at:

[//www.basgroup.com/ethics](http://www.basgroup.com/ethics).