



#SPEAKUP PROCEDURE

SCOPE

Any employee within the WDP group, any member of the Board of Directors or any Management Committee member can report:

- actual or potential violations of the legal rules observed by WDP and its employees for which there is a reasonable suspicion (such as misuse of inside information, accounting fraud, active or passive corruption, embezzlement, etc.), and/or
- actual or potential employee conduct that is contrary to the ethical standards that WDP stands for, whereby harassment, discrimination, corruption, ...are to be considered as a violation towards WDP's ethical standards, and/or
- actual or potential employee conduct that conflicts with procedures such as the WDP Corporate Governance Charter, the #TeamWDP Code of Conduct, the Suppliers Code of Conduct, the Code of Ethics, the Human Rights Policy, the Anti-bribery and corruption policy... (hereinafter collectively the irregularities).

PURPOSE OF THE #SPEAKUP PROCEDURE

The purpose of the procedure is to:

- encourage employees to report irregularities;
- protect employees who report irregularities in good faith against adverse consequences;
- treat all reports made under this regulation uniformly, discreetly and confidentially;
- investigate all reports of irregularities thoroughly, fairly and in a timely manner, and ensure an honest investigation for all involved;
- take all reasonable measures to deal with irregularities if they have occurred; and
- take measures against anyone who adversely treats an employee who makes a report in good faith; for employees, this involves the disciplinary sanctions provided for in the working regulations.

REPORTING PROCEDURE

Irregularities can be reported to the compliance officer and/or the Chairman of the Board of Directors (hereinafter the **complaints officer**), through a dedicated grievance form available on the WDP website, WDPConnect! or in person.

Every person making a report must disclose his/her identity. Anonymous reports will not be acted on, but WDP reserves the right to investigate them further.

The reporting person is asked to provide the following specific information and documents (if he or she has them):

- the facts that prove the irregularity;



- the nature of the irregularity;
- the name and, if applicable, the position of the person accused of having committed an irregularity;
- the period during which the irregularity took place; and
- any evidence of the irregularity and any other element that seems relevant to him or her.

The complaints officer investigates the report in a completely impartial manner. The complaints officer has the right to hear persons and witnesses or to call upon independent internal or external authorities for the verification of certain information.

During the handling of the report, the complaints officer is bound to maintain confidentiality with regard to the Board of Directors and third parties unless precautionary measures need to be taken immediately (to prevent evidence from being destroyed). The complaints officer is no longer bound to confidentiality with regard to the reporting person if said person breaks the confidentiality himself/herself in violation of this internal procedure.

After investigating the report, the complaints officer submits an opinion to the Board of Directors (if the report concerns an employee), the Audit Committee or the Nomination Committee (if the report concerns a member of the Management Committee or a director), regarding whether he has concluded that the report is **either well-founded or evidently unfounded**. The opinion contains a detailed description of his findings and all supporting documents.

In all other cases, the investigation comes to an end. The complaints officer will inform the Board of Directors (if the report concerns an employee or external service provider), the Audit Committee or the Nomination Committee (if the report concerns a member of the Management Committee or a director) about the termination of the investigation.

CONSEQUENCES OF THE REPORT AND POSSIBLE PENALTIES

If a report proves to be **well-founded**, WDP will do everything that is reasonably possible to address and remedy the irregularities found. WDP will inform the person who committed the irregularity of the measures that WDP is considering taking as a result of the irregularity. WDP will inform the reporting person of the outcome of the investigation (in particular the validity of the report and the measures to be taken) after hearing the person who committed the irregularity and after making a decision regarding the measures to be taken.

If a report proves to be **evidently unfounded**, WDP will inform the person about whom the irregularity was reported about the unfounded nature of the report. WDP will inform the reporting person of the outcome of the investigation (in particular the evidently unfounded nature of the report) and the measures it is considering taking as a result of the evidently unfounded report.



After the investigation by the complaints officer, WDP can – in the case of an evidently unfounded report and with regard to the reporting person, or – in the case of a well-founded report with regard to the person who has committed an irregularity – impose an appropriate penalty (for employees, this is one of the **disciplinary sanctions** provided for in the working regulations which generally includes a verbal or written warning, a blame, a notice of default or a dismissal for serious cause), without prejudice to the option for WDP and/or third parties **to address the reporting person or the person who has committed the irregularity in civil or criminal cases.**

POSITION OF THE COMPLAINTS OFFICER WITHIN THE CONTEXT OF THIS #SPEAKUP PROCEDURE

The complaints officer must be able to perform his/her duties in full autonomy and independence without receiving instructions from others.

Each report is handled by the complaints officer with **maximum discretion.**

If the complaints officer believes that he cannot handle a certain report, either because he would be directly or indirectly involved in the report, or on any other reasonable grounds, he must report this immediately to the Chairman of the Board of Directors (if the report was made with the compliance officer) or the compliance officer (if the report was made to the Chairman of the Board of Directors). In the first case, the Chairman of the Board of Directors will act as the complaints officer. In the second case, the compliance officer will act as the complaints officer. Where appropriate and for any reason whatsoever, the Chairman of the Board of Directors or the compliance officer may also appoint an ad hoc complaints officer.

COMMITMENTS TO THE REPORTING PERSON

Unless the reporting person has expressly indicated that he/she does not want to be contacted, or the complaints officer considers on reasonable grounds that it would detract from the protection of the confidentiality of the investigation, the reporting person will be kept informed of the follow-up of his/her report as follows:

- confirmation of receipt of the report within 7 days of receiving the report, indicating the next steps to be taken; and
- notification of the outcome of the investigation into the reported irregularity, whereby WDP aims for a resolution within 30 days of receiving the report.

The reported irregularity will be treated with the utmost confidentiality (respecting the identity of the reporting person as well as the person about whom the irregularity was reported).



During and after the handling of the report, the complaints officer may not disclose the identity of the reporting person, nor may he disclose elements that make it possible to discover the person's identity, unless this is absolutely necessary in the context of the investigation and/or in order to remedy the irregularity; in any case, it is never done without the prior consent of the reporting person. The reporting person is also expected to treat the submission and handling of his/her report as strictly confidential and not to spread information about it.

WDP also ensures that a person who reports an irregularity in good faith will in no way undergo any negative consequence arising from or in connection with such a report. As such, no civil, criminal or disciplinary claims can be filed, nor can professional sanctions be imposed due to the report. The reporting person is also not considered to be infringing any agreement, or any limitation of disclosure or of communication of information imposed by law or regulations, and cannot be held liable in any way for reporting this information. The fact that it may appear that the report is unfounded after the investigation of the alleged irregularity is irrelevant.

The aforementioned protection is not guaranteed to the person who submits a report in bad faith (i.e. wilfully makes false statements; participates in the irregularity himself/herself; submits an evidently unfounded report or submits such a report with frivolous or malicious intent).

COMMITMENTS TO THE PERSON ABOUT WHOM THE IRREGULARITY WAS REPORTED

The complaints officer informs the person about whom the irregularity was reported about the existence of the report in due time. In particular, the complaints officer provides the following information:

- the alleged facts;
- the internal or external services to whom the details of the report or the result of the investigation may be communicated; and
- how the person can exercise his/her rights.

However, WDP reserves the right to postpone this notification in exceptional circumstances and/or in the interest of the investigation (e.g. if it might result in the necessary evidence being destroyed or manipulated).

PROCESSING OF PERSONAL DATA AND RIGHTS OF THE PERSON CONCERNED

Submitting, processing and investigating reports as part of this internal procedure involves the processing of personal data of the persons concerned. WDP SA (Blakebergen 15, 1861 Meise) is responsible for the processing of personal data exchanged as part of this internal procedure.

Personal data exchanged as part of this internal procedure are used for the investigation of the report with a view to taking potential measures or imposing potential penalties following a report, and with a view to defending the interests of WDP or third parties in court.



The legal basis for the processing of personal data as part of this internal procedure for employees is based on the legal obligation of WDP to provide for appropriate internal procedures for reporting actual or potential violations of the rules referred to in Article 45 of the Act of 2 August 2002 on the oversight of the financial sector and financial services and/or on the legitimate interest WDP has in being able to defend its interests and those of its employees in court, if necessary, and to comply with ethical standards as reflected in documents such as the Corporate Governance Charter, the Code of Ethics, the #TeamWDP Code of Conduct, the Supplier Code of Conduct.

WDP can pass on personal data to external advisors, competent authorities and regulators.

If a report proves to be unfounded, WDP will delete personal data within a reasonable period of time. If a report proves to be well-founded, or if a report proves to be evidently unfounded, WDP will retain personal data for as long as is necessary for the purpose of taking measures, imposing penalties or for its defence in court.

Persons whose data are processed within the context of a report of an irregularity have a right to access their personal data. They can have their personal data corrected, ask that their personal data be deleted, or limit the processing of the data.

They may also oppose the processing of their personal data on compelling legitimate grounds.

The exercise of the aforementioned rights may be subject to conditions. However, these rights do not imply a right to access the personal data of other persons.

Persons whose data are processed within the context of a report of an irregularity also have a right to file a complaint with the supervisory authority (in Belgium: the Data Protection Authority (commission@privacycommission.be)).

REGISTER OF FILED REPORTS

The identity of the reporting person is anonymised in the register when the register must be made public (e.g. at the request of the FSMA, or in the context of an internal or external audit).

The register of filed reports is only accessible to the compliance officer or the Chairman of the Board of Directors.