



GRIEVANCE MANAGEMENT PROCEDURE

As approved by the Board of Directors on 11 December 2024.

VISION

WDP is committed to continuous improvement and seeks to appropriately address feedback received from its stakeholders such as clients, investors, employees, suppliers, the local community, etc.

We maintain procedures to address grievances formally raised by stakeholders in relation to WDP, our warehouses, our services, or any processes we apply.

#SPEAKUP PROCEDURE FOR WDP PERSONNEL



#SpeakUp

WDP aims for a corporate culture characterized by honesty and integrity, a sense of responsibility, strict ethics and compliance with the legal rules and corporate governance standards applicable to WDP.

WDP encourages its Personnel (and others under the Whistleblower Act, see below) to discuss **reasonable workplace concerns** and **irregularities** with their direct supervisors, the HR manager or the prevention advisor. This can also be done using internal employment law procedures. However, should this not be possible for any reason, WDP provides for another internal procedure (i.e. #SpeakUp Procedure) to raise their concerns of (possible) breaches of the legal rules or any procedures such as the WDP Corporate Governance Charter, the #TeamWDP Code of Conduct or the Supplier Code of Conduct for which there is a reasonable suspicion.

Without prejudice to the other legal remedies, any violation of the legal rules or any procedures will, if necessary, lead to a dismissal for serious cause.

SCOPE

Any staff member within the WDP group, any member of the Board of Directors or any Executive Committee member (hereinafter referred to as “**Personnel**”) can report:

- actual or potential violations of the legal rules observed by WDP and its Personnel 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 Personnel conduct that is contrary to the ethical standards that WDP stands for, whereby harassment, discrimination, corruption, breach of professional secrecy, etc. are to be considered as a violation towards WDP’s ethical standards, and/or
- actual or potential Personnel conduct that conflicts with procedures such as the WDP Corporate Governance Charter, the #TeamWDP Code of Conduct, the Suppliers Code of Conduct, the Human Rights Policy, the Anti-bribery and Corruption Policy etc. (hereinafter collectively the “**irregularities**”).



Moreover, all Personnel can report irregularities linked to¹:

- public procurement;
- financial services, products and markets, and prevention of money laundering and terrorist financing;
- product safety and compliance;
- transport safety;
- protection of the environment;
- radiation protection and nuclear safety;
- food and animal feed safety, animal health and welfare;
- public health;
- consumer protection;
- protection of privacy and personal data and security of network and information systems;
- tax fraud;
- social fraud;
- financial interests of the EU / Internal market of the EU.

In addition to the Personnel, volunteers, interns, former and future employees, contractors, subcontractors and suppliers, regarding the points related to the Whistleblower Act as described above, can also use this #SpeakUp Procedure.

PURPOSE OF THE #SPEAKUP PROCEDURE

The purpose of the procedure is to:

- encourage Personnel to report irregularities;
- protect Personnel 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 Personnel who makes a report in good faith. For staff members, this involves the disciplinary sanctions provided for in the working regulations.

INTERNAL 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 [form](#) available on the WDP website, WDPConnect! or in person.

Personnel submitting a complaint (hereinafter referred to as the “**reporting person**”) will receive a confirmation of receipt within 7 days of filing the complaint. WDP aims to find a suitable resolution within 30 days of receiving the complaint. In any case, the reporting person can expect feedback from WDP no later than 3 months after the complaint is received.

¹ Within the framework of, among others, the Belgian Whistleblowers Act (Act of November 28, 2022, concerning 'the protection of whistleblowers reporting breaches of Union or national law established within a legal entity in the private sector') and more in general, any anti-money laundering legislation.



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 a staff member or an external service provider), the Audit Committee or the Nomination Committee (if the report concerns a member of the Executive 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 a staff member or an external service provider), the Audit Committee or the Nomination Committee (if the report concerns a member of the Executive Committee or a director) about the termination of the investigation.

EXTERNAL REPORTING PROCEDURE

All of the Personnel are encouraged to report potential breaches through the internal reporting procedure. This enables WDP to follow up reports quickly and appropriately.

Nevertheless, Personnel has the option of using an external reporting channel, for example if they believe that the internal report has not resulted in the desired outcome or if they deem it appropriate to use the external reporting channel immediately.

Infringements or potential infringements relating to topics falling within the competence of the FSMA can be submitted via the following online platform: [Contact Point Whistleblowers | FSMA](#).

A complete overview of the competent authorities to which Personnel can submit an external report can be



found in the Royal Decree of 22 January 2023.²

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 staff members, 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 THE #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 to 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.

² Royal decree of 22 January 2023 designating the competent authorities to implement the law of 28 November 2022 on the protection of reporters of breaches of Union or national law established within a legal entity in the private sector.



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, indicating the next steps to be taken; and
- notification of the outcome of the investigation into the reported irregularity.

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 also guaranteed to those connected to the reporter (e.g. colleagues, family members or persons assisting the reporter) who may become victims of retaliation in a work context.³

The aforementioned protection is not guaranteed to the person who submits a report in bad faith (i.e. willfully 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 POTENTIAL 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

³ Not only the whistleblower is protected, but also those who act as facilitators, their colleagues or family members, or the companies they own or work for.



- 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 this notification 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 NV/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 Personnel 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 Personnel in court, if necessary, and to comply with ethical standards as reflected in documents such as (but not limited to) the Corporate Governance Charter, the #TeamWDP Code of Conduct and 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 defense 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 inspection@apd-gba.be).



REGISTER OF FILED REPORTS

The compliance officer maintains a register of each received report of an irregularity, including whether the report was acted upon, the reasons for deciding whether or not to act on the report, and, if applicable, the actions taken in response to the report.

The identity of the reporting person is anonymized 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.

THIRD PARTY GRIEVANCE MANAGEMENT PROCEDURE

WDP's third party Grievance Management Procedure processes emphasize conciliation to ensure that inappropriate and unlawful practices cease and that grievances are resolved in a sensitive and timely manner.

Therefore, it is key to ensure that all comments, enquiries and complaints will be examined and that appropriate measures will be taken.

KEY PRINCIPLES

- All reported third party grievances will be taken seriously and handled fairly, promptly and consistently.
- Regulatory requirements are complied with.
- WDP seeks to resolve complaints through mutually agreed solutions.
- The mechanisms will not prevent access to other judicial or administrative remedies that might be available under law or through existing arbitration or mediation procedures, nor will it substitute for grievance mechanisms provided through workers' organizations or collective agreements.
- Information on ways to make complaints will be put available in different ways, always taking into account the specific situation for determining the most appropriate means: on our website, on site premises, in strategic public locations around the site premises, leaflets, etc.
- All individuals from #TeamWDP who are likely to interact with the stakeholders are well informed about this third party grievance mechanism, whether it is project related or not.
- Lodging a grievance does not incur any cost to the complainant.
- All personal details of an individual are handled in accordance with the applicable privacy regulation.
- Maintain open communication regarding progress.

#SPEAKUP PROCEDURE FOR STAFF MEMBERS OF WDP SUPPLIERS



Besides a community grievance management procedure (#ShareYourThoughts Procedure for the community, see below), WDP provides a grievance management procedure to raise workplace concerns for staff members of WDP suppliers (e.g. contractors or other intermediaries to work on WDP project/construction sites or those performing work directly related to the core functions of the project/construction).



Supplier staff members will be able to submit grievances in accordance with the grievance management procedure for WDP Personnel, which will apply mutatis mutandis.

For more details, please consult the #SpeakUp Procedure, as detailed above.

#SHAREYOURTHOUGHTS PROCEDURE FOR THE COMMUNITY



#ShareYourThoughts

This community grievance management procedure is open for all of our stakeholders. For example, a customer complaint may relate to a significant issue relating to poor customer experience. Or an investor complaint may relate to grievances involving our communication or privacy procedures.

Venue to lodge grievances

Incidents and/or complaints can be lodged on our website through a standardized [form](#). For certain development projects WDP might provide for additional specific venues to lodge grievances such as main project offices, local authorities' offices, specific online grievance filings. This depends on the project (type, location, size, scheduled term).

Timeframe and point of contact

- Written acknowledgement of receipt of the grievance: within 7 days of receiving grievance (in writing or verbally).
- Proposed resolution: WDP aims for a resolution within 30 days of receiving the grievance.

At the time of the acknowledgement of receipt of the grievance a specific point of contact may be designated by WDP depending on the subject of the complaint.

Anyone who has lodged a grievance will have the opportunity to have someone accompanying him to meetings and interviews held during the investigation of the grievance.

Third party involvement

If deemed necessary, e.g. when a complaint has been declared resolved by WDP but the complainant is not satisfied, a second tier of grievance management might be added through mediation or binding arbitration.

GRIEVANCE ADMINISTRATION

All grievances are registered and logged in a register in order to monitor and keep track of name and contact details of the complainant, date and nature of the complaint, any follow up actions taken, the proposed resolution of the complaint, how and when decisions were communicated to the complainant, whether longer-term management actions have been taken to avoid the recurrence of similar grievances in the future.

As all processes within WDP, this "Grievance management Procedure" is and will be part of regular audits (internally and externally).



<i>Version history</i>	
21.06.2024	Merging two initially separate documents: “#SpeakUp Procedure” (incl. Whistleblowing) + “Grievance Management Procedure” in one document: the “Grievance Management Procedure” (incl. #SpeakUp Procedure and #ShareYourThoughts Procedure).
01.01.2025	Modifications given the abolition of the Management Committee and the implementation of the Executive Committee.