



Whistleblowing Policy – The Netherlands

December 2023

Document Approver	Document Owner
Venterra Group Plc Board of Directors	Group General Counsel

1. Introduction

Venterra Group Plc and its subsidiaries, including CAPE Holland (the **Venterra Group, Venterra, we, us**) are committed to an open, ethical and safe business environment where its workforce feel able to speak up.

2. Who is covered by this Policy?

This policy applies to shareholders, employees, former employees, agency workers, contractors, officers and board members of the Venterra Group.

3. Matters covered by this Policy

We welcome information being brought to the attention of management about unsafe or unethical matters you think are or may be taking place within, or which threaten the interests of, the Venterra Group, its workforce or the public such as:

- fraud
- malpractice (e.g., financial irregularities, corruption, bribery, dishonesty)
- criminal offences
- failure to comply with law
- miscarriages of justice
- dangers to health and safety
- dangers to the environment
- unethical conduct e.g., bullying, harassment
- covering up wrongdoing
- a breach of the Venterra Group Code of Conduct.

Note this procedure is not to be used to address concerns about a personal employment situation, such matters should be raised through the standard employment grievance procedure.

4. Reporting

If you have a concern or enquiry you can:

- Raise the matter with your line manager
- Contact another manager in your team or company, the Venterra Director of Human Resources or the Venterra Group General Counsel
- Contact the Executive Chair of Venterra Group Plc.

Concerns can be raised orally or in writing, see below for contact details.

The name of CAPE Holland's Confidential Adviser who employees can consult with confidentially regarding suspected unsafe or unethical matters is Irene Arends, HR Advisor.

Where it may not be appropriate to contact someone internally, you can contact EthicsPoint via the details below. You may remain anonymous, although please be mindful that anonymity may impede an investigation. EthicsPoint is administered by an independent company, is available 24 hours a day, 7 days a week and can accommodate calls in 200+ languages.

The Group Director of HR and Group General Counsel are responsible for investigating all reports. Reports will be acknowledged within 7 days and feedback provided to the reporter within 3 months to allow for a thorough investigation.

Reference:	VG-LEG-POL-008	Approved By:	Venterra Group Plc Board of Directors
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Usually, you will meet with the person investigating the matter. If you prefer to remain anonymous, you may correspond or speak by phone with the person investigating the matter. You will be informed as far as possible about the outcome of the investigations, subject to the rights of any third parties which must be respected.

Ideally, you will feel able to make a disclosure internally within Venterra or to EthicsPoint. If you wish to raise the issue with an external reporting channel, you can contact any of the following designated competent authorities:

- The Netherlands Authority for Consumers and Markets
- The Dutch Authority for the Financial Markets
- The Data Protection Authority
- De Nederlandsche Bank N.V.
- Whistleblowers Authority
- The Health and Youth Care Inspectorate
- The Dutch Healthcare Authority
- The Authority for Nuclear Safety and Radiation Protection.

5. Confidentiality

You can raise concerns about matters within Venterra in confidence and without fear of reprisals.

Matters raised under this procedure will be kept confidential to the greatest extent possible consistent with law and good business practices. The identity of a whistle-blower will not be disclosed without explicit consent to anyone beyond those dealing with the report, unless this is necessary and proportionate in the context of the investigation. Our whistleblowing channels will respect the confidentiality of the whistle-blower as well as the people surrounding them.


Venterra will not penalise or tolerate retaliation directed against anyone raising concerns or making allegations in good faith or against the people who support whistle-blowers and other concerned third parties. Retaliation is any form of reprisal, direct or subtle. It may take the form of dismissal, suspension, transfer, threats, intimidation, an attempt to identify someone who speaks up, exclusion or humiliation. Any act or threat of retaliation will be treated as a serious violation of our Code of Conduct and may constitute misconduct meriting disciplinary action.

Protection is provided for whistle-blowers who bring matters of public interest to the attention of their employers or outside bodies as set out in the Whistleblower Protection Act (*Wet Bescherming Klokkeluiders*).

If you think that you or someone you know has experienced retaliation, contact any of the resources listed below or the competent authorities listed above.

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Speak Up Resources

Contact Details				
Group Director of HR John Leighton-Jones	+44 (0)20 3154 6357			john.leighton-jones@venterra-group.com
Group General Counsel David Crowther	+44 (0)20 3154 6370			david.crowther@venterra-group.com
Executive Chair, Venterra Group Plc Ayman Asfari	+44 (0)20 3154 6350			ayman.asfari@venterra-group.com
HR Adviser Irene Arends	+31 (0)512 54 26 06			i.everts@WE-PenO.nl
EthicsPoint * Dial Access Code first (where applicable) and then enter Phone Number	Country	Access Codes *	Phone Number	venterragroup.ethicspoint.com 
	The Netherlands	0800-022-9111	844-979-4926	
	United Kingdom	0-800-89-0011	844-979-4926	
	US	N/A	844-979-4926	

References

Document Title	Document Reference
Code of Conduct	VG-LEG-COD-001
Anti-Bribery and Corruption Policy	VG-LEG-POL-001

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