



**Royal Terberg Group
SPEAK UP POLICY
(Whistleblower Policy)**

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Owner			Group HR Director & Group Legal Director
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INTRODUCTION

Royal Terberg Group's Code of Conduct describes how we are to conduct our business, wherever we are in the world and under any circumstances; by doing the right thing.

The Code applies to all Royal Terberg People; all employees, directors, officers, board members, consultants, external workforce and other personnel working under Royal Terberg Group's management.

We expect everyone to report suspected violations of the Code, such as health risks, fraud, bribery, harassment, or other inappropriate behavior. We encourage a safe culture where concerns can be raised without fear of retaliation. If you believe that a situation may be in violation of the Code or inconsistent with our values, or if it simply does not feel right, please do not keep it to yourself. Speaking up empowers us to take action and helps our Company to uphold our values and grow responsibly.

This **Speak Up Policy** gives you guidance on how to report your concerns and confidentially, if needed.

Thank you for raising your concerns!



EXECUTIVE SUMMARY

Why are you encouraged to speak up?

Royal Terberg Group encourages a culture of openness where everyone feels safe to raise questions or concerns related to our Code of Conduct. If something seems unlawful, goes against our values or Code, or simply doesn't feel right—please speak up. Your voice helps us address issues early and maintain our standards.

We understand that speaking up can be difficult, but staying silent may allow problems to grow. If something worries you, don't wait—share your concern.

No retaliation

Royal Terberg Group will not tolerate retaliation against you for raising a concern or requesting an official investigation into a matter (filing a 'Report') in good faith.

Reporting Channels

You can use the following channels to raise your concerns or file a Report about a suspected violation:

- your own manager or supervisor,
- a Human Resources representative,

If you do not feel comfortable using any of the above reporting channels you can access our **Speak Up Reporting Channel** which offers the possibility to file a Report anonymously, when required.

What if you only need advice or support?

If you are uncertain whether a particular situation is or is not a violation of our Code of Conduct, or if you are looking for support in filing a Report, you are encouraged to first raise your concern on a confidential basis with your manager or supervisor or a (local) Human Resources representative. They will be able to offer you advice and support you further.

Full Policy applies

Please note that this executive summary only provides highlights; this full Speak Up Policy is the binding text.

1. WHO CAN SPEAK UP?

We invite all employees, directors, officers, board members, consultants, external workforce (Royal Terberg People) as well as other (external) business stakeholders with a valid interest in improving Royal Terberg Group's business (e.g. suppliers, contractors, seconded personnel) to raise concerns.

Our goal is to continuously strengthen Royal Terberg Group by ensuring that we all work responsibly, guided by our Values and Code of Conduct.

2. CONFIDENTIALITY

All Reports will be handled in a confidential manner. If you file a Report in person, the recipient of your report will know your identity. That person is not allowed to communicate your identity to others without your permission.

Sometimes keeping your identity confidential can hinder or complicate an investigation. Sometimes it even prevents Royal Terberg Group from being able to take appropriate actions. In such instances, you will be asked for permission to share your identity. Your identity will only be shared—with your consent—with individuals who need it to conduct a thorough and fair investigation.

3. SCOPE OF THE SPEAK UP POLICY

3.1. What kind of concerns can I raise?

Royal Terberg People and stakeholders are encouraged to raise a concern and/or file a Report if they believe an issue is in violation of the law, or not entirely in line with Royal Terberg Group's values or with our Code of Conduct.

This Speak Up Policy is not intended to channel complaints about terms of employment, annual appraisals/evaluations or similar matters.

3.2. What kind of concerns must I raise?

Certain issues present risks which are so high you cannot allow them to be ignored. This is the case for circumstances as listed below. Please note that this is not an exhaustive list:

- Violation of any laws or governmental regulations, orders or authority instructions
- Breach of the Royal Terberg Group Code of Conduct, Royal Terberg Policies or operational guidelines or handbooks of Royal Terberg Group and its subsidiaries
- Corruption and financial irregularities (e.g. paying, offering and/or receiving bribes)
- Misappropriation of company assets (e.g. theft, embezzlement, company secrets or other assets, including customers' assets)
- Discrimination of any kind (including but not limited to discrimination based on race, sex or sexual orientation)



- Bullying, harassment or physical abuse
- Breach of health and safety rules including creating security, health or safety hazards
- Any misuse of Royal Terberg Group's property (e.g. unauthorized access to Royal Terberg' premises or vandalism on Royal Terberg' property)
- Professional misconduct or company malpractice
- Disclosing company's confidential information to third parties
- Acting beyond mandate or otherwise misusing authority
- Publishing confidential or false statements about Royal Terberg Group, its business or employees, in any media including but not limited to internet, blogs and social networking sites
- Environmental misconduct (e.g. non-compliance with and/or indifference to the environmental laws and regulations)
- Anti-competitive behavior such as information exchange among competitors
- Behavior that presents a conflict of interest (e.g. competing with Royal Terberg Group in any form, conducting personal business deals with friends or family on behalf of Royal Terberg Group)
- Violating Royal Terberg Group's privacy or cyber security instructions (including unauthorized dissemination of confidential or proprietary information)
- Breach of information security (e.g. unauthorized access to computer data, applications, networks or devices)
- Incapacity for work due to being under the influence of alcohol or nonprescribed drugs
- Presenting unfounded claims or information and/or report suspected Code Violation in bad faith
- Retaliation against a person who raises (has raised) concern/reports a suspected Code Violation or other actions

Where such circumstances are suspected these must be reported.

3.3. What if I do not have all the facts?

Please raise your concern or submit a report—even if you don't have all the facts. The goal is to help improve our company and uphold our Code of Conduct and Company Values.

3.4. What if I only need advice or support?

If you are uncertain whether a particular situation is or is not a violation or if you are looking for support in filing a Report, you are encouraged to first raise your concern on a confidential basis with your manager or supervisor or an HR representative.

They will be able to offer you advice on possible next steps. They can also assist you in identifying the correct channels for filing your Report. As indicated already above, they cannot disclose your identity without your permission.

4. RETALIATION

4.1. How do we prevent negative effects on you?

Royal Terberg Group does not tolerate any negative consequences for raising concern(s) or submitting a report in good faith. The meaning of 'good faith' is explained further below.

If you believe you've been treated unfairly or retaliated against for speaking up, please report it through the same channel used to file your original concern. Management will always take appropriate action to ensure disciplinary measures are taken where necessary against the offender(s).

4.2. Good Faith

Those who raise a concern in good faith will not be put at a disadvantage as a result of speaking up. In this context good faith means that a person in similar circumstances would reasonably believe or suspect that our Code of Conduct was violated and that it is reasonable to raise a concern and/or file a Report in that case. The reporting person does not have to present validated evidence to support their claims, but the reported information must be based on fact(s).

If upon investigation no violation of our Code of Conduct is discovered, no action will be taken against you.

4.3. Bad Faith

Reporting in bad faith means you know that what you are reporting is substantially not true, and that you are abusing the reporting process, motivated by personal grievances or self-interest. Royal Terberg Group does not tolerate reporting in bad faith.

5. REPORTING CHANNELS AND PROCESS

5.1. Where can I file a Report?

We hope that you feel sufficiently comfortable in your work environment to raise your concerns and/or file a Report with your own manager or supervisor or with your (local) HR representative. This method is encouraged because it is the fastest way to clear up any misunderstandings and to ensure an open working environment throughout Royal Terberg Group.

If you feel uncomfortable discussing a concern or filing a Report with your manager or supervisor or with your (local) HR representative, or if it is not possible to do so, or if you are dissatisfied with the outcome, you can raise your concern or file your report through our Speak Up Channel.



This system is operated by an independent third- party provider and the reporting data are stored outside our company. The system allows you to report a possible concern in complete confidence and without the need to reveal your identity - unless you choose to do so.

5.2. What information is needed to file a report?

When filing a Report please provide any information you have available, and think could be relevant or may be useful. This will enable the recipient to assess the matter as quickly as possible. Examples of relevant information are a description of what you saw, heard or experienced; the relevant background; the reason for your concern; and the names, dates and places related to your concern. The information received will only be shared with others within or outside the company if and to the extent this is required to appropriately deal with the report and the issues raised in it.

5.3. Assessment of your Report

The reporting person will receive a receipt notice within seven (7) days of filing their report. Reported cases are handled by HR. HR will screen each reported case and determine whether it gives rise to a reasonable suspicion of a violation.

A report may be rejected if it's clear that the concern does not, and is unlikely to, constitute a violation.

Reports that qualify for further investigation will be investigated under instruction of HR and will start without delay.

Where reasonably possible and if your identity and contact details are known, you will be informed as to whether the matter will be investigated further or not and whether a different procedure may apply.

5.4. Investigation Process

HR has the sole authority and accountability to any investigation based on a submitted report. HR will determine the most appropriate investigation approach, which may include interviews, document reviews, data analysis, or desktop assessments. HR have the authority to instruct others to take temporary measures (e.g. to ensure that physical evidence or digital information is properly safeguarded).

Employees are required to cooperate with an investigation and to provide any available information and documentation requested by the investigator.

Employees who might be subject to the investigation may not participate in conducting the investigation.

Where reasonably possible and if your identity and contact details are known, within eight weeks of the date that you filed your Report, the investigator(s) will inform you of the status of the investigation. If they cannot provide that information within eight weeks, they will give you a new date when you may expect to receive a status update. Please note that the status update will only be an update on the status of the investigation and will not include any details relating to the investigation or any persons being investigated.

The HR Division leader may delegate responsibility for investigation of a minor violation to other parties within the organization, such as local manager and local HR, who then may at



their discretion, conduct the investigation locally. A violation can be considered as minor, if HR Division leader determines that the violation does not have any potential to cause, or it has not caused, material financial effect for Royal Terberg Group or affect adversely Royal Terberg Group's reputation.

External experts may be engaged when necessary, and any external support will be reminded of their confidentiality obligations before receiving any information.

In case conducting and/or completing the investigation requires further information from the reporting person and the reporting person does not react to enquiries within 60 days from such enquiry/information request, the investigation may be closed.

In case your Report raised a concern about (a) specific person(s), this/these person(s) will be informed by the investigator about the suspected violation during the course of the investigation. Royal Terberg Group will ask the person(s) to give their view on the alleged facts and - at a later stage - on the results of the investigation. If your identity is known, this/these person(s) will not be informed about your identity without your prior permission.

If the investigation concludes that concerns you raised in your Report are (partly) well-founded (i.e., a violation has taken place) then appropriate remedial measures will be taken. These can include disciplinary measures against the offender(s) and/or organizational measures (i.e. processes and procedures) to prevent such an incident from happening again.

The appropriate management level within Royal Terberg Group will execute the remedial measures.

Finally, where appropriate and if your identity and contact details are known, you will be informed as to whether a violation was found and, if so, that a decision was taken.

No further details can be given in view of both the privacy and legal position of the person(s) that your Report was about.

5.5 Post-Investigation

After the investigation has been completed, the personal data will be removed from the case file and the case will be marked, archived or closed.

6. PRIVACY

At Royal Terberg Group we are committed to protecting the privacy of everyone involved in the investigation to the fullest extent possible and in accordance with applicable laws. Any personal data obtained as part of any investigation set out in this policy will only be used for the purposes described in this document. Such data will only be given to those persons who need to know.

The only exceptions are if:

- Royal Terberg Group is under a legal or regulatory obligation to disclose the information
- or
- you filed a Report in bad faith.

In both these cases, disclosure of any personal data will only take place to the extent necessary to comply with applicable law or take the appropriate measures in respect of any bad faith reporting.

7. WHERE TO GO FOR MORE INFORMATION?

Please contact your (local) HR representative for more information on this Policy and process.

Any local deviations to this policy due to local/national legislation and/or industry needs, are documented separately in local policies or procedures. Please contact your local HR representative for more information on local specific policies and procedures.

8. OWNERSHIP, REVIEW AND APPROVAL

This policy is owned by the Group HR Director and the Group Legal Director.

This policy is reviewed by the HR Division Directors and approved by the Royal Terberg Group Board of Directors and its Extended Board.

Any changes to this Policy are reviewed by Group HR & Group Legal and approved by Royal Terberg's Board of Directors and its Extended Board.

Where local law requires policies in the local language, translations will be provided. In case of discrepancies, the English version prevails unless local law states otherwise.