

WHISTLEBLOWING POLICY

It takes years to build a reputation;
it only takes one breach to destroy it.
Let's act together.

WHO?

Everyone in the Spadel Group and our partners can flag issues

WITHIN THE SPADEL GROUP

- All employees (blue and white workers)
- Managers
- Shareholders
- Temporary workers

PROFESSIONAL PARTNERS

- Customers
- Suppliers
- Contractors and subcontractors

WHY?

Living by our values also means detecting breaches.

Daring to speak out and act in the public interest is the hallmark of a positive culture that our group aims to promote and protect.

WHAT?

Knowing our values and the rules makes our daily (working) environment safer

A whistleblower can report:

- Any illegal, dishonest or fraudulent behaviour, such as (but not limited to):
 - a crime or misdemeanour;
 - a breach of applicable laws, regulations and/or international treaties;
 - a breach of Spadel's contractual commitments;
 - an infringement of Spadel's Code of Conduct and/or other policies and procedures;
 - any other type of unethical or dishonest behaviour; (together « **Misconduct** »)
- Any present or past proven or suspected Misconduct
- Any Misconduct which they have witnessed, suffered or heard about

WHAT PROTECTION?

Maximum protection and confidentiality

- Absolute confidentiality
- The whistleblower can opt to remain anonymous
- Prohibition of any form of retaliation against the whistleblower and related parties:

There will never be any reprimand, retaliation, suspension, dismissal, discrimination or prejudice against a whistleblower who dares to report misconduct in good faith and without direct financial reward.

HOW TO REPORT?

An independent specialised whistleblowing system

1. Before reporting a Misconduct via the Whistleblowing Tool, the whistleblower is invited to first use the normal reporting channels:

for blue-collar workers:
their team leader or hierarchy

for white-collar workers:
their manager or their local HR manager

If, for any reason, the whistleblower feels uncomfortable or wary in reporting a Misconduct through the normal reporting channels, Spadel's internal whistleblowing tool offers an alternative channel through which they can report the Misconduct confidentially or anonymously.

2. The whistleblowing tool is available 24/7, 365 days a year, in two ways:

- either online on the platform: www.ethicspadel.com
- or by phone :
 - in Belgium: **0800.260.39**
 - in France: **0805.08.03.39**
 - in the Netherlands: **0.800.022.0441**
 - in Bulgaria: **0800.460.38**

- The whistleblowing report can be submitted to the local confidant or local HR manager and/or to the Group Legal Department
- Describe the Misconduct in detail: what, where, when, how, who?
- Be available and co-operative during the follow-up and the investigation