

Whistleblower Policy

1. INTRODUCTION

Montea is committed to creating a business culture that is characterised by honesty and integrity, a sense of responsibility, strict ethics and compliance with the statutory rules and corporate governance standards that apply to it.

These statutory and ethical rules and standards are described further in Montea's Corporate Governance Charter, Code of Conduct and other internal policies. All people working for Montea and its subsidiaries must adopt these rules and standards as their own and comply with these when performing their day-to-day responsibilities.

In spite of this commitment, you may one day observe conduct that concerns you, or that seems to violate the law or our internal rules. If you observe or suspect such misconduct, you are strongly encouraged to speak up. By doing so, you give Montea the opportunity to deal with the issue. Montea strongly encourages you to discuss irregularities with your supervisor. However, it is possible that you might not feel comfortable communicating and discussing irregularities with such person and/or this person is conflicted in relation to the irregularity concerned. Therefore, this Whistleblower Policy installs a formalized reporting procedure to give you the necessary means to report on irregularities in a confidential and safe manner.

2. SCOPE

Each (full-time, part-time, temporary, etc.) employee, trainee or applicant, each member of the board of directors and each person who provides services to Montea on an independent basis and has access to company information and is regularly involved in company activities, can report through the procedure installed by this Whistleblower Policy on each of the following irregularities (hereinafter referred to as an **irregularity** or jointly as **irregularities**):

- a reasonable suspicion of actual or potential violations of any legal rules applicable to Montea and its subsidiaries;
- a reasonable suspicion of actual or potential conduct that is contrary to Montea's ethical standards and principles as laid down in one of Montea's policies, including but not limited to the Corporate Governance Charter, Code of Conduct, Dealing Code, Supplier Code of Conduct and the Community Engagement Policy.

Examples of irregularities that can be raised include, but are not limited to, fraud, human rights violations, improper use of company resources, insider trading, disclosure of confidential information, violations of any of Montea's policies, discrimination or harassment, bribery, conflicts of interest and retaliation against anyone for speaking up in good faith.

Any third-party providing services to Montea not falling under the scope of this whistleblower policy is able to report irregularities through our reporting procedure for third parties, available on Montea's website.

3. INTERNAL REPORTING PROCEDURE

Within the framework of this Whistleblower Policy, irregularities can be reported to the Chief Human Resources Officer and/or the Secretary General (the person handling the report hereinafter also referred to as the **Complaints Officer**).

Reporting is possible by sending an e-mail to whistleblowers@montea.com or, at the discretion of the person reporting the irregularity, to the personal Montea e-mail address of the Chief Human Resources Officer or the Secretary General.

The whistleblower must make his or her identity known. Anonymous reports will not be followed up, but Montea reserves the right to further investigate such reports.

The report must contain at least the following information:

- the facts pointing to the irregularity;
- the nature of the irregularity;
- the name and, if applicable, the position of the person about whom the irregularity is being reported;
- the period or time to which the irregularity relates; and
- any evidence of the irregularity and any other element that the whistleblower deems relevant.

In his/her report, the whistleblower must exercise due care in ensuring the correctness of the information. A report must always be made in good faith and not for purposes of personal gain.

The Complaints Officer examines the report in a timely, consistent and fully impartial manner. The Complaints Officer has the right to hear persons and witnesses or to call on independent internal or external bodies to verify certain information.

During the handling of the report, the Complaints Officer is bound to confidentiality, also towards the board of directors and the executive management of the Company, unless immediate protective measures need to be imposed (in order to avoid the destruction of evidence). The Complaints Officer is no longer bound to confidentiality with regard to the whistleblower if he/she himself/herself breaches the confidentiality in breach of this internal procedure.

After examining the report and concluding that the report **is either well-founded or manifestly unfounded**, the Complaints Officer will deliver a recommendation (including a detail description and all supporting documents) to:

- the CEO, if the report concerns a person working for Montea, other than a director;
- if the report concerns a member of the board of directors or the CEO, the chair of the board of directors;
- If the report concerns the chair of the board of directors, the chair of the remuneration and nomination committee.

In all other cases, the investigation ends. The Complaints Officer will inform the CEO, or as the case may be, the chair of the board of directors or the remuneration and nomination committee, about the fact that a report was filed and has been investigated but was terminated after examination.

Montea will inform the whistleblower of the outcome of the investigation (in particular whether the report is (un)founded, and the measures to be taken) after having heard the person who committed the alleged irregularity and after having taken a decision in connection with the measures to be taken.

4. GUARANTEES FOR THE WHISTLEBLOWER

Unless the whistleblower has expressly indicated that he/she does not wish to be contacted or if the Complaints Officer would reasonably believe that this would prejudice the protection of the confidentiality of the investigation, the whistleblower will be kept informed of the further follow-up of his/her report as follows:

- confirmation of receipt of the report within seven (7) calendar days upon receiving the report, stating the following steps to be taken; and
- notification of the outcome of the investigation of the reported irregularity, whereby Montea aims for a resolution within thirty (30) calendar days of receiving the report.

The reported irregularity will be treated with the utmost confidentiality (with respect to the identity of the whistleblower, as well as the person about whom the irregularity is reported).

During and after the processing of the report, the Complaints Officer may not communicate the identity of the whistleblower, nor disclose elements that make it possible to identify his/her identity, unless this is absolutely necessary in the context of the investigation and/or to remedy the irregularity and in any case never without the prior consent of the whistleblower. The whistleblower is also expected to treat the submission and handling of his/her report as strictly confidential.

Furthermore, Montea will ensure that a whistleblower (including its family members and affiliated persons) acting in good faith does not in any way suffer any negative consequences as a result of or in connection with a report. The fact that after investigation of the alleged irregularity it would be shown that the report is unfounded is irrelevant.

The above protection is not guaranteed for the person who makes a report in bad faith (i.e., intentionally makes false statements; himself or herself participated in the irregularity; makes a manifestly unfounded report or makes such a report frivolously or with bad intentions).

5. POSITION OF THE PERSON ABOUT WHOM THE IRREGULARITY IS REPORTED

The person about whom an irregularity is reported must cooperate with the Complaints Officer and has to submit all relevant information, documents or other materials to the latter at the request of the Complaints Officer.

The Complaints Officer informs the person about whom the irregularity is reported in due time about the existence of a report. In particular, the Complaints Officer communicates the following information:

- the alleged facts; and
- the internal or external departments/services to which the data of the report and/or the result of the investigation can be communicated.

However, the Complaints Officer reserves the right to postpone this notification in exceptional circumstances and/or in the interests of the investigation (e.g., if there is a risk that the necessary evidence will be destroyed or manipulated).

6. CONSEQUENCES AND POSSIBLE SANCTIONS

If it should appear that the **report is well-founded**, Montea will use everything reasonably possible to address and remedy the established irregularity. Montea will inform the person who has committed the irregularity about the measures it intends to take as a result of the irregularity.

If it should appear that the report is **manifestly unfounded**, Montea will inform the person about whom the irregularity was reported of the unfoundedness of the report. Montea will inform the whistleblower about the measures it intends to take as a result of a manifestly unfounded report.

Upon completion of the investigation by the Complaints Officer, Montea, in the case of a well-founded report (with respect to the person who committed an irregularity) or in the case of a manifestly unfounded report (with respect to the whistleblower), may impose an appropriate sanction depending on the nature and severity of the violation. Sanctions may include, but are not limited to, disciplinary measures (including suspension/termination of employment/providing services on an independent basis to Montea) and are without prejudice to the possibility for Montea and/or third parties to prosecute the person who committed an irregularity civilly or criminally.

7. POSITION OF COMPLAINTS OFFICER IN THE CONTEXT OF THIS INTERNAL PROCEDURE

The Complaints Officer must be able to perform his/her duties in full autonomy and in an independent manner without receiving instructions from others.

Each report is handled with the utmost discretion by the Complaints Officer.

If the Complaints Officer considers that he or she cannot handle a report, either because he/she would be directly or indirectly involved in the report or on another reasonable ground, he/she should report this immediately to the CEO or, as the case may be, the chair of the board of directors or the remuneration and nomination committee (in line with the reporting rules set forth in section 3), who will appoint an ad hoc Complaints Officer.

8. PROCESSING OF PERSONAL DATA IN THE CONTEXT OF THE WHISTLEBLOWER POLICY

The submission, processing and investigation of reports in the context of this Whistleblower Policy involves the processing of personal data of the persons involved. Montea NV is responsible for the processing of the personal data exchanged in the context of the procedure set out in this Whistleblower Policy.

Personal data exchanged in the context of this Whistleblower Policy is used for investigating the report, with a view to taking any measures or sanctions after a report, and with a view to defending the interests of Montea or third parties in court.

The legal basis for the processing of personal data within the context of this Whistleblower Policy consists of the legal obligation of Montea to provide adequate internal procedures for reporting actual or potential irregularities pursuant to the Belgian act of 28 November 2022 on the protection of reporters of breaches of Union or national laws established within a legal entity in the private sector, including its implementing decrees, and to enforce compliance with ethical standards, Montea's Corporate Governance Charter, Code of Conduct and other internal policies.

Montea may transfer personal data to external consultants, competent authorities and supervisory authorities.

If a report proves unfounded, Montea will remove personal data within a reasonable period of time. If a report proves to be well-founded or if a report is manifestly unfounded, Montea will retain personal data as long as necessary with a view to taking measures or sanctions or with a view to its defence in court.

Persons whose data are processed in the context of a report of an irregularity have the right to access their personal data. They may have their personal data rectified or ask for their personal data to be erased or the processing thereof to be restricted. They may also object to the processing of their personal data on compelling legitimate grounds.

The exercise of the above rights may be subject to conditions. These rights do not imply any right of access to personal data of other persons.

Persons whose data are processed in the framework of a report of an irregularity also have the right to lodge a complaint with the supervisory authority (in Belgium: the Data Protection Authority, see: <https://www.gegevensbeschermingsautoriteit.be/burger/acties/klacht-indienen>).

9. REGISTER OF REPORTS

The Complaints Officer keeps a register of all received reports, which is only accessible to him/her. The register shall state the follow-up given to the report, the reasons underlying the decision whether or not to investigate the report and, if applicable, the action taken to remedy the irregularity.

In the event that the register has to be made public (for example as a result of a request from the FSMA, or in the context of an internal or external audit), the details of the whistleblower can be anonymised.

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