



neways

Neways Electronics International N.V.

Whistleblower (Speak Up) Policy

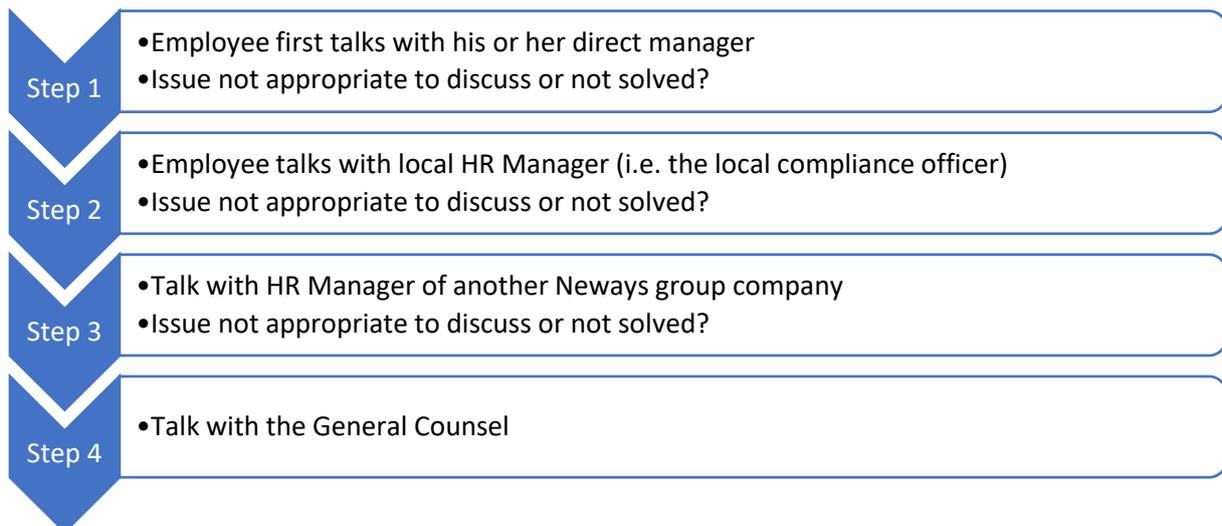
Management Approval

The Management Board of Neways Electronics International N.V. (together with all of its direct and indirect subsidiaries, **Neways**) adopted the following policy on 6 November 2023 as anyone working within Neways should feel **safe** and encouraged **to speak up**.

Introduction

Raising your voice is essential to sustain our reputation and values, both now and in the future. Therefore we encourage you to raise your voice if you believe that you discover something in conflict with our Code of Conduct or any other policy. This Policy applies to all personnel. Generally, if you notice something that you believe is in conflict with Neways' core values, Trust, One Team, Passion, Innovation, Customer Focus, the Code of Conduct or any other policy, we encourage you to first talk to your direct manager about it. If that is not appropriate or if it does not resolve the issue, you can talk to your local HR manager or to the HR manager of another Neways group company. Does this still not resolve the issue, please contact the General Counsel. If the suspicion of social wrongdoing involves a person that is indicated to be the person to whom a report should be filed, the reporter can then report to a Neways employee with a similar role.

Neways encourages you to raise concerns internally through the flowchart.



Commitment to Communicate to Personnel and External Stakeholders

This Whistleblower Policy (and its translations) will be communicated within the organisation after each amendment and is at all times accessible for our Personnel (as defined below) through Neways4U and may be obtained at the HQ and local HR office. Our external stakeholders may obtain a copy of this Whistleblower Policy through our corporate website and are generally provided a copy at the start of our joint engagement.

1. Definition

For the purposes of this policy, the following definition shall apply:

Personnel: the directors, officers, full-time, part-time, seconded employees and trainees of Neways.

Suspicion of social wrongdoing: the suspicion of an employee that, within Neways or at another organization if he or she has come into contact with that organization through his or her work, there is serious wrongdoing insofar as:

(a) the suspicion is based on reasonable grounds, arising from knowledge gained by the employee in his or her employment with Neways or from knowledge gained through his or her work with Neways; and

(b) the social interest is at stake because of:

(i) a(n) (imminent) violation of a statutory regulation;

(ii) a(n) (imminent) danger to public health;

(iii) a(n) (imminent) danger to the safety of persons;

(iv) a(n) (imminent) danger to the degradation of the environment;

(v) a(n) (imminent) danger to the proper functioning of the organization as a result of an improper act or omission;

(vi) a(n) (imminent) threat of the deliberate withholding, destruction or manipulation of information about facts and circumstances referred to under (i) to (v).

2. Information and advice

2.1 An employee may consult an independent professional advisor bound by confidentiality undertakings in confidence about a suspicion of wrongdoing.

2.2 For employees in the Netherlands, in accordance with paragraph 1, the independent Dutch Advisory Point for Malpractice (*Het Adviespunt Misstanden*) can be requested for information, advice and support regarding the suspicion of malpractice. See <https://huisvoorklokkenluiders.nl/> for more information.

3. Internal Report

3.1 An employee may report a suspicion of social wrongdoing within Neways to an appointed confidential adviser and/or in accordance with the flowchart set out above.

3.2 An employee of another organization who has come into contact with Neways through their work and suspects wrongdoing within Neways may report it to an appointed confidential adviser, the General Counsel or the CEO of Neways.

4. Protection of the reporter and other persons involved against disadvantage

4.1 Protecting the reporter is of utmost importance. Neways will not disadvantage the reporter in connection with the reporting in good faith and properly of a suspicion of wrongdoing at Neways.

4.2 Neways will endeavour to ensure that managers and colleagues of the reporter refrain from any form of disadvantage in connection with the good faith and proper reporting of a suspicion of wrongdoing, which impedes the professional or personal functioning of the reporter.

4.3 Neways will conduct an investigation in accordance with this policy.

4.4 If appropriate following the outcome of the investigation, Neways will impose disciplinary measures on employees who are guilty of harming the reporter, at its discretion.

4.5 If the reporter believes that there has been detriment, he or she may discuss this without delay with the person to whom the report was made. This person and the reporter also discuss what measures can be taken to prevent the disadvantage. The person to whom the report was made in accordance with the flowchart above shall ensure that this is recorded in writing, and shall submit this record to the reporter for approval and signature. This report shall be forwarded to the CEO without delay, and the reporter shall receive a copy of it. Furthermore, the report shall be confidentially saved on Neways' document management system.

5. Treating the report as confidential

5.1 Neways will ensure that the information about the report is kept in such a way that it is accessible only to those who are involved in the handling of the report and that it is treated confidentially at all times.

5.2 Without the explicit written consent of those involved in the reporting of suspected wrongdoing, the identity of all those involved in the processing of a report will be kept unknown.

5.3 If the suspicion of misconduct is reported through the confidential adviser and the reporter has not given permission to disclose his or her identity, all correspondence about the report will be sent to the confidential adviser and the confidential adviser will forward this to the reporter without delay.

6. Recording and receiving the internal report

6.1 If the employee reports a suspicion of wrongdoing to the CEO or provides a written report with an oral explanation, the CEO, in consultation with the reporter, will ensure that a written record is made of the report and will submit this record to the reporter for approval and signature. The reporter will receive a copy of this.

6.2 If the employee reports a suspicion of misconduct through a confidential adviser, the recording procedure will be as described in paragraph 1, whereby "CEO" in this paragraph can be read as "confidential adviser".

6.3 The CEO shall immediately send the reporter a confirmation of receipt, which shall in any case contain a business description of the report, the date of the report and a copy of the report.

7. Handling of internal reports

7.1 The CEO will initiate an investigation of the reported suspicion of misconduct unless:

- (a) the suspicion is not based on reasonable grounds, or
- (b) it is clear in advance that the reported suspicion of misconduct does not relate to the company.

If, based on the above, the CEO decides not to initiate an investigation, the reporter will be informed by HR of this in writing within two weeks of the report being made. If the CEO decides to initiate an investigation, the following provisions will be observed.

7.2 The CEO will determine whether an external party must be informed of the report. Unless there are serious objections, the CEO will send the reporter a copy of this assessment.

7.3 The CEO assigns the investigation to investigators who are independent and impartial and informs the reporter of this in writing.

7.4 The CEO will inform both the reporter and the persons to whom the report relates about the report and about the informing of an external party, unless this could harm the interests of the investigation or the interests of enforcement.

7.5 If it is decided to launch an investigation into the reported suspicion of misconduct, the investigators will give the reporter and others involved the opportunity to be heard. The investigators shall submit the written findings for approval and signature to the person heard and provide him/her with a copy of the findings.

7.6 The investigators will draw up an investigation report and send a copy to the reporter, unless there are serious objections.

7.7 The notifier will be given the opportunity to respond to the investigation report and the position as referred to in this article. If necessary, a new or amended investigation report will be drawn up.

8. Position of Neways

8.1 Within a period of eight weeks from the moment of the report, the reporter will be informed in writing of the position taken with regard to the reported suspicion of misconduct. The steps taken as a result of the report will also be indicated.

8.2 If the position cannot be given within the period of eight weeks, the reporter will be informed of this in writing and he will be informed of the term within which he or she can expect the position to be given.

8.3 Neways will give the notifier the opportunity to respond to the investigation report and Neways' opinion. If the notifier indicates, in response to the investigation report or the position taken by Neways, that the suspicion of wrongdoing was not investigated properly or that the position taken by Neways contains material errors, Neways will respond to this in terms of content and, if necessary, launch an additional or new investigation.

8.4 After completion of the investigation, the CEO will decide whether an external party must be informed of the investigation report and Neways' position within a reasonable period of time.

8.5 The persons to whom the report relates will be informed in the same way as the reporter, unless this could harm the interests of the investigation or of enforcement.

9. External report

9.1 A person reporting can (preferably after making an internal report) make an external report to the Whistleblower's House (*Het Huis van Klokkenuiders*) in accordance with Dutch law, if:

- (a) an internal report cannot reasonably be required of the reporter;
- (b) the report is not handled or dealt with properly internally; or
- (c) there is an external obligation to report. See <https://huisvoorklokkenuiders.nl/>

10. Taking effect of regulations, repeal of current regulations

10.1 These regulations will take effect on 6 November 2023.

10.2 These regulations will be cited as the reporting arrangement for dealing with the reporting of a suspicion of social wrongdoing at Neways.

10.3 Periodically (or as much earlier or more often as desired), this regulation will be evaluated together with the works council (if any) and it will be determined whether changes are required.

11. Appointed persons

11.1 The confidential adviser for purposes of this policy at Neways is Joan Leeuwenburg (internal) and the General Counsel can provide access to any external confidential adviser. Their phone numbers can be obtained from Neways4U.

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Effective 6 November 2023

Approved by the Management Board and the
Supervisory Board

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