

Speak Up Policy

Ordina encourages everyone who carries out work for the company – or collaborates with us – to report any instances of suspected misconduct, such as an infringement of laws or regulations, the Code of Conduct or the accompanying policies. We take all reports seriously. Where necessary, we will take action.

Ordina will not allow those who express concerns, or report a case of misconduct, to experience adverse consequences for their actions in the performance of their work.

Introduction

Ordina greatly values honesty, transparency and integrity. The Code of Conduct and its accompanying policies are a key part of this. We want to ensure that anyone who undertakes work for Ordina, or collaborates with us, respects and abides by our values. If this is not the case, we would like to hear about it as soon as possible, to enable us to take steps towards improving the organisation. It is your role to help us with this.

In our company, we want to create a climate in which you feel free to express concerns and to report any suspicions you may have of misconduct.

It will not always be clear if a particular action or behaviour is a breach of laws or regulations, the Ordina Code of Conduct or the accompanying policies. But the 'moral compass' in all of us may send warning signals. In these cases, Ordina would prefer you to share your concerns rather than keep them to yourself.

This Speak Up Policy explains how and where you can make a report.

When can you make a report on the basis of this Speak Up Policy?

In the first instance, this policy is for internal use. Everyone who carries out work for Ordina, regardless of contract type (temporary, permanent, agency workers, interns, external and hired-in staff) may make a report. Therefore, you may also do so if you have been seconded to a client by Ordina.

Ordina's business partners (such as suppliers and clients) can make use of this Speak Up Policy if they have a suspicion of misconduct involving someone who works for (or with) Ordina. They can contact the Compliance Officers directly; business partners may not use the Confidential Compliance Councillors or the external SpeakUp line.

A report may relate to many different types of misconduct, or a suspicion of these:

- Discrimination
- Bribery
- Conflicts of interest
- Insider information
- Improper use of company resources
- Fraud
- Careless handling of confidential information
- Unfair competition

We urgently ask everyone to report any suspicions of misconduct. As an Ordina employee, if you think that criminal offences may have been committed (such as fraud, bribery, theft or unfair competition) you are in fact under obligation to report this.

This Speak Up Policy is not intended to be a means of channelling complaints about conditions of employment. Furthermore, this Speak Up Policy does not replace the existing procedures for individual complaints, for example with regard to HR assessments.

Who can you approach?

The first step

We hope that, as a member of our staff, you will feel free to share any concerns you may have about questions that fall within the scope of this Speak Up Policy with your line manager, in the first instance. This is also the best way to create a positive, open working environment throughout the organisation.

“In our company, we want to create a climate in which you feel free to share your concerns and to report any suspicions of misconduct.”

The next steps

If, for whatever reason, you would prefer not to talk to your line manager, you can contact:

- Your local Compliance Officer
- Your local Confidential Compliance Councillor
- The external SpeakUp line

Confidential Compliance Councillor (one for the Netherlands and one for Belgium/Luxembourg). You can approach your local Confidential Compliance Councillor to report misconduct or a suspicion thereof. The Confidential Compliance Councillor will keep your identity secret. He/she can pass on any suspicions you have reported to the local Compliance Officer.

- You can find contact information for your local Confidential Compliance Councillor on Connect.

Local Compliance Officer (one for the Netherlands and one for Belgium/Luxembourg). You can also approach your Local Compliance Officer to report misconduct or a suspicion thereof.

- You can find contact information for your local Compliance Officer on Connect. Ordina's business partners will find the contact information on our website.

External SpeakUp line: If it is impossible or undesirable to report misconduct or a suspicion thereof through the channels outlined above, you can make use of the external and anonymous SpeakUp line. You can make a report to them either over the phone or on the internet, in your native language (Dutch or French) or in English. The SpeakUp line is a free and confidential service that is available all day.

- You can find more information about approaching the SpeakUp line on Connect.

Whether you share your concerns in person, or by email, letter or phone, you should always communicate as much detailed information as possible. Try to include:

- The background and your reason for reporting
- Data, places, and if possible people's names and other concrete information
- Examples of the behaviour in question
- Any documents that may be relevant to the situation

It is also good to mention whether you have already discussed the situation with someone, and if so, with whom and when.

We can only follow up a report if we have sufficient leads to enable further investigation.

How are reports handled?

If you make a report to a Compliance Officer, you will receive a confirmation of receipt within 10 days. In cases where the Confidential Compliance Councillor has forwarded your report to the local Compliance Officer, you will also receive – via the Confidential Compliance Councillor – a confirmation within 10 days.

If you make a report via the external SpeakUp line, the report will be forwarded anonymously to the Compliance Officer in the Netherlands. (If the report relates to the behaviour of the Compliance Officer, the report will be sent to the Board of Directors.)

In the first instance, the Compliance Officers will judge if there is a basis for further investigation. They may decide not to proceed with further investigations after a report has been made. This will happen if the matter is covered by a different regulation, or if there is insufficient information available (and there is no prospect of collecting further information).

Furthermore, no investigation will be initiated if the report is deemed to have been made with malicious intent.

The Compliance Officers report periodically to the Compliance Commission about the reports

they have received, including the reports that have not led to further investigation. The Compliance Commission can still decide to start an investigation as a result of the latter.

The Compliance Commission is made up as follows:

- HR Director
- Privacy Officer
- Assurance Director
- The two local Compliance Officers

Matters judged to warrant further investigation are immediately investigated by the local Compliance Officer, under the supervision of the Compliance Commission. The Compliance Officers may involve both Ordina staff and external parties (e.g. lawyers or external accountants) in the investigation.

When it has been determined that there is a question of non-compliance with laws or regulations, the Code of Conduct or policies, the Compliance Commission makes a proposal to the Board of Directors as regards measures to be taken; these could be disciplinary measures, but could also be measures designed to prevent repetition. The Compliance Officers see to it that the measures approved by the Board of Directors are implemented.

As the reporting party, you will hear from the Compliance Officers whether misconduct has been confirmed. We will be unable to provide you with further details, due to the regulations governing confidential information protection and privacy protection.

Dealing with a report may take some time. If it takes longer than eight weeks for the outcome to be known, you will receive a message outlining how much longer the investigation is likely to take.

How do we protect your anonymity?

We deal with all reports in complete confidence. If you make a report to your local Compliance Officer, they will of course know your identity. If you wish to remain completely

anonymous, you can approach the external SpeakUp line.

The Compliance Officers may not reveal your identity without your permission, except:

- If there is a legal obligation to reveal your identity;
- If it becomes apparent that the report has not been made in good faith;
- If it is necessary on important public interest grounds.

If the investigation into a report is hindered by your anonymity, we will nevertheless ask your permission to divulge your identity. If your identity is divulged, then it will only be revealed to the people who need this information within the framework of the report.

No adverse effects

If you make a report in good faith, you will be protected and you will experience no adverse effects of this in the performance of your work. If you feel that you are experiencing adverse effects, please make this known through one of the channels set out in this Speak Up Policy so that Ordina can take the necessary steps to address this..

You may have taken part in the undesirable behaviour you are reporting. When dealing with a report of this kind – and when deciding on possible disciplinary measures – Ordina will bear in mind that you were the person who brought the matter to light.

Ordina will assume that you are making a report in good faith. If further investigation reveals that no misconduct has taken place, you do not need to worry that measures will be taken against you, provided that you have acted in good faith.

Guarantees for the position of the person(s) to whom the report relates

Keeping the person(s) informed

Person(s) who, according to the report, are involved in the relevant case will be informed about the report. This will be done as soon as

possible, unless the investigation would be severely hindered by this.

Privacy

When processing personal data within the framework of this Speak Up Policy, we will act in strict accordance with the relevant rules.

Implementation

The Board of Directors will ensure that this Speak Up Policy is introduced. Managers will ensure that their staff are familiar with this Speak Up Policy.

Evaluation and Reporting

As part of the Business Management Review, an annual evaluation by the Executive Committee of this Speak Up Policy will take place.

The Compliance Officers are to report on a quarterly basis to the Board of Directors and on a biannual basis to the Supervisory Board on the reports received, the nature and status of investigations and their outcomes.

Ordina stands for every company in which Ordina N.V. has a majority interest, either directly or indirectly, or over which it has control.

This Speak Up Policy replaces the earlier Whistle-blowers' Scheme and take effect on 23 January 2015.