

Reporting Regulation on Misconduct and Business Integrity Violations

Delft, December 2023

1 General

- 1.1 For reporting (suspicion) of a business integrity violation or misconduct, Prime Vision has established the Reporting Regulation on Misconduct and Business Integrity Violations (hereafter: the Regulation). According to the Whistleblower Protection Act (WPA, Feb. 18, 2023), such a regulation is mandatory for companies with more than 50 employees. An employee must be able to safely report suspected integrity violations and misconduct. He or she must not suffer any disadvantage from making the report. The regulation describes the process that is followed when an employee wants to report a suspected misconduct or business integrity violation.
- 1.2 The regulation is for reporting situations that harm Prime Vision and/or the public interest. The regulation allows Prime Vision to investigate and assess a report internally. Also, this regulation shows how a report can be made.
- 1.3 Individuals who have a working relationship with Prime Vision may also make a report of misconduct or violation of business integrity. A reporter can also be self-employed (such as a consultant, freelancer, contractor or supplier), a director, volunteer, intern, former employee or job applicant. What is important is that the reporter will be, is, or has been doing work for Prime Vision.
- 1.4 A person can only be considered a reporter within the meaning of the WPA if he or she has a reasonable suspicion of misconduct or business integrity violations and has concrete and reliable indications to that effect.
- 1.5 A reporter is always a natural person. Companies or other organizations cannot report under the WPA.

1.6 The Regulation can be found at www.primevision.com and via the internal Prime Vision intranet.

Persons hired at Prime Vision as permanent, temporary or external employees, including interns and work-study students, will be sent a copy of these regulations as part of the onboarding process.

2 Scope

2.1 The Regulation can be invoked when there is a potential business¹ integrity violation or social misconduct, where Prime Vision and/or the public interest could be harmed if not addressed.

2.2 It may involve an act or, conversely, an omission that involves one or more of these characteristics:

- Violation of European law or internal rules established by Prime Vision.
- Public health hazard.
- Danger to the safety of persons.
- Risk of environmental degradation.
- Danger to the proper functioning of the organization due to improper acts or omissions.

2.3 In each case it is assessed whether there is an event that affects the company interest and/or social interest. The Regulation is not intended for reporting individual issues such as a (labor) conflict or a situation of undesirable behavior towards an employee.

2.4 For individuals who wish to report a situation that affects themselves or a colleague personally, the Social Integrity Violation reporting guidelines exists within Prime Vision. This may include harassment, discrimination, sexually transgressive behavior or intimidation. Social integrity is outside the scope of this Regulation.

¹ We distinguish two forms of integrity: business integrity and social integrity.

- 1 Business integrity is about morally (in)right behavior by employees toward the organization. Examples include fraud, corruption or improper use of authority or assets.
- 2 Social integrity is about undesirable behavior. Examples include bullying, aggression, discrimination or sexual harassment. So social integrity is about how employees treat each other.

3 Procedure

- 3.1 Reporter contacts one of the external confidential counselors [Margriet Maris \(Dutch, English\)](#), or [Els van Leeuwen \(Dutch\)](#). The confidential counselor facilitates the reporter in two ways: giving advice (see 3.2) and facilitating that the report is addressed to the designated person (see 3.4).
- 3.2 A reporter has the right to consult a confidential counselor about making a report. Prime Vision advises employees who are considering making a report to present that intention to one of the external confidential counselors. The advisor can offer advice and help a reporter get started. The confidential counselors will also verify with the reporter to determine whether the report is anonymous.
- 3.3 A reporter also has the right to a counselor/specialist. This is someone whom the reporter trusts and who, by virtue of their profession, has a duty of confidentiality. This can be the external confidential counselor, but also, for example, someone from a trade union, a lawyer from legal aid insurance or from the [Dutch Whistleblowers Authority](#).
- 3.4 A suspicion of misconduct or business integrity violation can be made orally or in writing (digitally). However, the reporter must finally confirm a verbal report in writing. Written reports are addressed to one of the external confidential counselors. They determine whether the report is passed on to the statutory director or the representative of the majority shareholder (in case the report concerns the statutory director).
- 3.5 Director or supervisor evaluates the report confidentially. This means that the identity of the reporter is not shared with others without the reporter's permission (which is default in case of anonymous reports). The report is also not communicated unnecessarily. In short: the circle of persons familiar with the report is kept as small as possible.
- 3.6 After the report is made, the reporter will receive an acknowledgement of receipt within seven days (through the external confidential counselor if applicable). If the reporter is satisfied with the confirmation of receipt, he/she must sign and date it. The recipient of the report also indicates when the report will be turned over to the person evaluating the report.

- 3.7 No later than three months after the confirmation of receipt, the director/supervisor informs the reporter of the assessment of the report and explains what follow-up steps have been and/or will be taken. Even if the report is not followed up, the reporter is informed and the director/supervisor will provide the reasons for this decision.

4 Protection from harm

- 4.1 When a reporter has reported a (suspected) business integrity violation or misconduct, based on reasonable suspicion, he/she is protected from harm. The reporter may not suffer negative consequences from Prime Vision as a result of the report. For example, dismissal, harassment, termination of a collaboration or breach of contract. This also applies to those who assisted the reporter with the report, such as the confidential adviser and colleagues involved.
- 4.2 If a reporter still feels that she/he is being or has been harmed, the reporter can take legal action or ask the [Dutch Whistleblowers Authority](#) to investigate.
- 4.3 The reporter must be able to prove that he or she made a report and was prejudiced. A judge will assume that the harm resulted from the report. Prime Vision will then have to prove that it was not.

5 Reporting and evaluation

- 5.1 Every year the director has a report drawn up by the external confidential counselors on the number of reports and their handling. The Works Council, Management Board and Shareholder representatives will be informed accordingly.

6 Entry into force

- 6.1 This Reporting Policy on Abuses and Integrity Violations will take effect on December 17, 2023.