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## Whistleblowing Policy

### The purpose of a whistleblowing system

Whistleblowing means that someone with a work-related connection within a company, an organisation or a public authority informs the management if there is an irregularity of some sort. The term also applies when an outside party reports an issue. The purpose of whistleblowing is to identify serious irregularities within the company. Offering employees, contractors or other external parties an opportunity to report irregularities completely anonymously also increases the chances of identifying risks at an early point and implementing suitable measures.

### Policy statement

In line with AQ's values and ethical rules, we will operate in accordance with the law and good business ethics. This policy aims to:

- Provide employees, contractors, business associates and other stakeholders with an opportunity to raise concerns about serious wrongdoing
- Ensure that matters concerning wrongdoing are treated seriously and appropriately
- Guarantee that anyone who reports wrongdoing is protected from reprisals.

Concerns can be reported at AQ using the e-mail address [whistleblower@aqgroup.com](mailto:whistleblower@aqgroup.com)

This e-mail address can also be found on AQ's website in the sections entitled Sustainability and Policy.

This policy is intended for serious wrongdoing that could have a negative impact on AQ's operations and business and which, due to the nature of the issue, cannot be reported through normal procedures.

### Examples of serious irregularities are:

- Unlawful activity
- Financial fraud (e.g. manipulation of accounts, non-compliance with internal control procedures, embezzlement or false claims)
- Bribery or corruption (e.g. conflicts of interest, bribery, sponsorship and donations, gifts or facilitation payments)
- Breaches of competition legislation (e.g. price-fixing agreements, exchange of price sensitive information, collaborations that restrict fair competition)
- Activities that pose a serious threat to the environment, health and safety
- Activities that by law or under a contract or agreement are regarded as serious improper conduct (e.g. discrimination, child labour, human rights violations).

Individuals who suspect wrongdoing should first discuss the matter with their supervisor, manager or other appropriate personnel at the company, unless the matter cannot be raised locally. In this case, [whistleblower@aqgroup.com](mailto:whistleblower@aqgroup.com) is available. Matters concerning conditions of employment or the local workplace, such as conflicts with colleagues or managers, disciplinary measures, correct payment of salaries and benefits, should normally be resolved locally unless

the matter is exceptionally serious, as described above, or cannot be reported through normal procedures.

### **Confidentiality**

All communication with [whistleblower@aggroup.com](mailto:whistleblower@aggroup.com) will be anonymous and confidential unless you have clearly indicated otherwise. We recommend that you identify yourself and explain your concerns in detail in order to make investigating the matter easier. Follow-up questions and an investigation may not be possible unless the source of the information can be identified. To assist AQ in conducting a thorough investigation, we ask that you provide as much information as possible.

AQ will treat all concerns and issues raised in confidence. An exception may be made if this is necessary in order to be able to conduct a complete and fair investigation. The identity of the whistleblower will always be kept confidential.

### **No discrimination or retaliation**

AQ will ensure that there is no discriminatory or retaliatory action against any employee or third party who reports a matter to AQ based on his/her personal knowledge.

If a person thinks that he or she has suffered reprisals after having reported a concern or participated in an investigation, he/she must immediately report this to the Group HR manager. All such reports will also be investigated in confidence.

### **Receipt and retention**

All reports will be received by the Group HR manager, who will (i) record all reported concerns, (ii) assess the seriousness and credibility of the matter, and (iii) take appropriate action. Certain matters or concerns may be resolved without the need for an investigation.

When filing a report to [whistleblower@aggroup.com](mailto:whistleblower@aggroup.com) the sender will receive an immediate reply that the report has been delivered to AQ.

The Group HR manager may consult with all or parts of the group management. He or she may also employ external auditors, investigators and/or legal advisers to assist in the investigation and the analysis of the results.

The conclusions of the investigation will be passed to AQ's group management, which may decide to submit an investigation report to the Board of Directors of AQ Group, depending on the seriousness and the scope of the violation.

### **Further action**

If an investigation reveals a violation of this policy, appropriate measures will be taken.

### **Retention of documentation**

AQ will retain a copy of all reports, investigation reports and any other relevant documentation. AQ's group management will determine a retention period for the documents at AQ, taking into account the applicable legislation.