

Pauwels Consulting Group Whistleblower Protocol Belgium(2023)

The entire Pauwels Consulting Group (Pyramid NV together with its direct and indirect subsidiaries ("Pauwels Consulting")) operates a transparent and fair business with respect to democratic rules and enables trust in people. We are committed to detecting and preventing fraud, misconduct, breaches of security, data protection, etc.

All employees, executive management and the board of directors of Pauwels Consulting as well as other persons doing business with and/or advising Pauwels Consulting are encouraged to report any breach of the Pauwels Consulting Code of conduct and suspicious acts or omissions that could harm our employees, Pauwels Consulting, customers and the society we are a part of, as Pauwels Consulting adheres to the Ten Principles of the UN Global Compact

(<https://www.unglobalcompact.org/what-is-gc/mission/principles>).

With your help, we can ensure Pauwels Consulting's continuous integrity, trust and reliability which are values we have been highly committed to since the foundation of Pauwels Consulting.

What should be reported?

- Whistleblowing may only be used to report breaches on the following areas contracts
- financial services, products en markets, prevention of money laundering and financing of terrorism
- product safety and conformity
- safety of transport
- protection of the environment
- radiation protection and nuclear safety
- safety of food and animal feed, animal health and well being
- public health
- consumer protection
- protection of privacy, personal data and safety of network and IT systems
- fight against tax fraud
- fight against social fraud
- the financial stakes of the European Union
- the internal market of the European Union

The whistleblower system may only be used for filing reports in good faith so please consider safeguarding our culture of trust, integrity, and dialogue. This whistleblower protocol is not meant to replace the "Open Door Policy". You are always welcome to talk to a Business Unit Director or Pauwels Consulting management.

How to file a report?

Internal report

We have mandated Mélodie Rogiers, our HR Director, to oversee the whistleblower filings ("Whistleblowing") and the Investigation team handling the process. Please report incidents in writing on <https://pauwelsconsulting.com/whistleblower/> where Mélodie will receive the anonymous submissions. The receiving of this report will be confirmed within seven days. Once Mélodie has reviewed a submission, our chair of the board of Directors and the Managing Director will receive the report ("Investigation team"). Within reasonable time and no later than three months after confirmation of receipt you will receive feedback from Mélodie.

You can also contact Mélodie Rogiers directly by email (melodie.rogiers@pauwelsconsulting.com), by post (Pauwels Consulting NV, t.a.v. Mélodie Rogiers, Woodrow Wilsonplein 16, 9000 GENT, Belgium) or you can call her at +32 9 324 70 80.

As a Pauwels Consulting employee, we encourage that you initially contact your Business Unit Director, provided that you feel comfortable disclosing your issue to him/her. We encourage you to disclose your identity when reporting is instated to ensure a fair and unbiased treatment of all filings, but you can also choose to stay anonymous, because all filings are treated in a confidential manner.

Please state an email address/phone number for further contact from the investigation team. If you want full anonymity, then please use a non-personal- or business-related e-mail address and state you prefer full anonymity. You can also use the web form on this page <https://www.pauwelsconsulting.com/whistleblower/> without disclosing any personal information.

External report

You can also file an external report to the Federale Ombudsman which functions as federal coordinator for external reports. The Federale Ombudsman will receive your report, check if it is admissible and if there is reasonable presumption that the reported violations have taken place and, if this is the case, forward your report to the authority competent to investigate the violation.

You can contact the Federale Ombudsman directly per e-mail (contact@federaalombudsman.be), per post (De Federale Ombudsman, Leuvenseweg 48 bus 6, 1000 BRUSSEL, België), by telephone (+32800 99 961) or via their website (<https://www.federaalombudsman.be/en>).

Additionally, you can file direct reports to the competent authorities as designated by KB tot aanduiding van de bevoegde autoriteiten voor de uitvoering van de wet van 28 november 2022 betreffende de bescherming van melders van inbreuken op het Unie- of nationale recht vastgesteld binnen een juridische entiteit in de private sector, BS 31 januari 2023 (https://www.ejustice.just.fgov.be/doc/rech_n.htm).

Responsibilities and Investigations

Reasonable care should be taken in dealing with suspected misconduct to avoid

- Baseless allegations;
- Premature notice to persons suspected of misconduct and/or disclosure of suspected misconduct to others not involved with the investigation;
- Violations of a person's rights under law.

Due to the important, yet sensitive, nature of the suspected violations, effective professional follow-up is critical. Business Unit Directors should not perform any investigative or other follow-up steps on their own. Accordingly, a Business Unit Director who becomes aware of suspected misconduct should report it to the Investigation team, and should not without prior permission take steps on his or her own to do any of the following:

- Contact the person suspected to further investigate the matter;
- Discuss the case with attorneys, the media, or anyone other than the Investigation Team;
- Report the case to an authorized law enforcement officer without having Pauwels Consulting discussing the case with the Investigation team.

Investigation procedure

All relevant matters, including suspected but unproved matters, will be reviewed by M  lodie. Next, the Investigation Team or/and external experts designated by the Chair or the Board will analyze the report. This may include an investigation by legal counsel and/or accountants in some instances. All investigations will be kept confidential to the extent feasible. Appropriate corrective action will be taken, if necessary, and findings will be communicated to the reporting person and his or her supervisor.

Whistleblower Protection

- Pauwels Consulting will use its best efforts to protect whistleblowers against retaliation. Whistleblowing complaints will be handled with sensitivity, discretion, and confidentiality to the extent allowed by the circumstances and the law.

Generally, this means that whistleblower complaints will only be shared with those who have a need to know so that the investigation team of Pauwels Consulting can conduct an effective investigation, determine what action to take based on the results of any such investigation, and in appropriate cases, with law enforcement personnel.

- Employees, consultants and volunteers of Pauwels Consulting may not retaliate against a whistleblower for informing management about an activity which that person believes in good faith to be fraudulent or dishonest with the intent or effect of adversely affecting the terms or conditions of the whistleblower's employment, including but not limited to, threats of physical harm, loss of job, punitive work assignments, or impact on salary or fees. Whistleblowers who believe that they have been retaliated against may file a written complaint with the Chair. Any complaint of retaliation will be promptly investigated, and appropriate corrective measures taken if allegations of retaliation are substantiated. This protection from retaliation is not intended to prohibit supervisors from taking action, including disciplinary action, in the usual scope of their duties and based on valid performance-related factors.

- Whistleblowers must be cautious to avoid baseless allegations. Allegations that are baseless and not made in good faith may result in disciplinary action.

Accepted by the Board of Directors Pauwels Consulting on April 25, 2023.

PAUWELS MANAGEMENT BV

ACIES BV

EQUITY@WORK BV