

Nedap Whistleblower Policy

Where people work, things occasionally go wrong. It is inevitable and may in some cases even be a great learning opportunity. But in other cases, it can result in wrongdoing. Examples are situations where one or multiple employees breach the Nedap code of conduct, legislation or regulations, willingly misinform public authorities, or commit criminal offences or when there are indications that such wrongdoing is imminent.

The Board of Nedap therefore wants to have a policy in place that empowers current and former employees and others who are working for Nedap to report suspicions of wrongdoing internally at the company. When a suspicion is legitimate, this policy will enable Nedap to take timely and appropriate measures to put a stop to the wrongdoing and mitigate the harmful consequences for the company and possibly others as much as possible. Such a policy is in keeping with and helps sustain our open and transparent Nedap culture.

Whenever an employee suspects wrongdoing, the employee can raise their suspicion with their superior. If the employee in question does not feel comfortable doing so, the wrongdoing can also be reported to the Confidential Contact. The Confidential Contact is bound by a duty of confidentiality and will never disclose the whistleblower's name without their consent. The superior or Confidential Contact will, in turn, inform the Board of Directors of the suspicion of wrongdoing. The employee can also opt to raise their suspicion of wrongdoing directly with the Board of Directors.

If the employee thinks that the Board of Directors is somehow involved in the suspected wrongdoing, they can report the wrongdoing directly to the chairman of the Supervisory Board. The employee can also turn to the chairman of the Supervisory Board when the Board of Directors' investigation into the suspected wrongdoing has exceeded the 8-week time limit or if steps taken by the Board of Directors have failed to eliminate the wrongdoing and the Board has not taken additional steps or has failed to do so in good time.

To raise a suspicion of wrongdoing, the person in question does not have to provide facts to prove the wrongdoing. A suspicion based on reasonable grounds is enough to be able to report wrongdoing.

As soon as the Board of Directors has been informed of a suspicion of wrongdoing, they will immediately launch an investigation. The Board of Directors will report back to the person who raised the suspicion as soon as possible and at least within 8 weeks to let them know the outcome of the investigation and what steps have been taken.

The employee reporting a suspicion of wrongdoing and the person to whom this suspicion is reported shall treat the case in confidence. The identity of the whistleblower will not be revealed during the investigation. If there turn out to be compelling reasons not to keep the whistleblower's identity confidential, this will first be discussed with the whistleblower.

A whistleblower who raises a suspicion of wrongdoing in good faith will not be disadvantaged in any way as a direct consequence of having reported this wrongdoing and will be protected against adverse treatment by Nedap. If it turns out that the alleged wrongdoing was not reported in good faith (such as out of personal spite towards a fellow employee), this will constitute misconduct by the employee and will potentially provide grounds for disciplinary action.

Nedap's corporate culture is based on transparency and personal responsibility. Within such a culture, people have to be able to call each other to account and thus prevent wrongdoing, and therefore eliminate the need for whistleblowing. The whistleblower policy is therefore intended to ensure that in the event of any wrongdoing everyone knows what they can do to eliminate it.