

## **INTERNAL REPORTING REGULATION**

It is important that employees of Ballast Nedam, regardless of their position with the company, are able to report suspicions of misconduct or abuse at the company securely and effectively. There will be no repercussions for anyone filing a report as long as the report is submitted in accordance with this regulation.

### **1. Scope & purpose**

- 1.1 This internal reporting regulation governs the procedure for processing a report of a suspicion of misconduct or abuse.
- 1.2 A suspicion of misconduct or abuse means the following: suspected irregularities of a general or financial nature or relating to business operations. In other words, these are irregularities that may harm the reputation, integrity and business operations of Ballast Nedam. This may include fraud, violation of competition legislation, unacceptable ancillary activities, contact with unsavoury parties or leaking confidential business information. Reports of sexual harassment, personal complaints about one's job or conscientious objection to Ballast Nedam's business activities are not covered by this regulation. Employees should see their own supervisor, the Personnel Department or the Confidential Counsellor for these types of reports.
- 1.3 Reports may relate to current or past irregularities, or a future risk of misconduct or abuse.
- 1.4 This internal reporting regulation applies to all employees of Ballast Nedam, including temps and trainees (hereinafter referred to as 'employees').

### **2. Suspicion of inappropriate behaviour / fraud**

- 2.1 Employees who suspect an irregularity are expected to file a report.
- 2.2 Suspicions can be reported to the employee's supervisor, a member of the Personnel Department or to one of the three Compliance Officers (contact details are listed in Article 10 of this regulation).
- 2.3 If circumstances preclude any of these avenues, then the employee should use the SpeakUp Line.
- 2.4 This telephone number allows employees to report irregularities anonymously and directly to one of the Compliance Officers.
- 2.5 In an effort to keep false and/or unclear reports to a minimum, Ballast Nedam has decided that only anonymous reports that are submitted through the SpeakUp Line will be processed.
- 2.6 If a report involves a Compliance Officer, then the employee may approach the chairman of the Board of Management directly.

### **3. Report with malicious intent**

- 3.1 Ballast Nedam encourages its employees to report suspicions of misconduct or abuse in good faith. If an investigation is unable to confirm a suspicion or shows it to be unfounded, then no measures will be taken against the employee or employees who reported the irregularity in good faith.
- 3.2 Investigations are an expensive, time-consuming and potentially damaging process. Reports made out of malice and based on falsehoods will be treated as gross infringements of Ballast Nedam's internal rules and regulations. Ballast Nedam may take disciplinary action against employees who file malicious reports.

### **4. Anonymous reports**

- 4.1 Anonymous reports can be submitted by ringing the SpeakUp Line number. The hotline works with a voice response system: the employee files the report orally and the system issues a unique report ID number.
- 4.2 An anonymized transcript of the report is then prepared by a third party (a company not related to Ballast Nedam), which is then sent to one of the Ballast Nedam Compliance Officers. The recording is then immediately destroyed.
- 4.3 If the report involves one of the Compliance Officers, the report will be sent directly to the chairman of the Board of Management.
- 4.4 The Compliance Officer provides verification, if applicable, and additional questions designed to determine the authenticity of the report and to obtain further information. This response is then spoken into the system under the unique report ID number.
- 4.5 The employee rings again after a few days, enters the report ID number and hears the response and any additional questions from Ballast Nedam. The employee may respond immediately or at a later date.
- 4.6 The cycle may be repeated a number of times.
- 4.7 The employee may choose to disclose his or her identity to the Compliance Officer at any time. If the employee discloses his or her identity, the employee may then decide to continue communicating through the SpeakUp Line or switch to a different channel of communication.
- 4.8 Ballast Nedam guarantees the anonymity of employees by not attempting to trace the identity of those filing anonymous reports, unless malicious intent is suspected as referred to in Article 3.2.

### **5. Procedure**

- 5.1 When the Compliance Officer receives a report, either directly or through the SpeakUp Line, he or she will evaluate and assess it and decide on the course of action to follow. Generally speaking, this entails delegating the report to the person or department most capable of handling it. The Compliance Officer sees to it that all reports are investigated and processed, that they are documented properly and that a report is sent to the Board of Management.

5.2 Employees are required to cooperate with those investigating the report.

## **6. Report not investigated**

6.1 The Compliance Officer has the right not to initiate an investigation following receipt of a report. This is the case if:

- there is insufficient information available for an investigation and there is no possibility to gather additional information.
- it has been determined that the report was made with malicious intent.

## **7. Documentation**

7.1 The Compliance Officer submits a periodic report to the Secretary of the Supervisory Board. This document contains all current reports of irregularities, including those as referred to in Article 6.1 of this regulation, and is included in the Audit Committee's documentation.

## **8. Protection & rights of the employee**

8.1 Employees who file a report of a suspicion of abuse or misconduct in accordance with the provisions of this regulation and in good faith will not be adversely affected in their position in any way as a result of the filing of a report.

8.2 There are two exceptions which preclude this protection, even if the provisions of this regulation have been observed. These are:

- it has been determined that the report was made with malicious intent.
- the employee filing the report is involved in a serious offence or crime. In this case, Ballast Nedam will consider the fact that the employee filed a report him or herself when deciding on the measures to be taken as a result of the offence.

8.3 If the employee is dissatisfied with the conclusion or result of the report, or if he/she feels threatened or has been confronted with reprisals, then he/she may submit a complaint directly to the Compliance Officer, the chairman of the Board of Management or through the SpeakUp Line. If the report is made through the SpeakUp Line, the employee may request that the report be sent directly to the chairman of the Board of Management.

## **9. Data protection and privacy**

9.1 Ballast Nedam and the Compliance Officers shall treat all information they receive with the utmost confidence, unless revealing information in whole or in part is very important to the conduct of the investigation or the disciplinary measures to be taken. The employee's anonymity shall be guaranteed at all times in accordance with Article 4 of this regulation.

9.2 The internal reporting regulation is based on the processing of personal data. Rules and regulations on data protection therefore apply. Ballast Nedam observes the applicable rules.

## **10. Contact information**

- 10.1 The names and contact details of the Compliance Officers are available on Insite.
- 10.2 The SpeakUp Line can be reached by ringing 0800 - 0222931 and using access code 87062.