

## WHISTLEBLOWING POLICY

### I. What is whistleblowing and why is it important?

Here at EEG we believe in the importance of being honest, having integrity, and following the laws and regulations. Trust is very important to our organisation and we attach great importance to how we behave.

If you see something that doesn't seem right, something that concerns you, or something that seems to violate our rules, we would like you to report it. And we want you to be able to do this safely and without worrying about possible reprisals.

This policy explains how you can report **suspected misconduct** in confidence. It explains what you can expect from us after you have forwarded a report, and the action(s) we will take.

### II. Who can report an issue?

**Anyone** can express their views, and this includes both employees and external parties (including customers, suppliers, subcontractors, etc.). Our whistleblowing policy applies to anyone who wishes to raise a concern about possible misconduct within EEG.

We will then move the issue forward trusting that all the concerns reported have been raised in good faith. Any reporter who has not acted in good faith when reporting a suspected concern, or who fails to respect the confidentiality provisions in this policy, may lose the rights and protections described herein.

### III. How to report misconduct?

The reporter selects the desired/most appropriate channel from the list below:

- A. If you suspect misconduct, it is advisable to first discuss this with the **person involved** or – for our employees – to report this to your manager.
- B. EEG has established the following **reporting channel** for all locations: [meldpunt@eeg.be](mailto:meldpunt@eeg.be)  
The internal independent responsible person(s) responsible for receiving and following up will always ensure the identity of the reporter and any third parties mentioned are protected.
- C. We would prefer anyone wishing to report violations to use the internal reporting channel. But if the reporter feels this is unsuitable, he/she can also make direct use of an **external reporting channel** to report breaches to the relevant local authorities. A “Whistleblowing Authority” will be designated to act as an external reporting channel. This authority will be authorised to receive reports, provide feedback and follow up on reports. Currently the **federal ombudsman** is responsible for that external reporting channel. Anyone reporting breaches to an external reporting channel is also protected from retaliation. They are protected in the same way as anyone using the internal reporting channel.
- D. Employees can report the violations through disclosure.

#### **IV. What sort of reports are we talking about?**

Using **either the internal or external reporting channel**, violations can be reported in the following areas:

- Public contracts
- Financial services, products and markets, prevention of money laundering, and the financing of terrorism
- Product safety and product compliance
- Transportation safety
- Protection of the environment
- Radiation protection and nuclear safety
- Food and pet food safety, animal health and welfare
- Public health
- Consumer protection
- Protection of privacy and personal data, as well as security for network and information systems
- Combating tax fraud
- Combating social fraud
- The harm of EU financial interests or the EU internal market

#### **V. Submitting a report**

We recommend the reporter to provide as much relevant information as possible when submitting a report. Detailed information is required to be able to thoroughly assess the report, investigate it, and take appropriate action where necessary.

This comprises:

- A description of the situation that caused the concern, as well as the history of the misconduct and examples of the events.
- Names of persons who may be involved, dates, places, and other relevant information. People mentioned in the report will never be given access to the file.
- All supporting evidence and documents relating to the report.

A reported concern can only be followed up if it contains sufficient information and there is a reasonable opportunity to obtain more information where necessary. All reports are made confidentially. EEG always keeps the details of whistleblowing reports confidential both during and after the investigation, and this includes the identity of the whistleblower and anyone named in the report. We will only share the information with a limited number of people, and we will only disclose it outside this small group if we are legally required to do so or if the public interest is at stake. It is important for the reporter to also remain discreet and not discuss the submitted report with colleagues or others.

#### **VI. Prohibition of reprisals & privacy**



If you have filed a report in good faith, you will never be subject to (threats or attempts at) retaliation that causes or may cause you undue harm because of the report. EEG prohibits retaliation against employees or third parties who speak out in good faith or who cooperate with (an) investigation(s). Any form of threat or retaliation will not be tolerated and may result in disciplinary action.

EEG is committed to protecting the privacy of all data subjects. We will make every effort to protect personal data against unauthorised access and processing. Any personal data obtained in connection with this policy will only be used for the purposes explained in this document or to comply with the law or an important public interest.

Reports are stored securely and confidentially. All reports will be deleted and retained in accordance with our retention and deletion rules on a case-by-case basis.

## **VII. What happens after a report is made?**

We take every report of possible misconduct seriously. We investigate every case in accordance with our established standards to ensure the right quality and speed of response.

A. When an employee or external person makes a report, that person will receive a message that the report has been received within 7 days.

B. The report is recorded in a secure & confidential Excel file.

C. Every report is first assessed to see if further investigation is necessary. If it is deemed that further investigation is necessary, the case will be assigned to the appropriate internal expert within EEG. Sometimes external experts such as lawyers, accountants or auditors may also be called in to assist with the investigation. Techlink can also provide informal and confidential advice. All the information you provide will be treated with strictest confidentiality.

D. If the report has been made internally, the reporter will receive feedback from the person who receives and follows up on the report. If the report has been made externally, the federal ombudsman or local competent authority will take care of the follow-up.

E. Typically, it takes one to three months for a case to be completed. The reporter will then be informed of the outcome of the investigation and whether or not misconduct has been established. However, we will be unable to share all the details due to confidentiality, privacy and legal rights.