

Hittech Group whistleblower policy

1. Introduction

Hittech Group is committed to conducting its business with the highest standards of integrity, ethics and compliance. This whistleblower policy is designed to provide employees and stakeholders with a mechanism to report concerns or suspected violations of laws, regulations, policies or unethical conduct without fear of retaliation.

2. Scope

This policy applies to all employees, contractors, consultants, suppliers, vendors, customers and any other individuals or entities associated with Hittech Group.

3. Reporting channels

Employees in first instance are encouraged to report concerns or suspected violations to their direct supervisor/manager. Because we understand that that is not always the most easy or logical way, the following reporting channels are in place:

- Ethics hotline to one of the group's compliance officers:
 - René Janssen +31 (0) 6 5276 5509
 - Daniëlle Quarles van Ufford +31 (0) 6 2121 1155
- Designated whistleblowing email address:
 - whistleblower@hittech.com
 - klokkenluid@hittech.com

All reporting will be treated with the highest confidentiality.

4. Reporting obligations

4.1 Reporting Obligation

All employees and stakeholders have an obligation to report any concerns or suspected violations in good faith. False or malicious reports may result in disciplinary action.

4.2 Types of Reports

Reports may include, but are not limited, to the following:

- Fraud, theft or embezzlement



- Violations of laws or regulations
- Breach of company policies
- Unethical behavior
- Health and safety concerns
- Environmental concerns
- Conflicts of interest
- Discrimination or harassment
- Retaliation

5. Whistleblower Protection and Non-Retaliation

Hittech Group is committed to protecting whistleblowers from retaliation. No employee or stakeholder who reports a concern in good faith will be subjected to retaliation or adverse employment consequences. Retaliation against whistleblowers is strictly prohibited and may result in disciplinary action, up to and including termination.

6. Feedback, Investigation and Confidentiality

6.1 Feedback and Investigation

Upon receiving a report, the reporting person will receive an acknowledgement of receipt within seven working days of receipt of the report. Hittech Group will promptly and thoroughly investigate the matter in a fair and impartial manner. Investigations will be conducted by qualified personnel, who will maintain confidentiality to the extent possible. Within a period of up to three months after sending the acknowledgement of receipt, Hittech Group will provide the reporting person with information about the assessment and how the report has been or is being followed up upon (if that is the case).

6.2 Confidentiality

Hittech Group will treat all reports and the identity of the whistleblowers with utmost confidentiality, except where disclosure is required by law or necessary for investigation purposes. Whistleblowers are encouraged to provide sufficient information to allow for an effective investigation.

7. False Reports

Making a knowingly false report is strictly prohibited and may result in disciplinary action, up to and including termination.

8. Policy Review and Communication

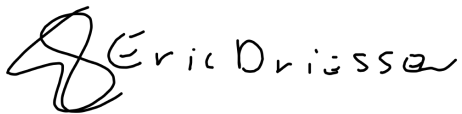
This policy will be periodically reviewed and (when necessary) updated, and will be communicated to all employees and stakeholders to ensure their awareness and understanding of the company's commitment to whistleblowing.

By implementing this whistleblower policy, Hittech Group aims to foster a culture of integrity, transparency and accountability.

Additional information concerning our code of conduct you can find on our website under:

https://hittech.com/wp-content/uploads/hittech_group_whistleblower_policy.pdf

Signature:

Handwritten signature of Eric Driessen in black ink.

Date: September 6, 2023, The Hague

Name: Eric Driessen

Function: CEO Hittech Group

