

# DARE TO SPEAK UP!

## Whistleblowing procedure

### CODE



At Vandemoortele Group (Vandemoortele NV and affiliated companies) we are committed to the highest standards of business integrity, compliance with legislation, as well as to provide a safe working environment for our associates and business partners. We have put guidelines and policies in place to ensure we live by these values in our day to day work, and have described these key values in our Code of Business Conduct & Ethics (**THE “CODE”**).

### PROCEDURE



With this whistleblowing procedure (**THE “PROCEDURE”**) we want to encourage you and provide guidance on how to report suspected wrongdoings in the workplace and in particular explain what ‘whistleblowing’ means, where you can get help, who can submit reports of suspected wrongdoings and the procedure for submitting such reports. It also explains how reports will be processed and followed up, as well as the guarantees that are in place with regard to confidentiality, protection against retaliation, and the respect of privacy and the protection of personal data.

This Procedure replaces the previous procedure on confidentially reporting incorrect behaviour that has been in place at Vandemoortele.



# **PRACTICAL GUIDE TO REPORT SUSPECTED WRONGDOINGS IN THE WORKPLACE**

**WHO CAN  
REPORT A  
MISCONDUCT?**



**WHAT CAN  
YOU REPORT?**



**WHERE TO GO  
FOR HELP?**



**HOW IS  
THE REPORT  
PROCESSED?**



**HOW AM I  
PROTECTED?**



**START  
REPORTING!**



**CONFIDENTIALITY**



**DATA PROTECTION & PRIVACY**



**MODIFICATIONS**



**WHISTLEBLOWING**



**COUNTRY SPECIFIC FEATURES**



**CONTACT**



# WHISTLEBLOWING

Is the practice whereby a person voluntarily reports misconduct (“**MISCONDUCT**”) in the workplace such as:

## CRIMINAL OFFENCES



click for  
example

### PRACTICAL EXAMPLE

You learn that Vandemoortele has paid a sum of money to a company in order to win a call for tender.

## BREACHES OF LEGAL OBLIGATIONS



click for  
example

### PRACTICAL EXAMPLE

Vandemoortele wants to create more margin on a product. You learn that in order to do so, Vandemoortele modifies the composition of the product (e.g. changing ingredients of a product without mentioning this on the label), with the result that it no longer meets the food safety and/or labelling requirements for consumption by consumers.

## INFRINGEMENTS OF CONTRACTUAL COMMITMENTS, THE COMPANY'S CODE, POLICIES AND PROCEDURES



click for  
example

### PRACTICAL EXAMPLE

You learn that Vandemoortele did not accurately record all of its funds, assets and transactions in its books and records.



# WHO CAN REPORT A MISCONDUCT?

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**REPORTS CAN BE SUBMITTED BY ANY PERSON** who acquired information on a Misconduct in a work-related context with Vandemoortele.



## MISCONDUCT

Timeframe

Reasonable ground

Out of scope

# WHAT CAN YOU REPORT?

This Procedure applies to the reporting of any Misconduct in the context of Vandemoortele's business operations.

Examples of Misconduct that can be reported under this Procedure are:



**(SUSPECTED) BREACHES OF  
THE CODE OF CONDUCT**



**BREACHES OF  
COMPETITION LAW**



**UNAUTHORIZED CONDUCT**



**(FINANCIAL) FRAUD**



**CRIMINAL OFFENCES**



**INFRINGEMENTS OF APPLICABLE  
LAWS AND REGULATIONS**





# WHAT CAN YOU REPORT?

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Misconduct

## TIMEFRAME

Reasonable ground

Out of scope

## REPORTS CAN RELATE TO



breaches that have  
already occurred



breaches which are  
imminent or anticipated



any attempts  
of breaches



# WHAT CAN YOU REPORT?

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Misconduct

Timeframe

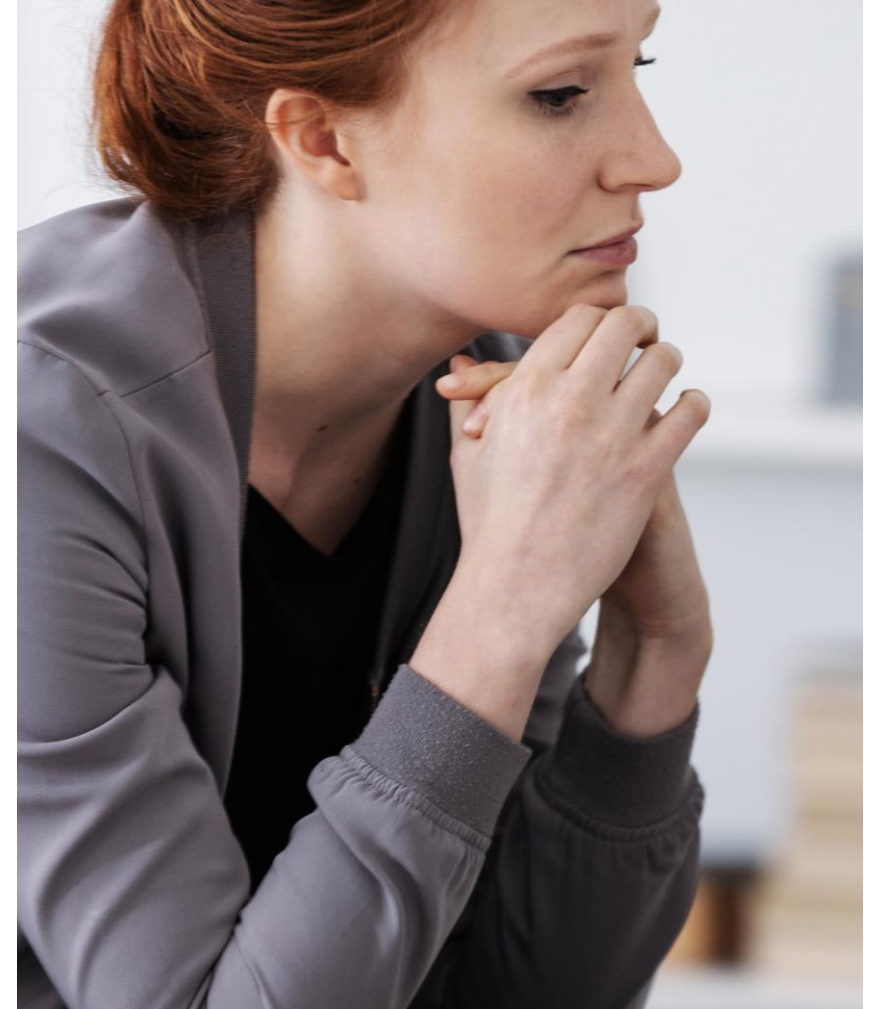
**REASONABLE GROUND**

Out of scope

Reports should always be made **IN GOOD FAITH**.  
Therefore, there must be at least a reasonable ground for making a report.

Upon submitting a report, you need to reasonably believe that the information and allegations about the alleged Misconduct are substantially true.

Therefore, in the event the Misconduct is not confirmed by the investigation, but there were indeed reasonable grounds for making a report, no further action will be taken.



# WHAT CAN YOU REPORT?

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Misconduct

Timeframe

Reasonable ground

**OUT OF SCOPE**

For the avoidance of doubt, this Procedure should in principle **NOT BE USED FOR PERSONAL WORK-RELATED CONCERNS** during the term of the employment contract such as concerns or dissatisfaction with wages, shifts or workplace circumstances, inter-personal issues, psychosocial risks (such as harassment, violence, etc.) or performance evaluations.

These kind of matters should in principle be reported through the **REGULAR INTERNAL CHANNELS**, e.g. by contacting your manager, the trust person or the HR department. If you are in doubt as to whether the disclosure you intend to make falls within the scope of this Procedure, please contact the HR department for guidance.

If you nevertheless report this through Speak Up, you will be **GUIDED TO THE RIGHT CONTACT PERSON**.





## FIRST LINE

Second line

Anonymity

Ways of reporting

External report

# WHERE TO GO FOR HELP?

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The normal way in which to report a Misconduct, is to inform your **DIRECT SUPERIOR** or other management representatives (where relevant) as listed in our **CODE**.



# WHERE TO GO FOR HELP?

First line

## SECOND LINE

Anonymity

Ways of reporting

External report

In circumstances

- where there would be no direct superior or other management representative (e.g. for persons whose work-based relationship is yet to begin), or;
- if you are of the opinion that the reporting of the Misconduct to your direct superior or any other resource listed in the Code is not suited or desirable,

Vandemoortele offers the possibility to report the Misconduct to the **CHIEF LEGAL & RISK OFFICER**, the **CHIEF HR & SUSTAINABILITY**, the **HEAD OF INTERNAL AUDIT** or via a web-based reporting system **SPEAK UP**.



**CONTACT  
DETAILS**



# WHERE TO GO FOR HELP?

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First line

Second line

**ANONYMITY**

Ways of reporting

External report

Vandemoortele guarantees the confidentiality of the notifications and the information it contains as well as, if applicable, your anonymity.



Please note however that if the report **INCLUDES YOUR NAME**, this will allow the investigating team to conduct the investigations **MORE EFFICIENTLY** and to put in place the requisite measures to effectively protect you.



First line

Second line

Anonymity

## WAYS OF REPORTING

External report

# WHERE TO GO FOR HELP?



In the event that you make an **ORAL REPORT**, Vandemoortele may document this report by making a recording of the conversation in the Speak Up platform, provided that you agree to such recording.

Alternatively, the case handler can write a transcript of the conversation which you can check, correct and agree to by signing it, after which it can be uploaded in the Speak Up tool.



When you **REPORT IN WRITING**, this may also be filed in the Speak Up platform (see **“REPORT FILED”**).

Case handlers will receive guidance, instructions and training on how and when reports should be uploaded in Speak Up.



You can request a **PHYSICAL MEETING** which shall be organised within a reasonable timeframe.

It is recommended to provide as much information as possible about the Misconduct with a clear description of the facts, the date of occurrence, persons involved and, if possible, to provide evidence thereof.



# WHERE TO GO FOR HELP?

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First line

Second line

Anonymity

Ways of reporting

**EXTERNAL REPORT**

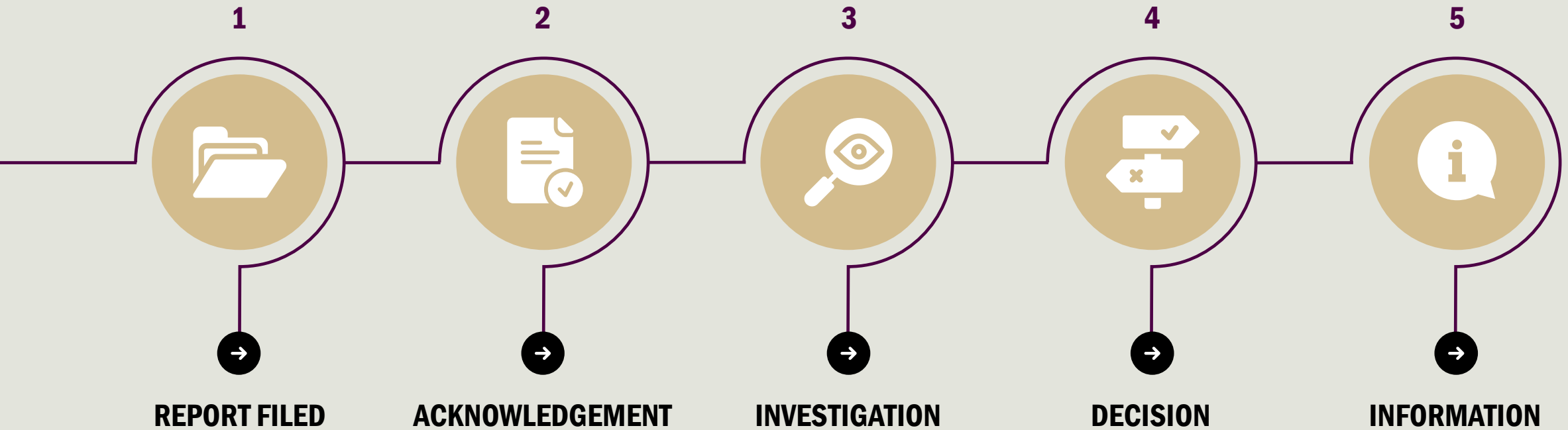
The use of internal reporting channels before reporting through external reporting channels is encouraged.

If you would have reasons to report externally, information regarding the procedures for reporting externally to competent authorities and, where relevant, to institutions, bodies, offices or agencies of the European Union, can be found in the section “**COUNTRY SPECIFIC FEATURES**”, if applicable.



# HOW IS THE REPORT PROCESSED?

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# HOW IS THE REPORT PROCESSED?

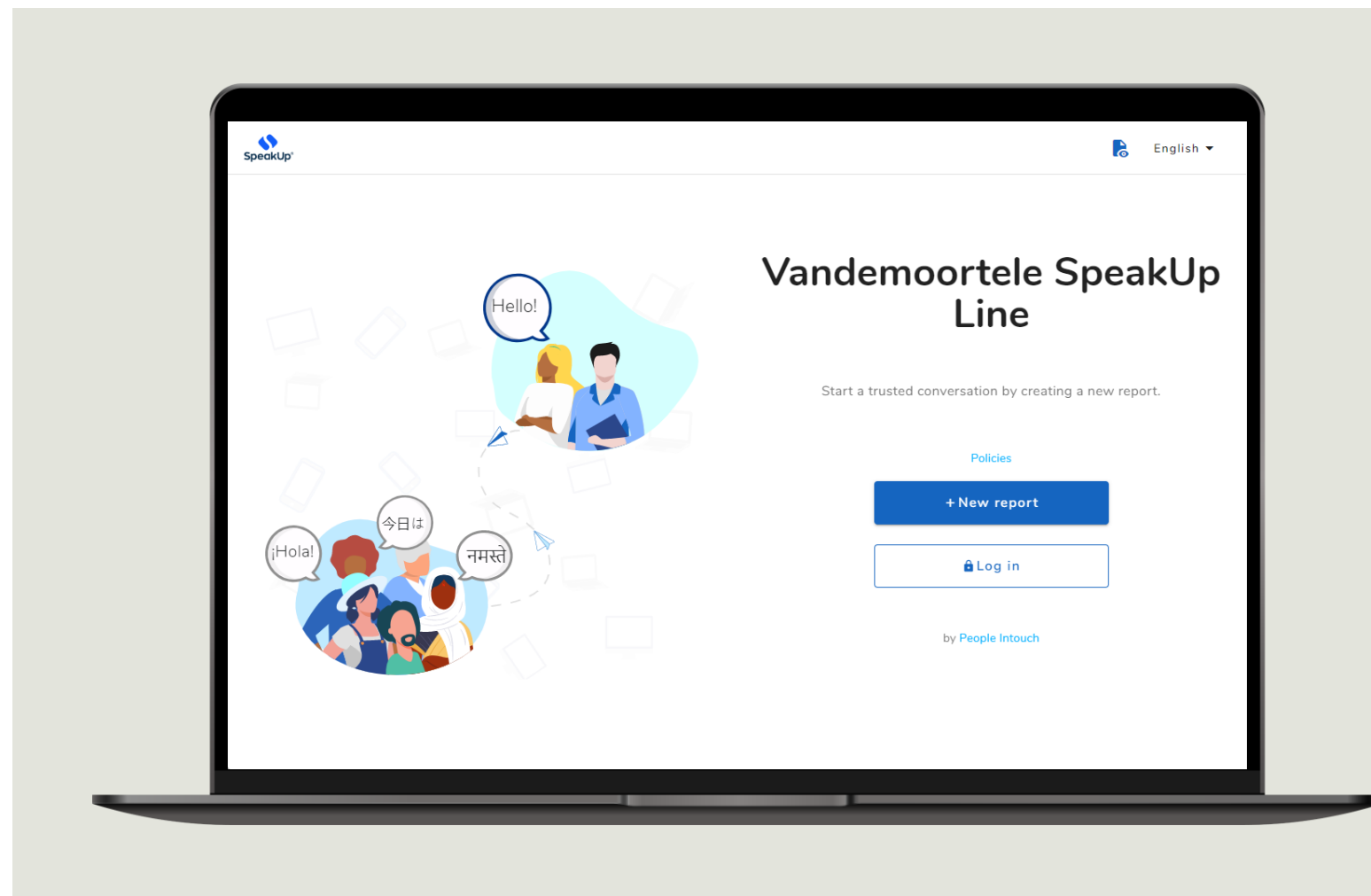


## 1. REPORT FILED

You can file a report in writing, orally (using the contact details as [here](#)) or going directly to the **SPEAK UP PLATFORM**.

When you report in writing or orally to a person, such person may file – together with you or on your behalf – a report in the Speak Up platform (either named or anonymously).

When you report via the Speak Up platform, your report will be initially sent to Philippe Delsaut (Chief Legal & Risk Officer), Marc Croonen (Chief HR & Sustainability) and Tomas Gevels (Head of Internal Audit), who will then **ASSESS** the type of complaint and **ALLOCATE** your case to a dedicated case handler to further investigate your report.



# HOW IS THE REPORT PROCESSED?



## 2. ACKNOWLEDGEMENT

You will receive an acknowledgement of receipt within 7 days of receipt of the report.

The case handler may request for **ADDITIONAL INFORMATION** required to conduct the investigation.





# HOW IS THE REPORT PROCESSED?



## 3. INVESTIGATION

### THOROUGH INVESTIGATION

Referral

No investigation

The case handler will promptly and discretely assess all notifications in accordance with this Procedure.

In the event the case handler deems the report to be validly made, it will conduct a thorough investigation in observance of the principles of confidentiality, impartiality and fairness towards all individuals involved.

The case handler may decide to involve other functions on a need-to-know basis in the context of the investigation.



# HOW IS THE REPORT PROCESSED?



## 3. INVESTIGATION

Thorough investigation

### REFERRAL

No investigation

The case handler will promptly and discretely assess all notifications in accordance with this Procedure.



The case handler could decide to refer you to a department or staff member within Vandemoortele for the handling of the report, when it is deemed better to handle the report via the normal hierarchical route or via another internal procedure.

This will however only be the case if the department / person referred to can follow-up on the report in an independent manner.

# HOW IS THE REPORT PROCESSED?



## 3. INVESTIGATION

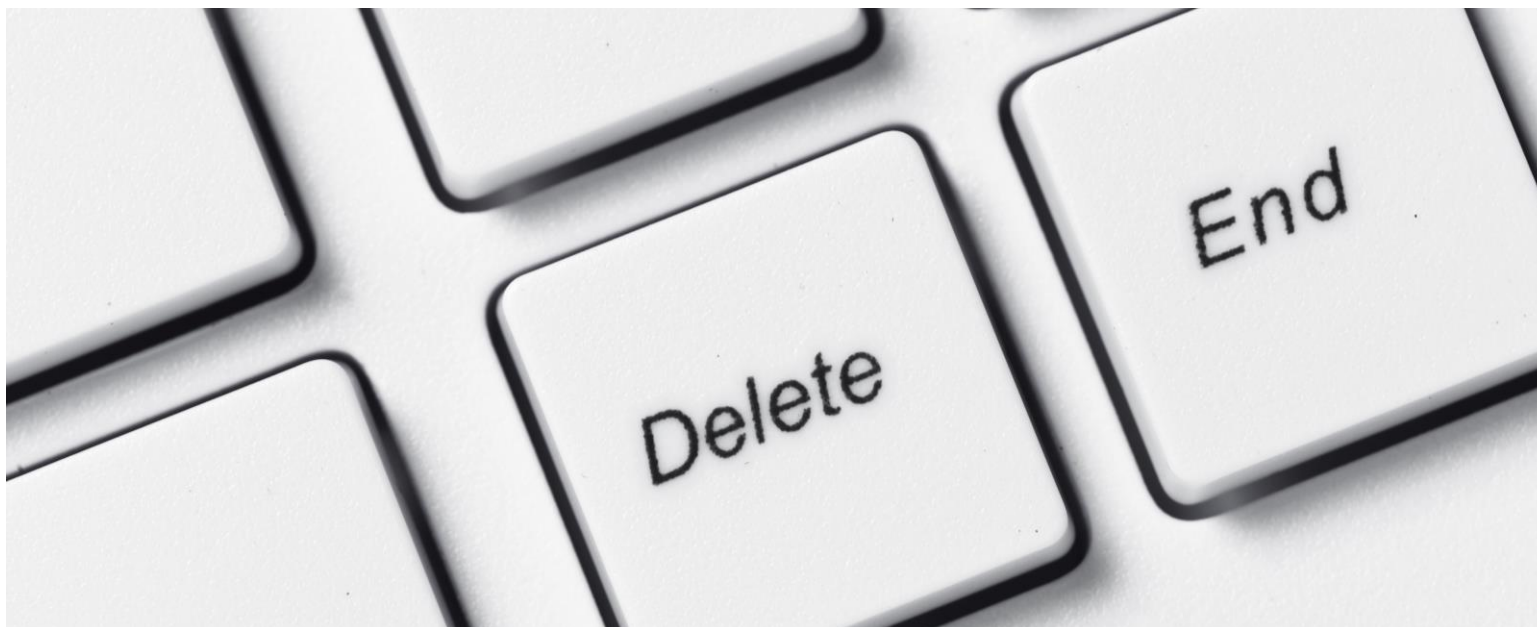
Thorough investigation

Referral

**NO INVESTIGATION**

The case handler will promptly and discretely assess all notifications in accordance with this Procedure.

In certain situations, the case handler may decide not to start an investigation. This could be the case for example when it can be reasonably determined that there is a (deliberate) false report, when there is not enough information for the investigation or when you do not (adequately) answer questions for additional information.



# HOW IS THE REPORT PROCESSED?



## 4. DECISION

After the investigation has been finalised, the case handler will draft a final report with a description of the facts and the final decision taken.

- In the event the Misconduct is **PROVEN**, relevant actions will be defined with a view to terminate the Misconduct and to protect the company; or
- In the event the investigations reveal that there is **INSUFFICIENT OR NO EVIDENCE** for the Misconduct, no further action will be taken.





# HOW IS THE REPORT PROCESSED?



## 5. INFORMATION

### FINAL CONCLUSION

Confidentiality

Amendment



The case handler will inform you of the final conclusion of the report and the decision taken.

Due to confidentiality obligations or governing privacy regulations, it may not be possible to inform you about all specific (investigative) measures taken. In any event you must treat all information you receive about the investigation and the measures taken with strict confidentiality.

This information must be given within a period of **3 MONTHS** from the acknowledgement of receipt.

Where available, the case handler will provide clear and accessible information regarding the procedure for reporting externally to any competent authority.

# HOW IS THE REPORT PROCESSED?



## 5. INFORMATION

Final conclusion

### CONFIDENTIALITY

Amendement

The case handler will keep a register of all reports that are submitted in Speak Up. The reports will be kept for the periods specified in **"Data protection and privacy"**.

In observance of full confidentiality in line with the section **"Confidentiality"**, the Chief Legal and Risk Officer as well as the Audit Committee of Vandemoortele will regularly be updated on the number of reports made in any given period, the nature and object of the report.



# HOW IS THE REPORT PROCESSED?



## 5. INFORMATION

Final conclusion

Confidentiality

**AMENDEMENT**

It might be decided to modify the procedure in such a way that the case handler will be assisted or replaced by one or more other person(s) with regard to receiving, processing and following-up reports. Should this be the case, this Procedure will be amended in accordance with "**Modifications**".



# HOW AM I PROTECTED?

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## RETALIATION

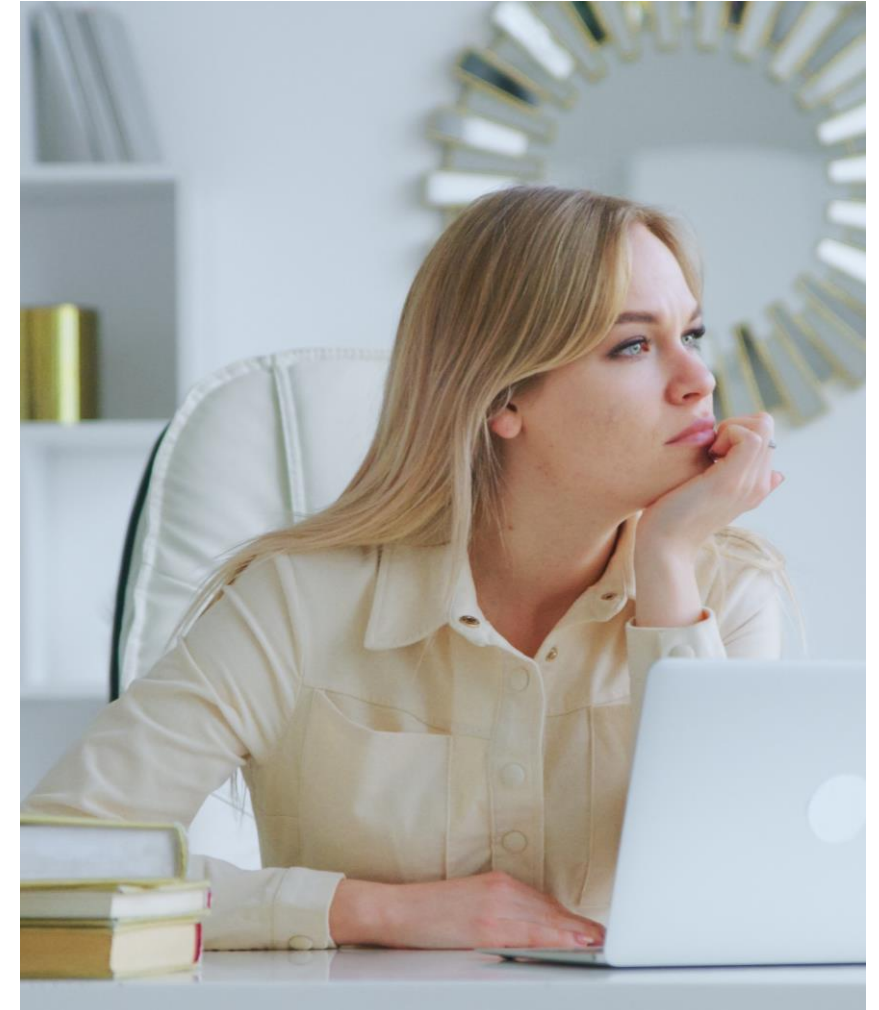
False allegations

Right of defence

Extended protection

If you have submitted a report in good faith, you will never be subject to any sort of (threats or attempts to) retaliation measure which causes or may cause unjustified detriment to you because of the report, such as (without limitation) suspension, lay-off, dismissal, demotion, withholding of promotion, transfer of duties, change of location, reduction in wages, a negative performance assessment, penalty, coercion, intimidation, harassment, discrimination, unfair treatment, harm reputation, blacklisting or any other form of retaliation.

Complaints of retaliation are taken very seriously. All such complaints will be reviewed promptly and, where appropriate, investigated. Please check "**Country specific features**" for any **COUNTRY-SPECIFIC REMEDIES** that might apply to your case.





# HOW AM I PROTECTED?

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Retaliation

## FALSE ALLEGATIONS

Right of defence

Extended protection

In the event that the investigation shows that you did not make the report in good faith (e.g., when the reporting contains false and unfounded allegations or is made for the sole purpose of defaming or causing prejudice to others), Vandemoortele may take appropriate **DISCIPLINARY AND/OR LEGAL MEASURES** against you.



# HOW AM I PROTECTED?

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Retaliation

False allegations

## RIGHT OF DEFENCE

Extended protection



Vandemoortele will inform the person suspected of having committed an irregularity or infringement as soon as possible of the existence of a report and of the facts alleged against him/her. The notification will be made within a reasonable period. The communication can be postponed in exceptional circumstances (e.g., when there is a risk of destroying evidence).

Please note that the person suspected of having committed a Misconduct fully enjoys the right to an effective remedy and to a fair trial, as well as

### **THE PRESUMPTION OF INNOCENCE.**

Vandemoortele shall at all times respect the rights of defence, including the right to be heard and the right to access the file against them (whilst protecting the rights of the persons making the report at the same time).

# HOW AM I PROTECTED?

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Retaliation

False allegations

Right of defence

**EXTENDED PROTECTION**

The measures for protection that Vandemoortele takes apply to you as well as those **PERSONS WHO COULD SUFFER RETALIATION** in a work-related context by aiding you, e.g. facilitators (works council confidant), third persons connected with you such as colleagues or relatives, and legal entities that you own, work for or otherwise are connected with.





# CONFIDENTIALITY

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## DISCRETION

Information



Vandemoortele treats all reports and communications related to a report with the utmost **DISCRETION**, regardless of whether you make a report anonymously. It is however important to remember that you, as reporting person, also have an obligation of confidentiality during the handling of your report.

# CONFIDENTIALITY

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Discretion

**INFORMATION**

The information received about a Misconduct, your identity or the identity of the person suspected of having committed an irregularity or infringement, will not be shared with anyone other than the authorized staff (other than the person responsible for the receipt of your report and the case handler(s)) competent to follow up on reports and the issues raised therein, unless you have given your prior explicit consent to share it with somebody else.

An exception will be made if legislation provides for mandatory disclosure to a national authority or disclosure to a judicial authority in the **CONTEXT OF AN INVESTIGATION**. In the event that such disclosure is necessary, you will be informed in advance, unless this information would jeopardise the related investigation or proceedings. Moreover, only the data strictly necessary for compliance will be shared in such a case.





# DATA PROTECTION & PRIVACY

Any processing of personal data by an entity of Vandemoortele following from a report of Misconduct in accordance with the Procedure, shall comply with the applicable regulations on the protection of personal data and is subject to the **PRIVACY NOTICE**.

SUMMARY



FULL DOCUMENT



# DATA PROTECTION & PRIVACY

## PRIVACY NOTICE: SUMMARY

**VANDEMOORTELE NV AND YOUR EMPLOYER ARE RESPONSIBLE AS DATA CONTROLLER** for the processing of personal data collected in the context of reports submitted. This may include the facts of the Misconduct, the date of occurrence, the personal identification data of the people involved (both the person(s) submitting the report and the person(s) concerned) and any possible evidence proving the Misconduct.

Personal data relating to reports that are considered unfounded will be deleted immediately after completion of the investigation. Personal data relating to reports of legitimate concerns will be deleted within a reasonable period of time after the investigation has been completed, but no later than after eight weeks, unless disciplinary action or legal proceedings are taken against the accused or the associate who made a report in bad faith. In this case, the data shall be deleted within a one year period after the disciplinary action or legal proceedings have been concluded and/or the deadline for appeals has expired.



**DATA SUBJECTS CAN EXERCISE THEIR RIGHTS UNDER THE GDPR** by sending an email to [privacy@vandemoortele.com](mailto:privacy@vandemoortele.com)



# MODIFICATIONS

This policy does not form part of any contract of employment or other contract to provide services and Vandemoortele is entitled to **MODIFY THIS PROCEDURE** from time to time in order to guarantee compliance with relevant legal obligations or in the event of changes to the internal process. The amended versions will be clearly communicated through the appropriate channels, indicating the date of modification.



# COUNTRY SPECIFIC FEATURES

## BELGIUM

### SCOPE

The Belgian Whistleblowing legislation has an extended scope of application compared to the EU Directive. Apart from the breaches included in the Directive, Belgian legislation also specifically covers reports regarding tax fraud and social fraud.

### EXTERNAL REPORTING

Further information on external reporting possibilities can be found [here](#).

## CZECH REPUBLIC

### SCOPE

The Czech Whistleblowing legislation has an extended scope of application compared to the EU Directive. It covers all reports about potential unlawful act which has the characteristics of a criminal offence and breaches the Czech Whistleblowers Act, or other Czech or EU law in the areas defined by the Czech Whistleblowers Act (including provision of financial services, consumer protection etc.).

### EXTERNAL REPORTING

Further information on external reporting possibilities can be found [here](#).

## FRANCE

### SCOPE

The French Whistleblowing legislation has an extended scope of application compared to the EU Directive, covering all reports regarding a crime, an offence, a threat or harm to the general interest, a violation or an attempt to conceal a violation of an international commitment duly ratified or approved by France, of a unilateral act of an international organization taken on the basis of such a commitment, of the law of the European Union, or of the law or regulation.

### EXTERNAL REPORTING

Further information on external reporting possibilities can be found [here](#).

# COUNTRY SPECIFIC FEATURES

## THE NETHERLANDS

### SCOPE

The Dutch legislation has an extended scope of application compared to the EU Directive. In addition to the breaches included in the Directive, Dutch legislation also covers reports regarding acts and omissions in which the public interest is at stake and which (i) currently constitute or have constituted a violation of legal provisions (including internal obligations established by employers on the basis of legal provisions) and/or (ii) currently endanger or have endangered public health, the safety of individuals, the environment or the proper functioning of government or the company.

### ADDITIONAL PROTECTION

Dutch legislation includes a possibility for whistleblowers to request the Whistleblowers Authority (Huis voor klokkenluiders) to conduct an investigation on how the whistleblower has been treated by the employer following the whistleblower's report.

### EXTERNAL REPORTING

Further information on external reporting possibilities can be found here:

- [Netherlands Authority for Consumers & Markets](#)
- [Dutch Authority for the Financial Markets](#)
- [Dutch Data Protection Authority](#)
- [Dutch Central Bank](#) (De Nederlandsche Bank)
- [Inspectorate for Health and Youth Care](#)
- [Dutch Healthcare Authority](#)
- [Authority for Nuclear Safety and Radiation Protection](#)

The [Dutch Whistleblowing Authority](#) has been designated as the competent authority to handle external reports if no other specific authority is competent or, if another authority is competent, such authority does not handle the report properly.





# QUESTIONS?

**Emma Ottoy**

**Legal Counsel**

**[emma.ottoy@vandemoortele.com](mailto:emma.ottoy@vandemoortele.com)**



# CONTACT DETAILS



## CHIEF LEGAL AND RISK OFFICER



- In writing (which may be done anonymously):  
To the attention of the Chief Legal and Risk Officer,  
**Philippe Delsaut**, Vandemoortele NV  
Ottergemsesteenweg Zuid 816 - 9000 Ghent, Belgium
- By e-mail (anonymity cannot be maintained towards  
the Chief Legal and Risk Officer)  
[philippe.delsaut@vandemoortele.com](mailto:philippe.delsaut@vandemoortele.com)

## CHIEF HR & SUSTAINABILITY

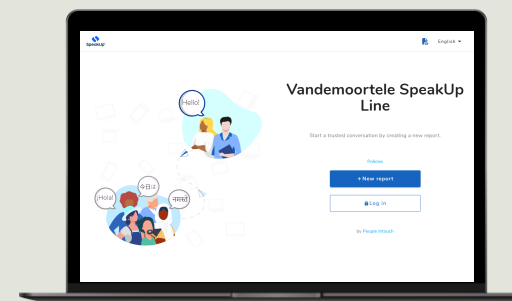


- In writing (which may be done anonymously):  
To the attention of the Chief HR & Sustainability,  
**Marc Croonen**, Vandemoortele NV  
Ottergemsesteenweg Zuid 816 - 9000 Ghent, Belgium
- By e-mail (anonymity cannot be maintained towards  
the Chief HR & Sustainability)  
[marc.croonen@vandemoortele.com](mailto:marc.croonen@vandemoortele.com)

## HEAD OF INTERNAL AUDIT



- In writing (which may be done anonymously):  
To the attention of the Head of Internal Audit,  
**Tomas Gevels**, Vandemoortele NV  
Ottergemsesteenweg Zuid 816 - 9000 Ghent, Belgium
- By e-mail (anonymity cannot be maintained towards  
the Head of Internal Audit)  
[tomas.gevels@vandemoortele.com](mailto:tomas.gevels@vandemoortele.com)



**File a report, online using  
our “SPEAK UP” tool,  
which may also be done  
anonymously.**

**TO THE PLATFORM**





## MISCONDUCT

**Breaches or suspected breaches  
of the code of conduct of Vandemoortele  
and other policies and procedures  
of the Vandemoortele group**

### PRACTICAL EXAMPLE

You learn that Vandemoortele did not accurately record all of its funds, assets and transactions in its books and records.



## MISCONDUCT



**Unauthorized conduct that  
is also prohibited by law such as,  
but not limited to, discrimination.**

## PRACTICAL EXAMPLE

You are a candidate for an open vacancy at Vandemoortele. You become aware that Vandemoortele has ended your selection procedure after learning that you are of different origin.





## MISCONDUCT

**Criminal offences,  
such as but not limited to,  
theft, bribery or corruption.**

### PRACTICAL EXAMPLE

You learn that Vandemoortele has paid a sum of money to a company in order to win a call for tender.



## MISCONDUCT



**Breaches of competition law, such as but not limited to, price-fixing agreements with competitors, the exchange of price-sensitive information with competitors.**

## PRACTICAL EXAMPLE

You become aware that an associate of Vandemoortele discusses prices with a former classmate who works for a competitor.



## MISCONDUCT



**(Financial) fraud, such as but not limited to,  
accounting manipulation, money laundering,  
misappropriation of company funds,  
non-compliance with internal audit procedures.**

## PRACTICAL EXAMPLE

You learn that a manager of Vandemoortele takes supplies of Vandemoortele for its personal use (e.g. for a personal bakery project).





## MISCONDUCT



**Infringements of applicable laws and regulations, such as but not limited to, protection of the environment, product safety and compliance, consumer protection, corporate taxation, protection of personal data and privacy, etc..**

## PRACTICAL EXAMPLE

Vandemoortele wants to create more margin on a product. You learn that in order to do so, Vandemoortele modifies the composition of the product (e.g. changing ingredients of a product without mentioning this on the label), with the result that it no longer meets the food safety and/or labelling requirements for consumption by consumers.



(version 11/10/2022)

# PRIVACY NOTICE

## DATA PROTECTION

Identity & contact details

Processing of personal data

Security of processing

Data protection rights

Updates

Vandemoortele is committed to ensuring that your privacy is protected. All personal data that we obtain following from a report of Misconduct in accordance with Vandemoortele Whistleblowing Procedure (the "Procedure"), is processed in accordance with applicable data protection legislation, in particular the General Data Protection Regulation 2016/679 of 27 April 2016 ("**GDPR**"), as well as this Privacy Notice.

This Privacy Notice provides more information about the personal data that we process, why we process it, how we obtain the data, how long we retain the data and with whom we share it.







# PRIVACY NOTICE

Data protection

## IDENTITY & CONTACT DETAILS

Processing of personal data

Security of processing

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Updates

The following legal entities qualify as joint data controllers for the processing of your personal data:

Vandemoortele NV and, in case you are an associate, the entity acting as your employer.



If you have **ANY QUESTIONS ABOUT THE PROCESSING OF YOUR PERSONAL DATA**, you can always contact us via e-mail: [privacy@vandemoortele.com](mailto:privacy@vandemoortele.com)





# PRIVACY NOTICE

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Data protection

Identity & contact details

**PROCESSING OF  
PERSONAL DATA**

Security of processing

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Updates



Below, you can find more information on **THE CATEGORIES OF PERSONAL DATA** that we process in the context of the whistleblowing reports and their follow-up, why we process such personal data, how we obtain the data, how long we retain the data and with whom we share it.

In accordance with our Procedure, we may process the facts of the Misconduct, the date of occurrence, the personal identification data of the people involved (both you and the person(s) concerned) and any possible evidence proving the Misconduct.

This data allows us to effectively follow-up on a report of Misconduct in accordance with the Procedure.



# PRIVACY NOTICE

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Data protection

Identity & contact details

**PROCESSING OF  
PERSONAL DATA**

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The legal basis for this processing is our legitimate interest following EU legislation on whistleblowing, to establish an **INTERNAL REPORTING CHANNEL** to report any concern about actual or suspected irregularities and infringements committed, in a confidential and, if desired, anonymous way and whilst remaining protected from retaliation (art. 6, §1, (f) GDPR).

We obtain the personal data from you of the Misconduct. Furthermore, following a report of Misconduct, further information (including personal data) can be obtained from **THIRD PARTIES** during the investigation in accordance with the Procedure.







# PRIVACY NOTICE

Data protection

Identity & contact details

**PROCESSING OF  
PERSONAL DATA**

Security of processing

Data protection rights

Updates



We delete any personal data relating to reports that are considered unfounded immediately **AFTER COMPLETION OF THE INVESTIGATION**. Personal data relating to reports of legitimate concerns will be deleted within a reasonable period of time after the investigation has been completed, but no later than after eight weeks, unless disciplinary action or legal proceedings are taken against the accused or the associate who made a report in bad faith. In this case, the data shall be deleted within a one year period after the disciplinary action or legal proceedings have been concluded and/or the deadline for appeals has expired.



Data protection

Identity & contact details

## PROCESSING OF PERSONAL DATA

Security of processing

Data protection rights

Updates

# PRIVACY NOTICE

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We only share the above mentioned personal data with **OUR EXTERNAL ADVISERS** such as lawyers and internal associates to the extent necessary to follow up on the report and the issues raised therein. Furthermore, pursuant to a disclosure required by law, we may also share the personal data with a competent national authority or a judicial authority in the context of an investigation. If the latter disclosure is necessary, you will be informed in advance, unless such information would jeopardise the investigation or proceedings.



# PRIVACY NOTICE

Data protection

Identity & contact details

Processing of personal data

**SECURITY OF PROCESSING**

Data protection rights

Updates



We are committed to ensuring that your personal data is secure. We have therefore implemented appropriate technical and organizational measures to ensure the **CONFIDENTIALITY OF YOUR PERSONAL DATA**. Namely, only the authorized recipients of a report have access to the report in the reporting tool. Furthermore, the case handler(s) shall treat the report in a confidential manner and in compliance with the applicable regulations on the protection of personal data. More specifically, the personal data obtained through a report and the subsequent investigation will only be used to investigate the report and, where necessary, to take action in response to the report received.

# PRIVACY NOTICE

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Data protection

Identity & contact details

Processing of personal data

## SECURITY OF PROCESSING

Data protection rights

Updates

Furthermore, we have implemented technical and organizational **MEASURES TO PROTECT YOUR DATA** from accidental and unlawful destruction, loss, alteration, unauthorized disclosure and access.

We have made the necessary contractual arrangements with the third parties with whom we work together and will not transfer your personal data outside the European Economic Area without ensuring that your data is granted an equivalent level of protection there.



# PRIVACY NOTICE

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You can always contact us to exercise the following rights:

1

The right to obtain more information about the balancing test that we have carried out in the context of our legitimate interest

4

The right to request restriction of the processing of your personal data

2

The right to request access or rectification of your personal data

5

The right to object to the processing of your data

3

The right to request erasure of your personal data

6

A complaint if you believe that we are not acting in accordance with applicable data protection laws. You can also submit a complaint to the belgian data protection authority.

Data protection

Identity & contact details

Processing of personal data

Security of processing

**DATA PROTECTION RIGHTS**

Updates



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It must be noted that this Procedure also serves an important objective of general public interest of the EU and of the Member States. The effective protection of the confidentiality of the identity of reporting persons is necessary for the protection of the rights and freedoms of others. Therefore, where necessary, the exercise of certain data protection rights of persons concerned can be restricted in line with Article 23 **GDPR** to the extent that, and as long as, it is necessary to prevent and address attempts to hinder reporting or to impede, frustrate or slow down follow-up, in particular investigations, or attempts to find out your identity.



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In line with the rationale of the Procedure, it must be noted that only in **EXCEPTIONAL CIRCUMSTANCES**, which will be strictly assessed, and subject to appropriate safeguards, it is only possible to disclose your identity a) where you have consented to such disclosure; or b) where that is a necessary and proportionate obligation under Union or national law in the context of investigations by authorities or judicial proceedings, in particular to safeguard the rights of defence of persons concerned. The protection of confidentiality does not apply where you have intentionally revealed his or her identity in the context of a public disclosure.

We respect all rights relating to your personal data to which you are entitled under applicable law and will therefore always adhere to your request as required by law.

For identification purposes, we may ask you for a copy of the front of your identity card. We ask you to remove the picture on your identity card.

You can reach us via e-mail:



**PRIVACY@VANDEMOORTELE.COM**







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**UPDATES**

This Privacy Notice may be amended from time to time, within the limits of the applicable data protection laws. Via our reporting tool you can always have **ACCESS TO THE MOST RECENT VERSION**.

