



Whistleblowing procedure

Disclaimer: This procedure aims to provide you with supporting information as per how your report will be handled, by whom, according to which principles and under which timeframe. This procedure is an extract of mateco group policy n°3 named “reporting & handling of compliance incidents”. Should you need more information pertaining to this policy, please contact mateco compliance representative at the following address: compliance@mateco.lu.

1. What is a compliance incident?

A compliance incident is an intentional or a negligent act, or an omission, constituting a violation of laws, government regulations, or internal mateco’s policies.

Such incident may take the form of a fraudulent act for instance, which is a compliance violation deliberately practiced (carrying out, tolerance, omission) by an employee or a third party to secure unfair or unlawful gain and which cause, or potentially cause, damage to mateco. It is of no relevance if the act constitutes a crime under applicable law.

A compliance incident may:

- Be a violation of laws and/or regulations, and / or standards for doing business (Human rights, environment);
- Be a breach of contractual obligations (e.g., to business partners);
- Result in a (potential) litigation;
- Harm the reputation of mateco (e.g., extensive negative press coverage);
- Have a negative operational impact to mateco;
- Result in the loss of a contract or exclusion from future contracts (blacklisting);
- Be a violation of mateco’s policies and procedures.

2. Reporting a compliance incident using the whistleblowing channel

As stated in its Code of Conduct, mateco fosters open communication and promotes the possibility to speak up freely, in trust and to raise good faith concern, without fear of retaliation, notwithstanding the channel of communication.

Whistleblowing is a procedure that enables mateco employees (or any other external stakeholders) to alert mateco compliance responsible about serious and legitimate concerns regarding internal governance irregularities, malfunctions or wrongful, unethical, inappropriate, or unlawful behaviour and misconduct within or outside mateco, which they deem detrimental to its business activities.

If, for example, individuals wish to report a situation that they feel is contrary to mateco's standards and cannot find a trustworthy (in their judgement) contact to receive this information, they can choose to connect to mateco's platform dedicated for all users, accessible by logging on to an application or clicking on a web link available to them (the "Whistleblowers").

3. Practicalities

The Whistleblowers may choose to identify themselves by their surname and/or first name, their address, title, or they may decide to remain anonymous and to be represented by a number made up of several randomly assigned digits for instance.

In both ways, the mateco compliance responsible designated to respond to these alerts must be able to interact with the Whistleblowers, including when they are anonymous, and to subsequently determine the steps to be taken to resolve the issue at stake.

At all times, anonymity of the Whistleblowers must be ensured. Depending on the information provided, it may be possible to guess the identity of the Whistleblowers, with a limited degree of certainty. This anonymity can, however, only be lifted at the Whistleblower's discretion, particularly for investigative purposes.

Once an alert has been received, the mateco compliance responsible must acknowledge receipt within one week as a maximum. A more detailed answer may require further time, especially if an investigation is necessary.

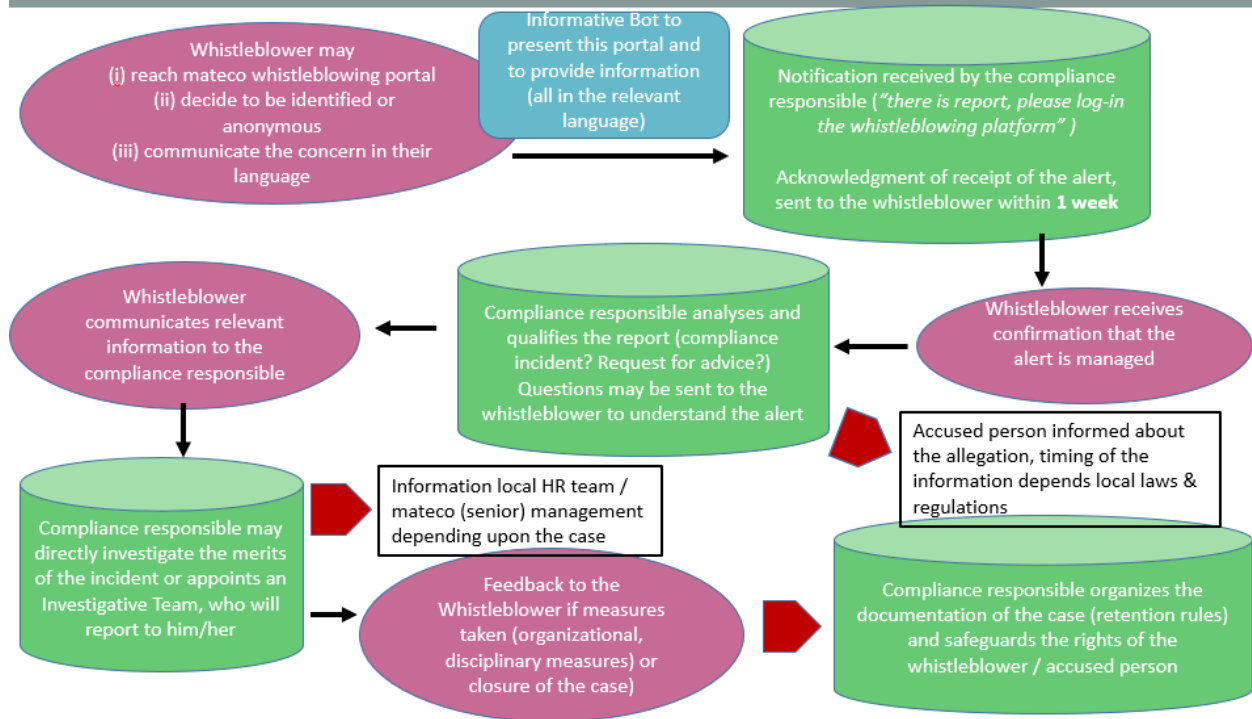
Regular updates should therefore be communicated to the Whistleblowers, all along the processing of the alert and/or during the time the investigations are being performed.

The mateco compliance responsible must always ensure that the rights of the Whistleblowers and the rights of the accused persons are safeguarded, in accordance with applicable laws and regulations, in particular Labor laws. Work council representative and/or lawyer may be involved in the process.

In certain jurisdictions, the accused persons must be informed of the allegations against them and give the chance to make a personal statement as early as possible and/or to respond to the allegations, if this does not compromise the investigation.

4. Whistleblowing alert management - Organizational flowchart

Organizational flowchart – Whistleblowing



Luxembourg, 05 January 2024 (Last update)