
Speak Up & Reporting Policy

Purpose

AMG has adopted this Speak Up & Reporting Policy to encourage all its employees and stakeholders to speak up and to report any Suspected Irregularities, as defined below. Furthermore, this Policy explains how everyone can raise concerns about suspected misconduct in confidence and without fear of retaliation. It also describes what everyone can expect from AMG when speaking up. Employees involved are entitled to protection from retaliation for having, in good faith, made a complaint by filing a report, disclosed information relating to a report or otherwise participated in an investigation relating to a report filed. The Speak Up procedure will enable AMG to investigate business conduct incidents, including incidents of corruption and bribery, promptly, independently and objectively.

Scope and Applicability

This Policy is applicable to AMG and all its business units. It is designed for all employees, our stakeholders or any third party doing business with AMG.

As AMG operates in various countries and regions, local laws will differ. AMG is committed to complying with all relevant European and national laws, including national whistleblowing legislation applicable to AMG subsidiaries based in the EU and elsewhere. Where the requirements of local legislation deviate from this policy and apply stricter or additional rules, these stricter or additional rules shall prevail or apply.

A Reporter based in one of the EU subsidiaries has the right to either speak up by following the procedure in this Policy or to directly launch a Speak Up report following the local national AMG Speak Up Policy. For further details, reference is also made to local national procedures governing the respective whistleblowing processes.

Reporters are encouraged to report their concerns internally. However, Reporters may also report their concerns externally in accordance with local legislation. External reporting of Suspected Irregularities can have serious impact for AMG and for any persons involved. This may also include the Reporter. Given the severe consequences of external reporting, Reporters are strongly encouraged to seek advice first e.g. from the local or Chief Compliance Officer. If an external report is to be made, it should be made to a competent regulator and in an appropriate manner taking into consideration the legitimate interest of all involved.

Roles and Responsibilities

- The Management Board has adopted this Policy and is responsible for its implementation.
- The Management Board shall review this Policy and its implementation regularly in consultation with the Supervisory Board.

- The Chief Compliance Officer reports to the Chairman of the Management Board and has been authorized to properly implement this Policy, training on this Policy and the Speak Up procedure and handling - together with local Compliance Officers - of Reports made following the Speak Up procedure.
- The local Compliance Officers are responsible for creating local awareness of the Policy, for handling of local Reports made and for coordinating the Speak Up procedure with the Chief Compliance Officer.
- Managers are responsible for creating an open culture where people can speak up. Managers are expected to be aware of the Speak Up procedure and this Policy.
- All AMG employees are expected to speak up when observing any Suspected Irregularities.

Key Definitions

- **Chief Compliance Officer:** the person designated by the Management Board to act in that capacity for the Company and its group companies and to whom responsibility has been delegated for proper implementation of this Policy.
- **Compliance Officer(s):** the person(s) designated by the management of the designated local group companies together with the Chief Compliance Officer to act in that capacity for such group companies.
- **Code:** the AMG Code of Business Conduct as amended from time to time and approved by the Management Board.
- **Reporter:** a person who has observed or experienced a Suspected Irregularity and has reported this in accordance with this Policy.
- **Suspected Irregularity:** a suspicion based on reasonable grounds regarding the compliance with the Code, AMG policies or the law by the Company and/or any of its group companies and/or any of its Employees or any of its joint venture partners, consultants, contractors, suppliers, agents and customers.
- **Third party:** anyone other than the Reporter making the Report, the person(s) to whom the Reporter has submitted a Report and the person(s) investigating the Report.

AMG's Commitment regarding Speak Up & Resporing

At AMG, we are committed to conducting business with integrity and fairness, with respect for the law and our Values. We all share a responsibility to ask questions and raise concerns when we have a question about the AMG Values, our policies, the law or the AMG Code of Business Conduct ("Code") or think that any of these may have been violated. If you observe conduct that concerns you, you are encouraged to Speak Up.

Our Code cannot describe every possible situation that you might encounter in your daily work. If you cannot find the answer in our Code or have questions on how to interpret our Code, seek guidance. We need to have the courage to speak up and always strive to do the right thing.

At AMG, we value the help of anybody who speaks up about potential concerns that need to be addressed. Speaking up is encouraged and any Reporter who speaks up is protected. After all: speaking up is essential for AMG to sustain its reputation, success and ability to operate, both now and in the future. Reporters are entitled to protection from retaliation for having, in good faith, made a complaint by filing a report, disclosed information relating to a report or otherwise participated in an investigation relating to a report filed.

Who can report

Our Speak Up channels are available to internal and external stakeholders, such as all AMG directors, managers, former and current employees, joint venture partners, consultants, contractors, suppliers, and agents as well as customers and other stakeholders. Any person who has observed or experienced a Suspected Irregularity is encouraged to report in accordance with this Policy.

When to report

If you become aware of any Suspected Irregularity, we encourage you to report it without delay so it can be addressed.

Where to file a report

AMG is committed to consistently look into all reports, concerns or questions that are raised and to deal with them fairly, responsibly and in a timely manner. The Chief Compliance Officer and Compliance Officers of the respective group companies are responsible for handling Speak Up reports as indicated in the Speak Up procedure.

If you notice any potential Suspected Irregularity, you are encouraged to address this directly with the person involved or the relevant managers or supervisors at the relevant office or industrial site since they are usually best equipped to resolve concerns quickly and effectively. You can also reach out to AMG's local Compliance Officer or representatives nominated at our sites and industrial bases to receive concerns.

If this would not be appropriate, you may raise any questions or concerns by using any of the following channels, by filing a Report with:

- AMG's local Compliance Officer;
- AMG's Chief Compliance Officer (compliance@amg-nv.com) or via phone at +31 (0) 20 714 7141;
- an independent Speak Up Portal managed outside AMG. This Portal can be accessed online at <https://amgnv.speakup.report/raiseaconcern>, or you can scan the QR code below.

You can also download the Speak Up application in the Google Play Store (for Android)



and in the Appstore (for iPhone) by searching for 'Speak Up by People Intouch'.

Protection from retaliation

Any form of threat or retaliation against the Reporter will not be tolerated. Retaliation against Reporters is treated as a violation of our Code and consequently may lead to disciplinary measures. A report on retaliation against a Reporter is treated like any other Speak Up report and the same procedure is followed. Abuse of this Policy, e.g. raising a concern that you know is false, will not be acceptable.

The measures that AMG has taken to protect Reporters are:

- the option to report on an anonymous basis;
- reporting to an independent external Speak Up channel as set out above;
- AMG's non-retaliation commitment;
- cultivating a work environment where people feel safe to report internal issues.

Speak Up procedure

Filing the report

A Report may be submitted in writing or verbally and should include adequate details to explain the Suspected Irregularity. As per paragraph 5.3, a Report may be filed anonymously through the independent Speak Up portal, safeguarding the anonymity of the Reporter, or otherwise through the local or Chief Compliance Officer.

In the event a Report is made through the Speak Up portal, the Report is loaded onto the external system. The system notifies the local Compliance Officer or Chief Compliance Officer, depending upon the nature of the Report, taking all aspects into consideration. In the event a Report is made via email or telephone, the relevant local or Chief Compliance Officer uploads the Report into the portal.

Once submitted, it will be considered a formal Report and the following procedure applies. Any further correspondence regarding a Report is conducted through the Speak Up portal.

Handling the report

The local Compliance Officer or Chief Compliance Officer (as relevant);

- reviews the Report for the adequacy of detail and, in case of lacking details, collects the details from the Reporter;
- informs the Reporter as soon as practicable, but in any event within seven days, that the Report has been received;
- initiates an investigation into the reported Suspected Irregularity.

Information on the Report and the identity of the Reporter are kept confidential as further set out in paragraph 5.6.

In the event a Report is submitted to the local Compliance Officer, he or she shall promptly inform the Chief Compliance Officer about the filed Report and the reporting date.

Investigation

The investigation is conducted promptly and in an independent and impartial manner. The local or Chief Compliance Officer informs any persons implicated by a Report, without identifying the Reporter, under confidentiality, as further set out in paragraph 5.6.

After the investigation is concluded, the local Compliance Officer shall promptly inform the Chief Compliance Officer of the result of such investigation.

Follow up

Within three months upon receiving the Report, the local or Chief Compliance Officer (as relevant) follows up and provides a written statement about the Report, its merits, and whether the complaints identified in the Report require any substantiation or follow-up actions. A summary of this follow-up shall be provided to the Reporter within three months of the initial Report, by the local or Chief Compliance Officer (as relevant).

If no position can be given after three months, the local or Chief Compliance Officer (as relevant) shall notify the Reporter and provide an indication as to when a position can be expected.

Special situations

In case where reports involves a board member or compliance officer the following applies.

All Suspected Irregularities involving any member of the Management Board or Supervisory Board, shall be reported directly to the Chief Compliance Officer or through the Speak Up portal. Should a Report be filed with the local Compliance Officer, he/she shall direct such Report straight to the Chief Compliance Officer. The Chief Compliance Officer informs the Chairman of the respective board about the report and the reporting date, maintaining confidentiality as set out under paragraph 5.6.

All Suspected Irregularities involving any local Compliance Officer, shall be reported directly to the Chief Compliance Officer, or in case the irregularity concerns the Chief Compliance Officer, to the Chairman of the Management Board, who shall ensure that appropriate action is taken in line with the procedures set out in this Policy.

Confidentiality and anonymity

No information in relation to the identity of the Reporter, information that might allow the Reporter making the Report to be identified, the content of the Report or the Suspected Irregularity shall be provided to any Third Parties in or outside the AMG Group.

As a general rule, AMG is obliged to inform the implicated person(s) that a Report has been filed against him/her, without disclosing - as set out above - the identity of the Reporter.

AMG will make every effort to keep the identity and Reports of a Reporter confidential unless:

- the Reporter who has made a Report consents to disclosure of their identity and/or Report;
- disclosure is necessary for compliance with a legal obligation to which any AMG Group company is subject;
- disclosure is required for AMG or its group companies to efficiently investigate the Report and take any related steps - including but not limited to - remediation or imposition of sanctions;
- mandatory disclosure to law enforcement agencies is required or done by AMG when cooperating with law enforcement agencies.

No person within AMG shall request confidential information or otherwise seek to uncover confidential information, such as the contents of Reports and the identity of a Reporter, regardless of the Third Party's seniority or any senior management or board position within AMG.

Training

The Speak Up procedure is also set out in the Code. AMG provides training to its employees on the Speak Up procedure through training of its Code in the following manner:

- All new employees take the AMG Code of Business Conduct online training course.
- All new employees are inducted by the local Compliance Officer once they start employment and advised about the application of both the Code and this Speak Up Policy.
- AMG employees are trained regularly in the Code, either online or by way of onsite meetings.
- Compliance officers are trained about handling Reports received on a regular basis.

The Speak Up & Reporting Policy can also be found on the website of AMG.

Monitoring and Grievances

AMG ensures adequate record-keeping of all Reports and any identified actions, that every Report is retrievable and information received through Reports can be used as evidence in enforcement actions where appropriate. In addition, follow up actions shall be monitored.

All employees are expected to comply with this Policy. If any employee is found to have exhibited any inappropriate conduct or behavior in breach of this Policy, AMG reserves the right to take actions, including disciplinary action or dismissal.

Other related Documents

Other AMG policies and AMG documents that are related to the topic of this Policy are, amongst others:

- AMG Business Code of Conduct
- Supplier Code of Conduct.
