

## Whistleblower Policy for the Waterise Group

*resolved by the Supervisory Board of Waterise B.V. on 5 June 2025*

### 1. INTRODUCTION

- 1.1 This Whistleblower Policy has been resolved by the Supervisory Board of Waterise B.V., the parent of the Waterise Group, and the Chief Executive Officer (the “**CEO**”) is responsible for the implementation, training and assessment thereof.
- 1.2 Waterise has established a designated Whistleblowing Committee to ensure the proper handling of notifications pursuant to this policy and to give guidance to anyone who wants to report or managers who receive a notification. The Whistleblowing Committee consists of the Chief Financial Officer (“**CFO**”) and the Legal Counsel.
- 1.3 This Whistleblower Policy will be subject to regular review by the Supervisory Board of Waterise B.V.

### 2. WHY NOTIFY?

- 2.1 An open and respectful working environment is crucial for Waterise’s development and success and, as part of this, Waterise acknowledges its employees’ and representatives’ right to report concerns without fear of retaliation or any other negative consequences. When managers and the Whistleblowing Committee are made aware of concerns at an early stage, they are better placed to take action and improve the situation.
- 2.2 This Whistleblower Policy provides guidance on how, what and when to report, in addition to information about how the notifications are handled. There is also an overview of the rights and obligations of the parties involved, including principles for the processing of notifications.

### 3. WHO CAN NOTIFY?

All employees, interns, consultants and workers (including hired-in personnel) of the Waterise Group have a right to report their concerns. This right also extends to external stakeholders.

### 4. WHAT CAN BE NOTIFIED?

- 4.1 If you discover, or have reason to suspect, breaches of applicable laws and regulations or criminal offenses that may endanger anyone’s life or health, you have a duty to notify. Further, anyone may notify Waterise of any censurable condition in the Group; censurable conditions are breaches of applicable laws, regulations, Waterise’s Code of Conduct or any other related policies and ethical guidelines, including but not limited to, the Anti-Bribery and Corruption Policy, or any ethical norms which are acknowledged by society as a whole. These include, but are not limited to:
  - (i) danger to life or health;
  - (ii) danger to the climate or the environment;
  - (iii) corruption, fraud or other financial misconduct;
  - (iv) abuse of authority;
  - (v) an unsafe or unhealthy working environment;
  - (vi) harassment, bullying or discrimination; and

(vii) breach of personal data security.

- 4.2 If you are in doubt as to whether a situation, practice or similar is censurable condition, do not hesitate to contact your line manager or the Whistleblower Committee.

## **5. TRUE FACTS REPORTED IN GOOD FAITH**

When reporting a concern, you should have reasonable grounds to believe that the reported information about the infringement is true, and the notification should be made in good faith.

## **6. WHAT IS NOT A WHISTLEBLOWING MATTER?**

This Whistleblower Policy should not be used to report, or otherwise handle, concerns that do not fall under Section 4 above such as, job applications, commercial queries or disputed, ordinary human resources matters (for example, your employment conditions, salary, performance reviews or annual leave), personal grievance or general queries. Such issues should be submitted to the relevant function within Waterise and should be discussed with your line manager or the CFO.

## **7. HOW TO NOTIFY?**

- 7.1 To the extent possible, notifications should be made at the lowest possible level, typically directly to your line manager.
- 7.2 If reporting to your line manager is not a satisfactory option – for example, because your concern relates to him / her, the Whistleblowing Committee is always available. A concern relating to a member of the Whistleblowing Committee may be reported to the CEO and a concern relating to the CEO may be reported to a member of the Supervisory Board.
- 7.3 Concerns may be reported in writing, electronically or orally via telephone or a personal meeting. If you wish to report in person, a meeting shall be scheduled within seven days from the date a request for such meeting was submitted. Notifications should adequately describe the discovered or suspected behaviour, and the persons involved. If possible, it is helpful if the notification includes proof or documentation that supports the facts therein.

## **8. HANDLING OF NOTIFICATIONS**

- 8.1 Notifications will be promptly and thoroughly assessed; a line manager who receives a notification should immediately contact the Whistleblowing Committee.
- 8.2 In all circumstances, you will receive a confirmation that your notification has been received.
- 8.3 If the concern is reported directly to your line manager, the Whistleblowing Committee will conduct an initial assessment of the matter. In either circumstance, you will receive feedback on further case-handling.
- 8.4 If the notification relates to human resources matters (for example, the work environment or harassment), further case-handling will be delegated to human resources.
- 8.5 To the extent permitted by applicable privacy regulations, you will be informed of the outcome of the notification, and, in any case, you are entitled to feedback within three months; exceeding this deadline is only permissible if the investigations / measures for the appropriate follow-up actions are ongoing.

## **9. WHO WILL BE INFORMED?**

- 9.1 The Whistleblowing Committee will share information about the notification with the person or function who has the responsibility of reviewing and handling the case going forward.

- 9.2 A case will never be reviewed or investigated by anyone involved in the case, and it will always be reviewed or investigated by those in higher positions than the parties referred to in the notification. Cases involving executive management or the Supervisory Board will undergo external review.
- 9.3 If you have reported a concern about a particular person, he / she will be informed about the content of the notification as soon as possible, unless and to the extent that this can be expected to seriously hinder the assessment or follow-up of the case. If required, Waterise may report the matter to the relevant public authorities.

## **10. HOW ARE YOU PROTECTED?**

- 10.1 All notifications will be handled confidentially. If you decide not to make an anonymous notification, your identity will only be disclosed to those for whom disclosure is strictly necessary to process the notification. If the notification concerns a person (for example, a colleague), you can request that your identity is not disclosed to that person. If it is not possible to preserve confidentiality, you will be notified before a disclosure is made. In any case, Waterise will not tolerate retaliation of any kind.
- 10.2 If you experience a punishment or unfair treatment after having reported a concern, please inform your line manager.
- 10.3 Waterise will treat confidential all information and data received, fathered, retained or registered in connection with a notification and in accordance relevant data protection laws and other relevant legislation.