

Whistleblower Policy of Fyber N.V.

Dear employee,

As you know Fyber N.V. (the **Company**) encourages an open door policy in all parts of our organization and especially in the relation with our employees. In that respect the management of the Company encourages you to come forward with credible information, if you reasonably believe that there is a violation of applicable laws or policies within our business or the Company, and such violation needs to be addressed and handled to avoid damage to our Company, our employees or our reputation. Giving such information is better known as “whistleblowing”.

The management holds itself and all stakeholders accountable to high ethical standards within the applicable legal and corporate governance framework. We sincerely encourage you to help us in maintaining such culture!

What is a whistleblower?

A **Whistleblower** as defined by this policy is an employee of one of Fyber’s group companies who reports an activity that he/she considers to be illegal, in breach of Company policy or dishonest. Examples on what is considered as whistleblowing are given below.

The Whistleblower is not responsible for investigating the activity or for determining fault or corrective measures; appropriate management officials are charged with these responsibilities.

As a Whistleblower you are not treated unfairly or lose your job because you ‘blow the whistle’.

Complaints that count as whistleblowing

You can raise your concern at any time about an incident that happened in the past, is happening now, or you believe will happen in the near future. Whistleblowing concludes but is not limited to report any of the following:

- a criminal offence, e.g. fraud, insider trading;
- wrongful billing, e.g. for services not performed or for goods not delivered;
- fraudulent financial reporting;
- someone’s health and safety is in danger;
- discrimination of employees;
- risk or actual damage to the environment;
- a miscarriage of justice;
- the Company is breaking the law, e.g. it doesn’t have the right insurance;
- you believe someone is covering up wrongdoing;
- or similar circumstances.

Protection of Whistleblowers

The anonymity of the identity of all complainants who follow our electronic **Whistleblower Reporting Form** (see below) will be protected. Whistleblower protections are provided in two important areas: (1) confidentiality and (2) non-retaliation:

Ad (1): Insofar as possible, the identity of the Whistleblower will be maintained confidential.

Ad (2): The Company will not retaliate against a Whistleblower. This includes, but is not limited to protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, or poor work assignments and threats of physical harm. Any Whistleblower who believes he/she is being retaliated against must contact our compliance department immediately. The right of non-retaliation is guaranteed by the Company and violation of this right will result in disciplinary actions against the violator. The right of a Whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated. Anybody who believes that he or she is the subject of any form of retaliation for a whistleblowing should immediately report the same as a violation of this Whistleblowing Policy to our compliance department.

The Company will treat all information received in strict confidence. The privacy of both the complainant and the subject(s) in the reports will be protected. The use of personal data complies with the applicable data protection laws and regulations.

However, there are two exceptions when a complainant's protection cannot be guaranteed. These exceptions are:

- a) if it is required by law or administrative order or to enable the Company or law enforcement to conduct an adequate investigation;
- b) if it is established that a report has been made in bad faith. The intentional filing of a false report or purposely making untrue allegations does not constitute whistleblowing. The Company takes the practice of reporting in bad faith very seriously. This act is considered to be a serious breach of the Company's Code of Conduct. Disciplinary action will be taken against employees reporting in bad faith, including termination of his or her employment agreement.

How to report?

Employees shall avoid any form of external or internal publicity concerning any breach they might want to report or have reported, unless required to do so by law.

Reports may be submitted by filling out our electronic Whistleblower Reporting Form which is accessible via the following link (Login: User Name: RNTS / Password: Whistleblower):

<http://www.panienka.de:8080/lwc/clientStart.lecare>

An external law firm – the German-qualified lawyer Michael Panienka who is also acting as data protection officer for several of the group companies - providing the service for the



Whistleblower Reporting Form will receive and review the report submitted by you via this link and will initiate an investigation in accordance with our incident management procedures.

All reports of violations or suspected violations will be kept confidential to the extent possible pursuant to the conditions under this Whistleblowing Policy. If there is a need to follow up on the case, and your further support is needed for purposes of investigation, you will be contacted by Michael Panienka first before any further steps are taken.

Questions?

If you have any questions concerning our Whistleblower Policy and procedures, please do not hesitate to contact our compliance department by sending an email to governance@fyber.com.

Your Fyber N.V. Management Board