

WHISTLEBLOWER POLICY FASTNED B.V.

1. Introduction

Fastned B.V. (“Fastned”) is committed to ensure that Fastned, and its management board and employees act at all times in compliance with all applicable laws and regulations and the Fastned Code of Conduct. Fastned’s Whistleblower Policy aims to support compliance with applicable laws, integrity in financial management, a healthier and safer work environment and effective corporate governance.

Fastned conducts its business based on the principles of fairness, honesty, integrity and respect and, accordingly, wants to ensure that any employee of Fastned can make a report under this Whistleblower Policy without the risk of retaliation and with the assurance that all reports are treated confidentially and are promptly investigated.

2. What types of matters should be reported under this Whistleblower Policy?

An employee’s report of suspected irregularities should be substantive, submitted in good faith and related to one of the following issues or conduct:

1. Conduct that is corrupt, dishonest or fraudulent
2. A (threat of) violation of the Fastned Code of Conduct, authority limits or Fastned policies.
3. A (threat of) criminal activity or violation of any applicable law or regulation
4. A (potential) danger to the public or employees’ health, safety and security or the environment
5. Theft or fraud against Fastned
6. Purposeful misinformation or false statements to or by management, to internal or external auditors or to public authorities
7. Inappropriate accounting, financial reporting practices or internal controls
8. Mismanagement or abuse of authority
9. Conduct that is detrimental to the interests of Fastned
10. Intentional suppression, destruction or manipulation of information regarding issues or conduct as described in 1-9 above.

3. How can a matter be reported?

Under this Whistleblower Policy, Employees can report suspected irregularities in the following ways:

Option One: YOUR MANAGER. Employees are encouraged to report matters in the first instance to their manager. Reporting concerns to management is the fastest and preferred way to address a work related issue, to clear up any misunderstandings and to ensure a good and open work environment.

Option Two: CONFIDENTIAL ADVISER. The employee can also report a matter directly to the Confidential Adviser, particularly when: 1. You feel it is not an appropriate issue to discuss with your manager; 2. You do not feel comfortable discussing it with your manager; or 3. You have previously reported the matter and believe no action was taken.

Option Three: CEO / the chairman of the Supervisory Board. If necessary, the employee is also free to report issues to the CEO and/or the Chairman of FAST, as identified on www.fastned.com.

4. What happens once a report is made?

All reports under this Whistleblower Policy will be the subject of an investigation with the objective of locating evidence that either substantiates or refutes the information provided by the whistleblower. All reports will be dealt with in a confidential manner. Confidentiality will be maintained to the fullest extent possible, consistent with the need to conduct an adequate investigation of the report and the privacy laws of the country(ies) involved. As soon as reasonably possible, but at least within 8 weeks, the responsible manager within Fastned will complete its investigation of the report and will notify the whistleblower (if anonymous, then via the Slack Channel or website). If the investigation is not completed within 8 weeks, the whistleblower will be informed of the expected completion date. You may also receive a request to provide further information. Any person against whom an allegation is made, if identified, will be informed of the report as soon as practicable and will be given the opportunity to respond. If a report is found to be false, the record will reflect such a finding and any misinformation will be noted. Fastned is committed to implementing the findings and recommendations of any investigation with a view to rectifying any wrongdoing as far as this is practicable in the circumstances.

5. What happens if a report is anonymous?

Fastned encourages its employees to report any issues or conduct under this Whistleblower Policy directly and openly. If no other option is feasible, the issue or conduct can be reported anonymously via an anonymous letter to Fastned or any other anonymous way think of. Fastned will investigate all anonymous reports; however, please realise that reporting anonymously via one of the options 1- 3 in paragraph 3 above could hinder or complicate investigations and possibly prevent appropriate action from being taken as it may be impossible to reach you for further information.

6. Will an employee be penalised for reporting a matter?

Any employee who reports a matter in good faith or participates in an investigation of a report (and is not found to have been involved in the issue or conduct reported) will not be penalised or personally disadvantaged due to this participation (e.g. by suffering harassment, discrimination, demotion, or dismissal.) An employee who believes he or she has been penalised because of the employee's status as a whistleblower or due to participation in the investigation of a report, should immediately report the conduct through one of the methods identified in this Whistleblower Policy. Any employee or manager who is found to have dismissed, demoted, harassed, discriminated against, or in any other way retaliated against, a whistleblower or a participant in an investigation of a report by a whistleblower, due to their status as a whistleblower or a participant, will be subjected to disciplinary measures that may include dismissal.

7. What if the whistleblower intentionally makes a false report?

While not intending to discourage any employee from reporting matters of genuine concern, it is strongly suggested that the employee ensures, as far as possible, that a report is factually accurate, complete, from first-hand knowledge, presented in an unbiased fashion (with any possible perception of bias of the whistleblower disclosed), and without material omission. Where it is established that an employee is not acting in good faith or that the employee has intentionally made a false report, the employee may be subject to disciplinary measures that may include dismissal.