

Ahrend
**Speak Up
Policy**





Foreword

Royal Ahrend's Code of Business Conduct describes how we want to conduct our business, wherever we are in the world and under any circumstances. Work is more than just providing the best services to our clients. We also have to conduct our business in the right way, by doing the right thing. Whilst focusing on delivery excellence and teamwork, we want to do business responsibly, care for our customers and serve all stakeholders.

At Royal Ahrend we are committed to high standards of integrity and openness in our work. This is only truly meaningful if we remind each other of our commitment whenever we see something inappropriate. In this way we help each other and we help Royal Ahrend as a company¹.

To maintain our high standards, we furthermore encourage our employees who have concerns about a (suspected) violation of the law or our Code of Business Conduct to speak up and share their concerns with us. We understand that it takes courage to speak up. That is why we want a company culture without fear of punishment or unfair treatment for raising such concerns.

If you believe that a situation may be in violation of the law, our Code of Business Conduct or the values described in the Code of Business Conduct, or if it simply does not feel right, please do not keep it to yourself. When you tell us about any concerns you may have regarding, for example, health risks, fraud, bribery, harassment or other types of inappropriate behaviour, you enable us to take action and internally improve the situation.

This 'Royal Ahrend CEE Speak Up Procedure' is a slightly amended version of our 'Royal Ahrend Speak Up Policy' and aims to give all colleagues of Royal Ahrend in the CEE region guidance on how to raise these kinds of concerns.

We hope you will contribute to ensuring that Royal Ahrend remains an excellent place to work by speaking up and raising any concern you may have. We highly appreciate your contribution!

Rolf Verspuij
CEO

¹ The names 'Royal Ahrend' and 'Company' as used in this Speak Up Procedure represent Ahrend a.s. and all its subsidiaries.

1. Why are you encouraged to Speak Up?

Royal Ahrend encourages a culture of openness in which we all help to improve our daily operations. A culture in which we all feel comfortable raising questions and concerns related in any way to our Code of Business Conduct.

If you suspect that a situation within Royal Ahrend may be in violation of the law or our Code of Business Conduct, please do not keep it to yourself. When you tell us about any concerns you may have, you enable us to take action and correct the situation if necessary before it is too late. The same applies if you suspect that our Code of Business Conduct is going to be violated or that a violation has been swept under the carpet.

Although some of you may be nervous about raising such concerns, we encourage you to speak up as soon as something worries you. If you remain silent about a possible violation of the law or our Code of Business Conduct, this can only make the situation worse.

2. Who can use this Speak Up Procedure?

The Speak Up Procedure is open to any employee of Royal Ahrend and anyone who has (had) contact with Royal Ahrend in their work-related activities. That includes anyone who works, is going to be working or has worked for our Company other than on the basis of an employment contract or with whom our Company has or has had a business relationship (such as (potential) suppliers, distributors, subcontractors and customers) who wants to raise a concern about a possible violation of the Code of Business Conduct or

If you have any questions about this Speak Up Procedure, please ask your representative at HR, the local Report Coordinator² or the General Counsel³.

the law within Royal Ahrend. This Speak Up Procedure is also open to (former) trainees and applicants. The aim should always be to improve Royal Ahrend and to ensure we all work responsibly, based on Royal Ahrend's values and the law.

3. No disadvantaging, report in good faith

Royal Ahrend will not tolerate disadvantaging when you raise a concern or decide to file a report in good faith. The same applies if you cooperate in an investigation in good faith. You will in no way be put at a disadvantage as a result of speaking up in good faith.⁴ This also applies if no violation has been determined further to your report. In that way we aim to encourage you to bring any possible violations to the table.

If a person reporting feels they have been or are being disadvantaged by anyone, they can inform us by sending an e-mail to the Corporate Integrity Committee at COBC@royalahrend.com. In case of a person reporting being disadvantaged, Royal Ahrend will ensure that measures are taken against the offender(s). If you were subject to retaliation against you due to reporting a wrongdoing (as defined in Annex C), you are entitled to compensation for non-pecuniary damages.

What does "in good faith" mean here? It means that a person in similar circumstances would reasonably believe or suspect that there is a violation of the law or our Code of Business Conduct and that it is reasonable to raise a concern and/or file a report in that case. On the other hand, if someone abuses this Speak Up Procedure due to personal grievances or for personal gain, this is not in good faith.

Royal Ahrend does not tolerate reporting that is not carried out in good faith. If the filing of a report is not carried out in good faith, this will result in disciplinary consequences for the person reporting, in some cases even leading to dismissal or payment of damages or even to fines for misdemeanour⁵.

However, we will always assume that a report has been made in good faith. Only if our investigation shows that there is clear and unequivocal proof which indicates that a report has not been made in good faith will Royal Ahrend actually classify the report as such.

It may be that you wish to report a possible violation in which you personally participated. When dealing with a report of this kind - and in deciding on possible disciplinary actions - Royal Ahrend will take into account as a mitigating factor that you were the person who brought the matter to light.

4. How do we protect your identity?

Confidentiality and Privacy

At Royal Ahrend, we believe it is of the utmost importance to protect the privacy of all persons involved, in accordance with the applicable laws and our policy. All reports will be handled in a confidential manner. You can help us protect your identity by being discreet and by limiting the circle of people with whom you share your concerns. If you file a report in person in accordance with this Speak Up Procedure, the recipient will know your identity. That person is never allowed to communicate your identity to others without your explicit (written) permission. The only exceptions are if:

- › this is required by law; or
- › if it relates to a crime and Royal Ahrend reports it; or
- › the person reporting did not file a report in good faith.

In any event, you will be informed prior to your identity being communicated to anybody else. The persons against whom the report is made or to whom the report relates have rights too, such as the protection of their identity - as does the person filing it. It is therefore important to always remain discreet and professional.

Sometimes keeping your identity confidential can hinder or complicate an investigation. Sometimes it even prevents Royal Ahrend from being able to take appropriate actions. In such instances, you will be asked for written permission to share your identity. Your identity will only be shared (after you have given your written permission) with persons who need to know the identity in order to be able to conduct a proper investigation. If your report relates to another person or other people, the identity of that person/ those people shall also be kept confidential.

Any personal data obtained as part of an investigation as described in this Speak Up Procedure will only be used for the purposes described in this document. Such data will only be given to those persons who need to know in the context of the investigation or for the necessary follow-up measures. These persons will also be bound by confidentiality. The only exceptions are if:

- › disclosure is required by law; or
- › if it relates to a crime and we report it; or
- › you did not file a report in good faith.

² See Annex B for your local Report Coordinator.

³ Currently Charlotte van Dijk; she is the primary contact person for the Corporate Integrity Committee.

⁴ For completeness' sake, Dutch employment law specifically prohibits an employer from prejudicing an employee (in the meaning of article 7:610 of the Dutch Civil Code) because he reports in good faith wrongdoing in the meaning of the Dutch Whistleblowers Protection Act (Wet Bescherming Klokkeluiders) to the employer or the competent authority during or after the processing of such a report (article 7:658a of the Dutch Civil Code).

⁵ Fines may depend upon applicable local legislation. E.g. in the Czech Republic, in case of Report of wrongdoing you may be subject to a fine for misdemeanour up to CZK 50 000. In addition, if you file a Report of wrongdoing in bad faith, the retaliatory measures under the WPA may be applied.

5. What kind of issues can or must be raised?

Employees and interested parties are encouraged to raise any concern if they believe an incident is not in line with our Code of Business Conduct or the law.

For example: possible criminal conduct, administrative misconduct or other tort liability of Ahrend, its employees or third parties.

This Speak Up Procedure is not intended to channel complaints about terms of employment, annual appraisals or similar matters, for which personnel procedure applies.

Any suspicion of a (threat of) violation of the law or our Code of Business Conduct can be raised. However, certain issues present risks which are so high that they cannot be ignored and employees must report them immediately. This is the case for circumstances which:

- › can endanger the health or safety of any person⁶, or
- › seem to be in violation of a law for which a person could go to jail or for which Royal Ahrend could end up paying a substantial fine (like fraud, theft, bribery and/or anti-competitive behaviour) or could cause serious damage to reputation.

6. What if you do not have all the facts?

Please raise your concern, even if you do not have all the facts. Remember that the aim is to improve Royal Ahrend and to ensure that we all act ethically and follow our Code of Business Conduct and the law. You should not attempt to conduct your own investigation. We leave that to the Corporate Integrity Committee.

7. What if you need advice or support?

Role of the Confidential Advisor

If you are uncertain whether a particular situation is or is not an issue that can be raised through this Speak Up Procedure, e.g. whether it concerns a violation of our Code of Business Conduct or if you are looking for support in filing a report, you are encouraged to first raise your concern on a confidential basis with your manager or supervisor, a Human Resources representative, or the General Counsel. They will be able to offer you confidential advice on possible next steps. You can also contact a Confidential Advisor. They can assist you completely confidentially and discuss all options with you, such as resolving the matter informally by engaging in a dialogue with those involved, a supervisor or a mediator. A Confidential Advisor will not conduct their own investigation. More information on the role of Confidential Advisors [can be found here](#).

8. Which channels can you use to file a report?

You are free to choose how you wish to file a report. You can do so in person⁷/in writing/by sending an e-mail to the Report Coordinator (see Annex B) or directly via COBC@royalahrend.com to the Corporate Integrity Committee. If you wish to make contact by telephone, or to discuss the matter in person on site, you can do that too.

Royal Ahrend has established a Corporate Integrity Committee consisting of Royal Ahrend's Chief Executive Officer, Chief Financial Officer, General Counsel and Human Resources Manager. On behalf of the Corporate Integrity Committee, the General Counsel receives all



⁶ Please note that health, safety and security issues (e.g. unsafe conditions, situations or acts), which pose a serious and immediate danger to you or your colleagues, should always be reported through the most expeditious means possible, using normal management channels, for example verbally to your supervisor or manager. This Speak Up procedure only applies to health, safety and security issues if you believe that the matter is not being dealt with adequately by management.

⁷ In a case you request a competent person for an in person meeting, a meeting with a competent person will be scheduled within a reasonable period of time, but not later than 14 days from the date of the request for such meeting.

reports, records them in a confidential register and coordinates all reports. The General Counsel functions independently, impartially and neutrally with respect to the work under this Speak Up Procedure.

However, we hope that you feel sufficiently comfortable in your work environment to raise your concerns directly with the person concerned in an appropriate manner (e.g. by telling that person your concerns or views). If it is not a report of wrongdoing as defined in Annex C, you may raise your concerns with your own manager or supervisor (or your supervisor's manager) or the HR department. These steps are encouraged because it is the fastest way to clear up any misunderstandings and to ensure an open and safe working environment throughout the Company. It may be possible to resolve your concerns effectively and efficiently this way. If your concern is not satisfactorily resolved through your supervisor, if it is a report of wrongdoing as defined in Appendix C, or if you are unsure of the legal nature of your report, you should submit a report through your local Report Coordinator, the Corporate Integrity Committee at COBC@royalahrend.com, or in paper form/by phone/ in person to one of the following members of the Corporate Integrity Committee: Royal Ahrend's General Counsel; or Royal Ahrend's CFO.

If you feel uncomfortable discussing a concern with your manager or supervisor or the HR department, or if it is not possible to do so, you may of course also choose to file your report through the aforementioned channels. If access is difficult or if you feel uncomfortable approaching any of the people above (for example because you fear retaliation), you can also send an (anonymous) email to the Corporate Integrity Committee: COBC@royalahrend.com.

Reports relating to members of our Executive Board or the Corporate Integrity Committee can be sent directly to the Chairman of the Supervisory Board: VoorzitterRvC@ahrend.com.

9. What to include in a report

When filing a report, please provide any information you have available and think could be relevant or may be useful (without conducting an investigation yourself; we leave that to experienced investigators). This enables the recipient of the report to assess the matter as quickly as possible. Examples of relevant information are: a description of what you saw, heard or experienced; the relevant background information; the reason for your concern; and the names, dates and places related to your concern. To file a report you can use the template provided in Annex A to this Speak Up Procedure, but feel free to file a report in a format of your choice.

10. What happens after you file a Report?

The General Counsel of Royal Ahrend or the Report Coordinator involved will acknowledge receipt of the report to the person filing the report within 7 days, if contact details are available.

After a report is filed (verbally or over the telephone), Royal Ahrend will draw up a written record of the conversation. In such cases, the person filing the report will always be given the opportunity to make corrections before being asked to sign it. If Royal Ahrend wishes to have a discussion (over the telephone), we will always ask the person filing the report for permission to do so beforehand.

The General Counsel registers all reports. After registration of a report, the General Counsel forwards this to the members of the Corporate Integrity Committee. All the persons involved in an investigation under this Speak Up Procedure are obliged to maintain confidentiality.

The Corporate Integrity Committee will have each report received screened and will determine:

- ▶ whether it gives rise to a reasonable suspicion of a violation of the law, our Code of Business Conduct, and whether further investigation is needed; or
- ▶ whether a different procedure or approach applies (e.g. annual appraisals or quality, safety or other procedures).

The General Counsel or the Report Coordinator involved will inform the person filing the report about this, unless the interest of the investigation precludes this.

In particular in cases of undesirable conduct in the workplace (such as intimidation, discrimination and sexual harassment), a de-escalating approach is desirable in order to rebuild trust and the work relationship. In such cases, after receiving a report the Corporate Integrity Committee can propose additional measures in the short term or a different approach

such as conciliation, mediation, a group discussion, workshop or coaching/training for the person accused.

If the Corporate Integrity Committee believes that an investigation is needed, the Corporate Integrity Committee can appoint one or more investigators. The investigators have the authority to instruct others within the Company to take temporary measures (e.g. in order to ensure that physical evidence or digital information is properly safeguarded). Employees are required to cooperate fully with an investigation immediately and to provide any available information and documentation requested by an investigator.

The Corporate Integrity Committee shall give the person filing the report updates regarding the progress of the investigation, unless the interest of the investigation precludes this. You shall be informed of the admissibility of your report within 30 days from its receipt. If The General Counsel or the Report Coordinator cannot provide that information within 30 days due to the complexity of the case, the time limit may be extended by 30 days. After this period a third extension of 30 days may be possible, considering the situation. The General Counsel or the Report Coordinator will always inform you of such extension before the expiry of the time limit. Please beware of the fact that the obligation to inform you on the progress of the investigation within this period of 30 days does not necessarily have to in sync with the serving of the remedy and/or judgement on the matter. It just serves as an additional safeguard, so that the reporter actually receives all the relevant information on the progress of the investigation that he reporter deserves.

⁸For a local definition of 'wrongdoing' please check your local legislation. For the Czech definition please see Annex C.

⁹For the Czech Republic the dedicated authority could be the Ministry of Justice (<https://whistleblower.justice.cz/>) or the police or another government agency.



In the case that a report raises a concern about (a) specific person(s), this/these person(s) will be informed by the investigator during the course of the investigation. The Corporate Integrity Committee will ask the person(s) to give their view on the alleged facts and – at a later stage – inform them of the results of the investigation, unless the interest of the investigation precludes this. If reasonably possible, this/these person(s) will not be informed about the identity of the person filing the report without this person's prior permission.

Upon completion of the investigation, the Corporate Integrity Committee will pass judgment on the matter and, if necessary, take a decision on appropriate measures. These can include disciplinary measures against the offender(s) and/or organisational measures (i.e. processes and procedures) to prevent such an incident from happening again.

Unless the interest of the investigation or the nature of the measures preclude this, the General Counsel or the Report Coordinator will inform the person filing the report of the outcome of the investigation.

If the Corporate Integrity Committee considers the report received to be materially unfounded, the Corporate Integrity Committee shall without undue delay inform you in writing that, on the basis of the facts set out in the report and the circumstances known to it, it does not suspect that a wrongdoing has been committed, or has found that the report is based on false information. If you disagree with this decision, the Corporate Integrity Committee shall advise you of the right to file your report with a public authority (see paragraph 11).

If the Corporate Integrity Committee considers the Report received to be substantially justified, he shall propose to Royal Ahrend measures to prevent or remedy the infringement. If Royal Ahrend does not accept the action proposed by the Corporate Integrity Committee, it shall take other appropriate action to prevent or remedy the breach. Royal Ahrend shall promptly notify the Corporate Integrity Committee of the action taken and the Corporate Integrity Committee shall promptly notify you in writing of the action taken, unless you have expressly requested not to be notified or it is clear that notification of the action taken would disclose your identity to another person.

Every year the Corporate Integrity Committee will report to the Supervisory Board on the reports investigated and any actions undertaken as result of any investigation which has been concluded.

11. Filing a report with an external party **Whistleblowers Protection Act**

The European Whistleblowers Directive opens up the possibility of reporting wrongdoings within the meaning of this Act (art. 2), externally. If you wish to file a report externally, the action in question must constitute a serious wrongdoing, in which the public interest is at stake. The definition of 'wrongdoing within the meaning of this Act has been implemented in local legislation per country¹⁰.

We strongly urge you to report such serious wrongdoings via the channels described in this Speak Up Procedure, or to discuss your plans with a Confidential Advisor, the General Counsel or the Corporate Integrity Committee first. That is because we are confident that Royal Ahrend can handle any report efficiently internally. Royal Ahrend aims to protect the person filing the report against reprisals and we endeavour to improve organisation together, day in day out.

¹⁰ For a local definition of 'wrongdoing' please check your local legislation. For the Czech definition please see Annex C.

Should you still decide to make an external report of serious wrongdoing as referred to above, you may do so, for example, to the dedicated authority in your country¹¹ or the police or another appropriate government agency. In such cases, you are also protected, provided you act in good faith and comply with the requirements of the Act. The publication of a Report of a wrongdoing is possible only in the case of event of (i) inaction by the person who received the Report, (ii) imminent threat to specially protected interests or (iii) increased risk of retaliation or jeopardising a proper investigation of the notification.

We wish to point out that if you choose to approach external parties with your report, you must continue to abide by the rules regarding privacy and our policy with regard to social media and confidentiality, for example; you must therefore check to make sure that the knowledge that you have and are going to share has been obtained lawfully and may be shared. If you are considering filing a report with an external party, you can also obtain confidential advice and support via an external advisory service, such as the Czech Ministry of Justice.

All in all, we expressly advise you not to approach an external party unless:

- › you have carefully evaluated the matter first, and
- › there is no potentially less damaging option available, and
- › you cannot reasonably be expected to report the matter internally first, and
- › an urgent public interest is at stake or if it is required to report due to a statutory obligation or law.

Furthermore, we ask that you always make sure that:

- › you minimise the possible negative impact on Royal Ahrend, our stakeholders and the persons involved as much as possible, and
- › the third party with whom you wish to raise the issue is in fact able to organise appropriate action against the suspected wrongdoing.

The eligibility conditions for protection vary from country to country, also within the European Union, so we cannot include all of them here. If you are unsure where to report any such serious incident externally, you can be confident that nationally appointed government bodies for whistleblowers can often provide good advice. Should you require the address of such a whistleblowing authority, please consult the General Counsel, in-house lawyer or your Confidential Advisor at Royal Ahrend.

What if local law deviates?

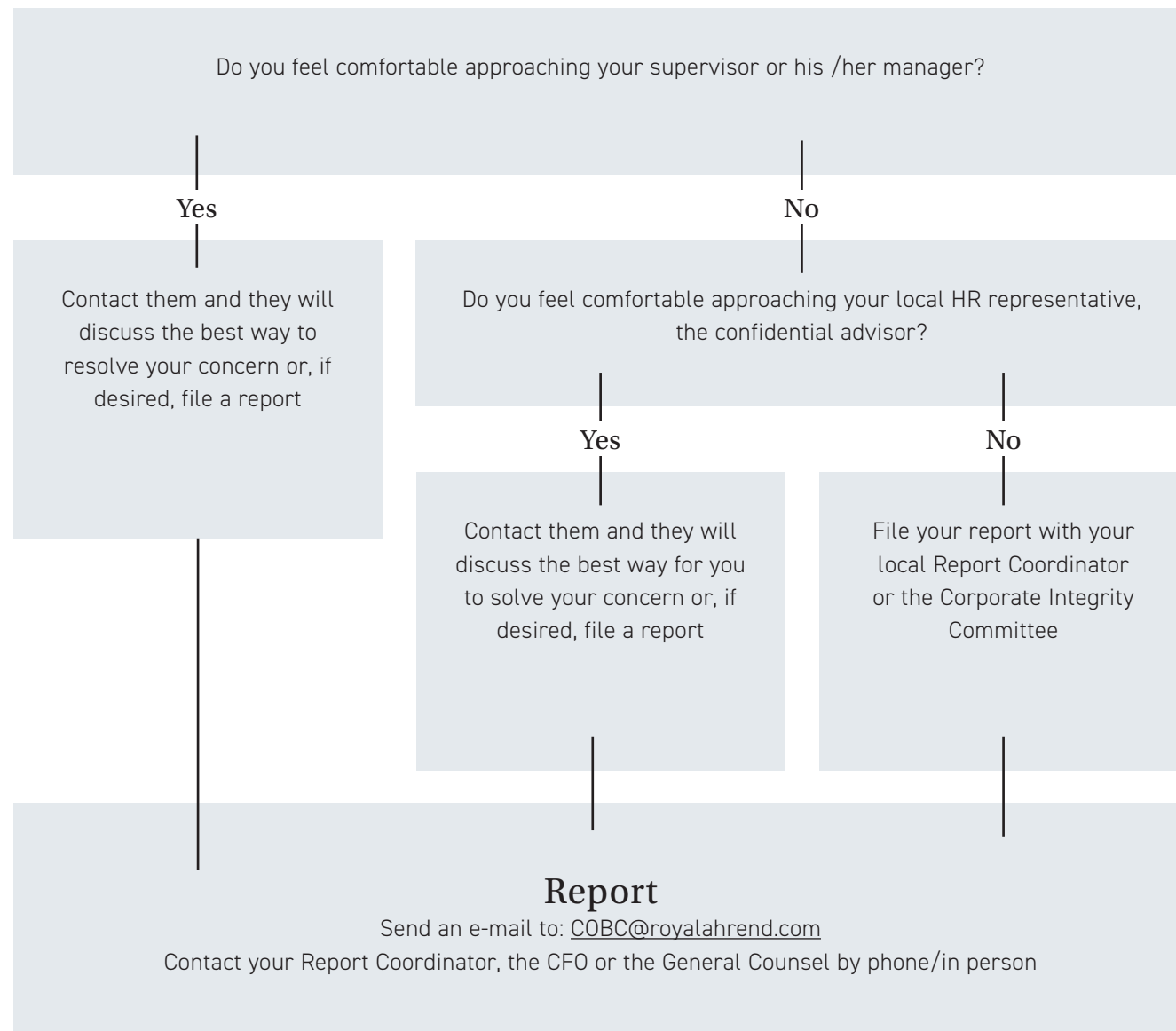
In case local law grants more rights or is more stringent, then local law prevails in those instances. In other cases you can choose to rely on local law as well as the rights granted to you in this Speak Up Procedure.



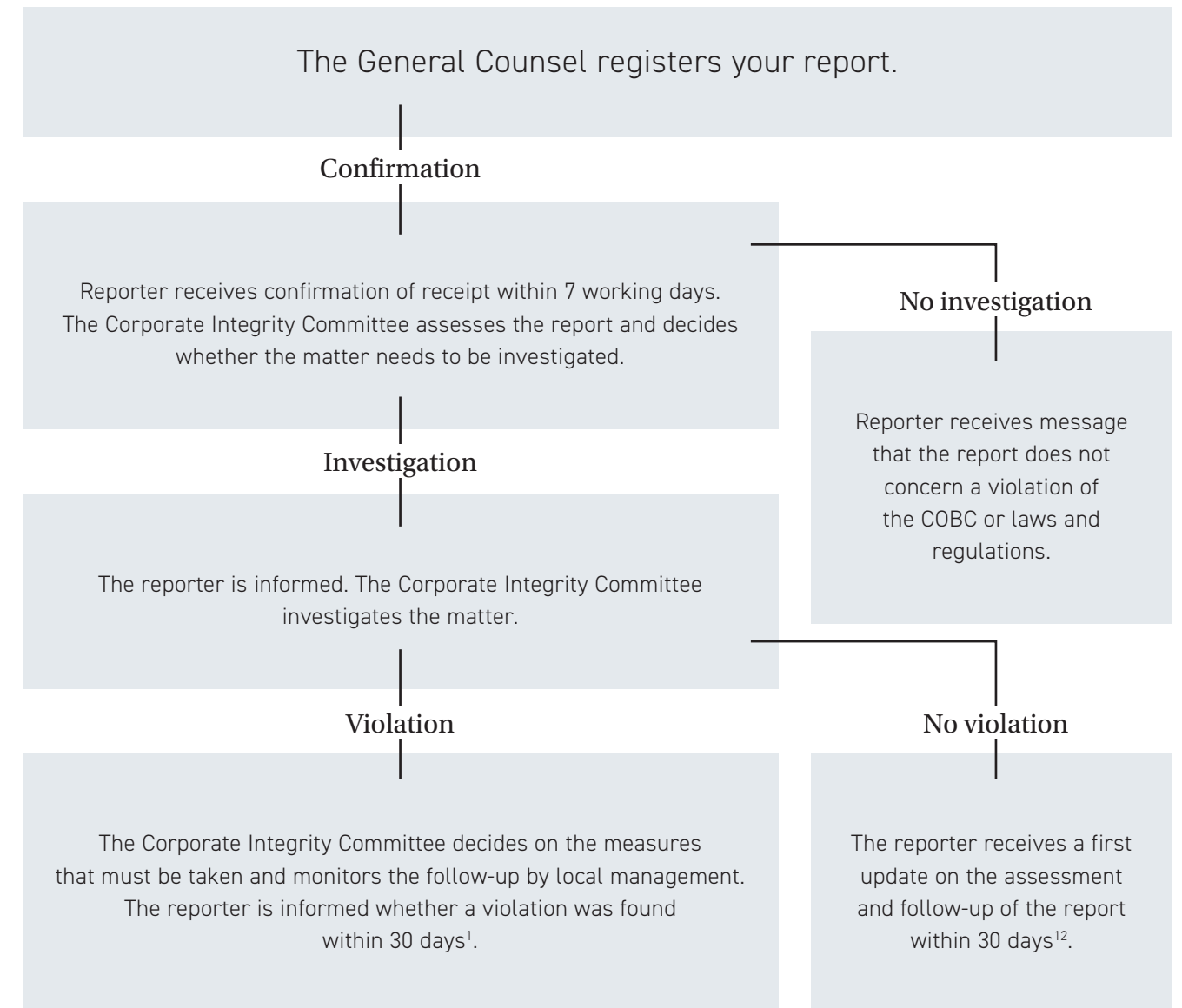
Consider reporting

I suspect an (imminent) violation of the law or our Code of Business Conduct.
With whom can I share it?

Do you want to raise a concern, do you need confidential advice or are you looking for support in filing your report? Speak to your supervisor or manager (or his/her manager), an HR representative, the General Counsel, your local Report Coordinator or a confidential advisor.



What happens if I file a report?



¹² In case of an extension of the deadline, you will be informed accordingly. Possible extension of 2x 30 days.

Annex

Annex A - Form for filing a report

This is an example of a form you can use to file a report with your supervisor or manager (or his/her manager), with your Human Resources representative, with the General Counsel or via COBC@royalahrend.com. Use of this template is optional; please feel free to use any format you feel comfortable with.

Do you want your identity to remain confidential?

Please note that the recipient of this report will be aware of your identity. If you do not want this, you can send this form anonymously to COBC@royalahrend.com

Personal information

First and last name:

Phone number:

Email address:

Best time to communicate with you:
(including your time zone)

Best way of communicating with you:
phone / email / personal

Name of your operating company / corporate department:

Report of possible violation

What is the possible violation of our Code of Business Conduct or wrongdoing you want to report?

Do you have a serious suspicion or are you sure?
Serious suspicion / I am sure

When did it occur?
(Please estimate if exact dates are not known)

Where did it occur?
(Please fill in the location, document or transaction, as applicable)

Who, in your opinion, are the persons involved?
(Please fill in the first and last names and functions to the fullest extent possible)

What, in your opinion, is the potential damage to Royal Ahrend?
(Financially or otherwise to the extent you have visibility on this)

Do you think it will happen again?
Yes / no / not sure

Personal action

How did you become aware of the situation?

Have you reported the situation to anyone else within Royal Ahrend first? If yes, what was the outcome?

If no, why not?

Please include name(s) of person/people to the extent you feel comfortable with that

Do you know of any other person(s) who is/are aware of the situation, but who is/are not personally involved?

Please include name(s) of person/people to the extent you feel comfortable with that

Yes:

No

Do you have any physical evidence which you can share with the investigators?

Please only provide evidence you have readily available, please do not investigate yourself; we leave that to experienced investigators.

Yes:

No

Please provide any additional information you have which you believe may be relevant:

May we disclose your identity to the investigators so that they can ask further questions?

If so, please sign here:

If not, please write 'NO' here:

Annex B - List of local report coordinators per company

Company	Report Coordinator	
Ahrend a.s. Ahrend Kft. Ahrend s.p.z.o.o. Ahrend s.r.l. Ahrend s.r.o. Ahrend Ukraine Ltd. Interier Ricany a.s. (and all other Ahrend CEE entities)	Michal Toth <i>Finance manager</i>	+420 737 210 737
	Veronika Indrová <i>HR manager</i>	+420 737 218 623
		Or send an email to the following address: competent.person@ahrend.com

Annex C – Definition of ‘wrongdoing’

The official definition of a ‘wrongdoing’ according to Czech law, the Czech Whistleblowers Protection Act is:

“a conduct that:

- a) has the elements of a crime,
- b) has the characteristics of a misdemeanour for which the law provides for a fine with an upper limit of at least CZK 100 000,
- c) violates this Act, or
- d) infringes another legal regulation or a regulation of the European Union in the field of:
 1. financial services, statutory audit and other assurance services, financial products and financial markets,
 2. corporate income tax,
 3. prevention of money laundering and terrorist financing,
 4. consumer protection,
 5. compliance with product requirements, including product safety,
 6. transport, traffic and road safety,
 7. environmental protection,
 8. food and feed safety and animal health,
 9. radiation protection and nuclear safety,
 10. competition, public auctions and public procurement,
 11. protection of internal order and security, life and health,
 12. protection of personal data, privacy and security of electronic communications networks and information systems,
 13. the protection of the financial interests of the European Union, or
 14. the functioning of the internal market, including the protection of competition and State aid under European Union law.”

The Whistleblowers’ Authority has tried to summarise this definition as follows:

“What conduct can be reported?”

Whistleblower protection applies to the reporting of workplace misconduct:

- › Having the elements of a criminal offence.
- › Having the characteristics of a misdemeanour with a maximum fine of at least CZK 100,000.
- › Violating the Whistleblower Protection Act.
- › Violating other legislation or EU regulation in selected areas.”

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Vitalising Workspaces