



proximus

Group Compliance

Whistleblowing Procedure

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Group Compliance Office

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Objective and scope

Proximus considers integrity as one of the corner stones of its DNA.

By giving the Proximus Group the means to enforce our code of conduct, other group policies, laws and regulations, you help build and secure the future of the Proximus Group, through mitigating the risk of reputational damage and limit financial loss.

Therefore, the Proximus Group Compliance Office sets up a whistleblowing mechanism which enables both employees and external parties to report any breach of the Code of Conduct, internal policies and procedures, laws and regulations, in a confidential manner.

1. What is a whistle-blower and why is this role so important?

Whistle-blowers are people who speak up when they encounter wrongdoing in the context of their work. These persons can have the status of worker, contractor, supplier, shareholder or belong to administrative, management or supervisory body of an undertaking, including non-executive members, as well as volunteers and paid or unpaid trainees.

Whistle-blowers' reports are extremely important as they can lead to effective detection, investigation and follow-up of wrongdoing and/or breaches of the Code of Conduct, internal policies and procedures, laws and regulations that would otherwise remain hidden. Encouraging persons to report such wrongdoing and protecting them when they do, is essential to prevent corruption.

The whistle-blower mechanism enables the enforcement of the Proximus Group's ethics and compliance rules: with every concern raised, you help identify the group's weaknesses.

2. I wish to report a concern

2.1 Who can report a concern?

This procedure is applicable to anyone who acquired information on breaches in a work-related context with the Proximus Group: employees, contractors, sub-contractors, suppliers, shareholders, trainees, managers etc.

2.2 What types of concerns can be raised?

Concerns about:

- A potential wrongdoing of laws and regulations
- A potential wrongdoing regarding the Code of Conduct and other Proximus Group policies
- Issues that might affect the public interest
- Issues that might affect any entity of the Proximus Group
- Personal grievances experienced during or related to working with any Proximus Group entity

2.3 How to raise a concern?

The Proximus Group provides both an internal reporting and an external reporting channel.

We strongly recommend reporting through the internal reporting channel first, before reporting through the external reporting channel. By reporting through the internal reporting channel, the concern can be addressed effectively internally by the Proximus' Group Compliance Office itself, allowing the Proximus Group to take immediate measures.

2.4 Internal reporting channels

Should you become aware of an infringement of laws, regulations, the internal policies and procedures or the Proximus Code of Conduct, you should raise this concern promptly with your manager, your prevention advisor (psychosocial aspects) or if fraud related, to the investigations department (investigations@proximus.com).

If this is not possible or appropriate, for whichever reason, please raise the issue or report the infringement directly by using one of the following whistleblowing channels in order to have your report treated in a confidential manner:

- **EMAIL:** whistleblowing mailbox: whistleblower@proximus.com

- **PHONE:** whistleblowing hotline (24h/24h – 7 days a week):
 - From Belgium: **0800 45002**
 - From abroad : **+32 (0) 800 45002**

- **LETTER:** (ensure you indicate **CONFIDENTIAL** on the envelope)
 - **Proximus Group Compliance Officer:** Bruno de Hemptinne, Proximus - Group Compliance, 27 Boulevard du Roi Albert II, B 1030 Bruxelles
 - or
 - **President of the Audit & Compliance Committee:** Catherine Vandendorre, Proximus – President of the Audit & Compliance Committee, 27 Boulevard du Roi Albert II, B 1030 Bruxelles

- **IN PERSON:**
 - by setting up a meeting with the Proximus Group Compliance Officer
 - By phone by dialling: +32 485 74 32 63
 - By email: bruno.de.hemptinne@proximus.com

2.5 Follow-up

If you make yourself known in your report, you will receive **acknowledgement of receipt within 7 calendar days** (maximum) after the receipt.

The person who is responsible for the follow-up of your concern, the Proximus Group Compliance Officer or a team-member of Proximus Group Investigations, shall log this in a separate register and shall start a preliminary investigation to verify whether the concerns seems prima facie (at first sight) founded. This person will also maintain communication with you and, where necessary, ask for further information.

The whistle-blower's committee shall follow up on any reports and shall take the final decision based on the case (and proof) presented to the committee by Proximus Group Investigations.

2.5.1 The whistle-blower's committee

For each whistleblowing case a whistle-blower's committee shall be composed of:

- The Proximus Group Compliance Officer
- The Proximus Group Investigations Manager
- The Head of Legal (or delegate) of the concerned Proximus Group entity. If no such function exists within the concerned entity, the Head of Legal (or delegate) at Group level will be appointed.
- The Head of HR (or delegate) of the concerned Proximus Group entity. If no such function exists within the concerned entity, the head of HR (or delegate) at Group level will be appointed.
- If not yet represented by the above functions, a member of senior management depending on the report at hand.

The members of any whistle-blower's committee, responsible for the follow-up of a report, are **bound by confidentiality**, in accordance with applicable laws and regulations. However, only the Proximus Group Compliance Officer and the Proximus Group Investigations department shall have access to the identity of the whistle-blower.

You will be informed within a timeframe of **maximum 3 months** (following the acknowledgment of receipt) about the action envisaged or taken as follow-up to the report and the grounds for the choice of that follow-up.

The identity of the whistle-blower will always be kept secret. All necessary and possible measures are taken to avoid people becoming victims of false accusations.

2.6 External reporting channel

In accordance with the EU Directive 2019/1937 Of The European Parliament And Of The Council Of 23 October 2019 on the protection of persons who report breaches of Union law, the Belgian state is under the obligation to designate the authorities competent to receive, give feedback, follow up on reports, and shall provide them with adequate resources.

An external reporting channel will be communicated to Proximus Group personnel as soon as a competent authority has been established by the Belgian State.

3. Duty of Confidentiality

When you raise a concern, **the secrecy of your identity as a whistle-blower will be guaranteed** in accordance with the applicable laws and regulations.

Your identity will not be disclosed without your explicit consent to anyone beyond the authorised persons competent to receive or follow up on reports. This also applies to any other information from which your identity may be (in)directly deduced.

Only if there is a necessary and proportionate obligation imposed by EU or national law in the context of investigations by national authorities or judicial proceedings, your identity might be disclosed, including with a view to safeguarding the rights of defence of the person concerned.

4. You may remain anonymous

You can file a concern anonymously. This means that even the recipient of the concern will not know your identity. Therefore you may want to file your concern by **letter**. We insist that you indicate **CONFIDENTIAL** on the envelope to ensure your letter follows the process for confidential post by our internal post services.

Proximus recommends that you disclose your identity when you report a concern. This way we know who we need to protect (you) and who we can turn to for additional information so that no one is falsely accused on basis of wrong information.

An anonymous report will only be considered valid if it contains enough factual elements that allow to investigate the facts. Therefore, please include **as much detail as possible** to mitigate difficulties investigating and following up on an anonymous report

5. Protection of the Whistle-blower

No member of the personnel of the Proximus Group who reports an event may be sanctioned or subject to any discriminatory measure for having notified an alert selflessly and in good faith via the whistleblowing mechanism.

Proximus does not allow retaliation of any kind against those who, in good faith, report an infringement or suspicion of an infringement of the rules or guidelines. If you report a concern and it appears that you were genuinely mistaken or if there is an innocent explanation for your concerns, you will not be sanctioned or subject to a discriminatory treatment.

This assurance does not apply to those who maliciously start an investigation for a matter that is false.

6. Compliance Control Monitoring Process

A dedicated control plan will be developed by the Group Compliance Office in order to verify the correct application of this group procedure.

This control plan will verify various points such as the respect of secrecy of the identity of the whistleblower, the composition of the whistleblowing committee, communication within affiliates, ...