

## **Cofinimmo – Notification policy for irregularities «Whistleblowing»**

### **Introduction**

When an employee detects a professional error or irregularity in the management of Cofinimmo (or one of its subsidiaries) that may cause possible harm to the company, directly or indirectly, it is important that the error or irregularity is known to the management and that the staff member can notify it.

Transparency is a part of the corporate culture. To avoid that an employee needs to solve alone a difficult situation on the ethical level. He or she must particularly consider going to a supervisor or the Human Resources Manager. If such an approach gives him or her an uncomfortable feeling, he or she can find the required help in this "Notification or Whistleblowing Policy".

A whistleblowing policy protect employees, so as to avoid being subjected to undue pressure, harassment, intimidation, disciplinary proceedings or the threat of losing their jobs as retaliation.

### **On which situation of the policy do this refer to?**

This policy refers to situations in which a person of the Company (the informant) raises a concern about irregularities that he or she identifies that affects or could affect third parties, including customers, suppliers , other members of the company, the company itself (its estate and the results, and reputation ), its subsidiaries or the public interest. It applies to the whole group of staff of Cofinimmo.

### **What is meant by "irregularity"?**

Irregularities may include:

- A fraud;
- A violation of the laws or regulations;
- A global unacceptable practice as immoral conduct or unethical behavior (which may endanger the health / safety of a person );
- A serious professional misconduct;
- A possible violation of the Code or the "Dealing Code" Cofinimmo (sale or purchase of financial instruments - such as stocks or bonds - issued by Cofinimmo by directors or employees).

### **On who does this policy applies to?**

This policy applies to all persons working on behalf of the company, including:

- All employees, temporary workers and trainees;
- Partners and subcontractors;
- Consultants.

### **Treatment procedure of "Whistleblowing policy»**

All persons targeted by the policy may communicate its concern at the "Compliance Officer". This function is currently performed by F. Roels. The targeted people can also choose to communicate their concerns to another member of the Executive Committee or a member of the Audit Committee.

### **All "Whistleblowing notifications" will be kept confidential in this context.**

The informant must declare making the declaration under the Whistleblowing Policy of the company. This will assure him or her that the Compliance Officer or member of the Executive Board / Audit Committee will be aware and will take the necessary measures to analyze the report and to protect his identity. In advance the Compliance Officer or member of one of the two committees will talk about the confidentiality of the investigation and possible progress.

The informant will be kept informed of the progress and the results of the investigation within the limits of maintaining the confidentiality and respecting the legal restrictions. A confidential report will be written to report the stages of the procedure.

### **What are the fundamental elements of this policy?**

Each Whistleblower reporting will bring a full investigation including an interview with all witnesses and all other parties involved.

The identity of informers is protected at all stages of the procedure. If the company is able to guarantee the anonymity, it cannot be guaranteed in the event of legal action. The Company is not responsible for maintaining the anonymity of the informant when they talk to others about the alleged irregularity.

Even when the company encourages informants to identify him- or herself, the anonymous reports will be seriously analyzed with the same procedure, despite the lower efficiency.

If it appears that a person makes maliciously or in bad faith a whistleblower report, it could be subject to disciplinary actions. The messages to aim colleagues or third parties not related to an irregularity which directly or indirectly cause or may cause damage to the company, will be removed.

### **Some common questions:**

*What is the difference between a " Whistleblower notification " and a complaint?*

When a person files a complaint, he or she detects a case in which she/he was a victim of wrongdoing. The last case may consist of a violation of his or her own rights at work and harassment and the complainant demands compensation and justice. There is therefore a personal interest in relation to the consequences of the complaint and the complainant should therefore be able to provide proof of his or her claims. The "whistleblowing" occurs when an employee brings forward an irregularity in others (eg. customer or employer). The informant must have no evidence of what he or she claims; he or she reports rather that others have to take charge of this evidence. This is different than a complaint.

*Can a Whistleblowing notification be in confidence or anonymously?*

In general, the best way to report a irregularity is doing this openly. This will make it easier for the company to analyze the problem, determine how to investigate the matter, to understand the possible motives and to obtain more information. A "Whistleblower notification" is considered confidential when the informant gives his or her name with the condition that it shall not be revealed without his

or her consent. A whistleblowing notification is considered anonymous when the informant does not give his or her name at all. If the company does not know who supplied the information , it will not be able to reassure and protect this person.

*Where ends the notification and where begins the charge?*

The notification is designed to prevent or restore damage to the company, its staff, its customers and suppliers, its reputation. The charge is to report facts or opinions about a third person, on objective or subjective basis , with the aim of harming him or her. This policy is not intended to encourage this attitude.

*What information should contain a notification?*

Any element that can support his or her statement, if known by the informant, is obviously useful.

*Where does the notification begins and where does begins the accusation?*

The notification is designed to prevent damage or restore to the company, its staff, its customers and suppliers, its reputation. The charge is to report facts or opinions about a third person, on objective or subjective basis, with the aim of harming him or her. This policy is not intended to encourage this attitude.

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