



Telenet Whistleblower Policy (June 2023)

1. INTRODUCTION

1.1 PURPOSE

Telenet's whistleblower policy encourages anyone to report behaviour that is unethical or illegal. It describes the channels available to a whistleblower reporting to Telenet and sets out the guidelines about how to make a report, how a whistleblower report will be treated and the protections available to them under the Belgian whistleblowing legislation: the Act of 28 November 2022 on the protection of persons reporting on breaches of Union or national law established within a legal entity in the private sector.

1.2 SCOPE

This Policy applies to Telenet Group Holding NV and all its majority-owned subsidiaries and institution for occupational retirement (hereafter the "**Telenet Group**").

1.3 WHO IS A WHISTLEBLOWER?

A whistleblower is someone who makes a report under this policy. This policy is applicable for external parties such as suppliers, shareholders and other stakeholders.

This policy does not apply to employees. They should consult the internal whistleblower policy.

1.4 WHAT CAN BE REPORTED?

If you become aware of or suspect an infringement of existing laws and regulations, you are requested to report such improper conduct as promptly as possible to one of the channels as listed in section 2.1.

An infringement can be either:

- An actual infringement of existing laws (conduct that is dishonest, corrupt or illegal);
- A potential infringement that is likely to occur;
- An attempt to conceal an infringement.

Examples of infringements include, but are not limited to:

- Harassment and bullying;
- Illegal or unethical conduct, such as theft, violence or threatening with violence, substance abuse and property damage;
- Discrimination;
- Bribery or corrupt behavior;
- Financial reporting irregularities;
- Failure to comply with, or breach of, legal or regulatory requirements (e.g.: Competition Law, Chinese Walls,



market abuse regulation);

- Activities that may lead to environmental damage;
- Irregularities in the protection of privacy and personal data, and security of network and information system;
- Engaging in or threatening to engage in retaliation against a person who has reported a concern;
- Money laundering or terrorist financing; or
- Human rights infringements;

2. HOW DO I REPORT A WHISTLEBLOWER CONCERN?

2.1 CHANNELS FOR REPORTING A CONCERN

Telenet channels

If someone wants to report a concern, they can use our secure web-based reporting system ([Whispli](#)). The tool is operated by a third-party and is available 24 hours a day, seven days a week. By reporting through Whispli, the concern can be addressed effectively, allowing Telenet to immediately assess the report and take action where needed.

A report can also be made to the Chair of the Audit and Risk Committee (Lieve Creten).

Externally

Telenet encourages you to report your concern via our whistleblower channels. However, if you feel more comfortable, you can also report your concern to the Federal Ombudsman through the website <https://federaalombudsman.be>.

Depending on the nature of the report, you can also go directly to one of the authorities designated by the [Royal Decree of January 22, 2023](#) designating the authorities for the implementation of the Act of 28 November 2022 on the protection of persons reporting on breaches of Union or national law established within a legal entity in the private sector.

Public Disclosures

In the event that reports are not processed, no appropriate measures were taken or due to particular circumstances (e.g. if there are serious reasons to believe that there's an immediate threat to the public interest or if there's a risk of destruction of evidence), the whistleblower may also report suspected breaches of EU law via public disclosure.

2.2 ANONYMOUS REPORTING

When submitting a report, Telenet encourages you to identify yourself and to provide as much details as possible regarding your allegations. If, however, you would feel more comfortable communicating your concerns anonymously you may do so through the web-based reporting system ([Whispli](#)). Be aware however that it is often more difficult to properly investigate matters communicated anonymously.

2.3 WHAT SHOULD I INCLUDE IN THE REPORT?

Please provide as much detailed information as possible so that your allegation can be investigated. Some useful details include:



- date and location;
- names of person(s) involved, job position and department;
- your relationship with the person(s) involved;
- the nature of your concern;
- how you became aware of the issue;
- possible witnesses;
- support documentation;
- if the concern has already been reported through another channel;
- preferred form of communication; and
- any other information that you have to support your report.

3. HOW WILL MY CONCERN BE INVESTIGATED?

Telenet will promptly investigate any report of a concern. All reports made through the aforementioned whistleblower channels will be processed by the Telenet Compliance team and will be allocated to the proper department for further investigation based on the nature of the report. The investigation team will be bound by a duty of confidentiality. The Compliance team will keep the Chair of the ARC periodically informed about the status and outcome of the investigation. These periodic updates will be anonymized.

The whistleblower report may require different investigation steps. For all investigations we will:

- follow a fair process;
- conduct it as quickly as circumstances allow;
- determine whether there is enough evidence to support the matters reported; and
- perform it independently of the person(s) concerned with the allegations.

Telenet will provide you with feedback, as appropriate, on the progress and expected timeframes of the investigation according to the whistleblower's preferred method of communication. You will receive an acknowledgement of receipt within 7 days.

If further information is needed to conduct the analysis the investigation team will contact you. Further feedback on the investigation will be provided within a reasonable timeframe (at least within 3 months). In case of an anonymous report, the Compliance team will use the chat function of Whispli to inform the reporter of the investigation.

4. PROTECTION AND SUPPORT

4.1 CONFIDENTIALITY

Reports of breaches will be kept confidential unless required by law, consistent with our company's need to investigate and take action within the limits as defined by applicable laws and regulations. All employees who contribute to an investigation are instructed to maintain confidentiality regarding such matters and to fully cooperate with the investigation.

Telenet is committed to protecting the privacy of the people involved to the fullest extent possible and in accordance with applicable laws. Our privacy policy sets out how we handle, use and share your personal information.



The Compliance team takes appropriate security measures to protect and store your data against unauthorized access. Furthermore, the information will not be kept for longer than necessary to achieve the purpose for which it was collected and will be deleted in line with the applicable data retention requirements.

4.2 RETALIATION

Telenet will not tolerate any (threat of) retaliation against anyone who, in good faith, reports, complains of, or seeks advice concerning illegal or unethical conduct, or any people who are involved in an investigation of a whistleblower report.

4.3 FALSE OR MISLEADING DISCLOSURES

If someone makes a false report of an infringement or of questionable behavior for the purpose of harming another person or the Telenet Group, the whistleblower may be subject to legal consequences.

5. REFERENCES TO OTHER DOCUMENTS

Code of Conduct

Our Code of Conduct defines how we act as individuals and how we interact with our colleagues, our customers, our business partners and with our broader stakeholder community. It lays the foundation for a strong company culture that responds to the highest standards of respect, business integrity and ethical conduct.

Supplier Code of Conduct

The Telenet Supplier Code of Conduct sets out our ambition and expectation to be a responsible company and to work accordingly with our suppliers.

Privacy Policy

We are responsible for the collection and use of your personal data, and we protect it with due care. We determine what data we collect and use, how we do this, and why. This policy aims to inform you exactly what your rights are and how we handle personal data with care and responsibility, and in accordance with the applicable laws and regulations.

Anti-Corruption Policy

As a company we need to comply with all applicable anti-corruption laws and conduct our business in a manner that avoids the appearance of impropriety. Allegations of corruption can do serious damage to our business and reputation. This Policy describes the guidelines that Telenet employees must follow in order to be compliant with anti-corruption and bribery laws.