



Whistleblower Protection Program

Effective Date: November 20th, 2024

Review Date: November 20th, 2024

1. Purpose

The purpose of this program is to establish a transparent and secure process for employees, contractors, and stakeholders to report suspected wrongdoing while ensuring the highest level of protection for whistleblowers against retaliation. This program aligns with the EU Whistleblower Directive (Directive (EU) 2019/1937) and Dutch implementation laws.

2. Scope

The program applies to all employees, contractors, suppliers, and stakeholders interacting with Jawa Corporate Real Estate Solutions B.V. It covers the reporting of:

- Fraud or financial misconduct.
- Breaches of legal obligations.
- Health, safety, or environmental risks.
- Violations of company policies or ethical standards.
- Any other activity that undermines public interest or corporate compliance.

3. Reporting Channels

Jawa provides multiple secure and confidential channels for reporting:

1. Internal Reporting:

- **Email:** whistleblower@jawa-solutions.nl
- **Phone:** +31-6-22243838 (confidential hotline).
- **In-Person:** Reports can be submitted directly to the Compliance Officer.

2. External Reporting:

If internal reporting feels unsafe or ineffective, whistleblowers may contact relevant authorities such as:

- **House for Whistleblowers (Huis voor Klokkeluiders):**
<https://www.huisvoorklokkeluiders.nl/>.

4. Whistleblower Rights and Protections

- **Confidentiality:** All reports will be treated confidentially. The identity of the whistleblower will not be disclosed without explicit consent, except to relevant authorities if legally required.
- **Non-Retaliation:** Retaliation against whistleblowers is strictly prohibited, including:
 - Dismissal or suspension.
 - Demotion or withholding promotions.
 - Intimidation or harassment.
- **Legal Protection:** Whistleblowers are protected under the Dutch Whistleblowers Authority Act and EU Directive (EU) 2019/1937.

5. Investigation Process

- **Acknowledgment:** Reports will be acknowledged within seven (7) business days.
- **Preliminary Review:** Initial assessment to determine the credibility and materiality of the report.
- **Investigation:**
 - Led by an impartial investigator appointed by Jawa's Compliance Office.
 - Findings will be reviewed within a maximum of three (3) months from the acknowledgment of the report.
- **Outcome and Follow-Up:**
 - Corrective actions will be implemented, if necessary.
 - Whistleblowers will be informed of the outcome, subject to confidentiality constraints.

6. Training and Awareness

- Regular training for employees on whistleblower rights and reporting mechanisms.
- Awareness campaigns to foster an open and ethical workplace culture.

7. Review and Updates

- This program will be reviewed annually to ensure compliance with legal and regulatory changes and to maintain its effectiveness.
- **Contact Information for Questions or Assistance:**
 - Compliance Officer: compliance@jawacres.com
 - Postal Address: Jawa Corporate Real Estate Solutions B.V., Karmelitessenlaan 23, 6816 PK Arnhem, The Netherlands.

Conclusion

At Jawa Corporate Real Estate Solutions B.V., we are committed to maintaining a culture of ethics, integrity, and transparency. This policy provides clear guidelines to ensure that we maintain the highest standards of professional conduct in our business relationships and daily operations.



Jeroen Lubbers
Managing Director
Jawa Corporate Real Estate Solutions B.V.

Date: November 10th, 2024

Place: Arnhem, The Netherlands