



Whistle Blowing Policy

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Biotalys NV
Buchtenstraat 11, 9051 Sint-Denijs Westrem, Belgium
www.biotalys.com

1. INTRODUCTION

Biotalys NV (Buchtenstraat 11, 9051 Sint-Denijs-Westrem (Belgium), company number: 0508.931.185 (RPM Ghent)) (“**Biotalys**” or the “**Company**”) and its subsidiaries from time to time (the “**Biotalys Group**”) is committed to high ethical standards in its dealings with all those with whom it is involved. Our reputation for honesty and integrity is an invaluable asset. We believe that the true measure of our success is not just the results we achieve, but how we achieve them. An important element of this is the commitment to an open culture where people feel secure in seeking advice and raising concerns.

Even though you do not have an obligation to do so, we encourage you to speak up when you know or suspect that there has been a breach of applicable laws or regulations, Biotalys’ Code of Business Conduct or other Company policies, or where there has been a significant ethical lapse. This concerns breaches or significant ethical lapses which could not (or no longer) be processed by the normal reporting line.

It may seem easier to keep silent or look the other way, but by speaking up, you could provide the Company with otherwise hidden information about illegal or unethical behaviour that may introduce severe risks to our Company. Reporting does not necessarily have to involve wrongdoing around a specific bad actor but can entail reporting about a practice or procedure that you feel is inappropriate. We should all take steps to protect the Company from these risks.

In order to enable our colleagues and others to report their concerns through a safe and reliable means, the Group has implemented this policy (the “**Whistle Blowing Policy**” or “**Policy**”), which outlines detailed procedures regarding the Company’s receipt, retention, and treatment of whistleblower reports. Subject to applicable laws, colleagues and others can submit whistleblower reports anonymously (meaning that the identity of the reporter will not be known by anyone) and confidentially (meaning that the identities disclosed and the reports received will only be known by a limited number of people – these who have a need to know for the investigation or remedial actions or under applicable laws). Individuals who make reports in good faith will be free from any retaliation or victimization for making the report.

The Policy applies to any employees or contractors engaged by Biotalys. However, certain provisions outlined in this Policy are only applicable to certain colleagues, as specified in the Policy.

2. HOW CAN REPORTS BE MADE?

2.1. What channels can be used?

You can report your concerns to the Compliance Officer (Piet Bevernage), via email at: piet.bevernage@avh.be. The whistleblower must in any case:

- have reasonable ground for filing a report;
- not base his/her report on rumours; and
- ensure the report contains sufficiently precise information.

Nothing in this Policy in any way prohibits or is intended to restrict or impede colleagues from exercising protected rights or otherwise disclosing information to law enforcement agencies, regulatory, or administrative agencies as permitted by law.

2.2. No retaliation

Biotalys prohibits and will not tolerate any threatened or actual retaliation against any persons, or their legitimate representatives, who, in good faith, (i) raise concerns, (ii) formally or informally report to Biotalys, (iii) assist another colleague to report to Biotalys, or (iv) participate in any investigation or legally protected litigation regarding a report made under this Policy.

Prohibited retaliation or victimization includes, but is not limited to, any form of adverse employment action, demotion, suspension, discipline, threats, intimidation or harassment.

Retaliation is reportable under this policy itself, which will result, where applicable, in disciplinary action, up to and including termination of employment. If you have been subject to any conduct that you believe constitutes retaliation, please immediately report the alleged retaliation following the guidance of this Policy.

This Policy does not excuse colleagues from the consequences of their own misconduct. For example, a colleague who makes a whistleblower report could still face, where applicable, disciplinary action for unrelated misconduct. Similarly, a colleague who self-reports misconduct can still be disciplined for the misconduct she or he has engaged in, where applicable.

This Policy also does not exempt colleagues who report under this Policy from regular performance review.

In addition, a party who knowingly and intentionally files a false report or provides false or deliberately misleading information in connection with an investigation of a report may face, where applicable, disciplinary action, up to and including termination of employment or other legal proceedings.

Similarly, any Biotalys colleagues who discourages or prevents another either from making such a report or seeking the help or assistance she or he needs to make such a report could be, where applicable, subject to disciplinary action.

Subject to applicable laws, reports and investigations are confidential and can be made anonymously.

Confidentiality

As a general rule, the Company will strive to maintain the confidentiality of the identity of the whistleblowers or other individuals who provide information in the course of an investigation. Disclosure will only be made in certain circumstances to facilitate the investigation, take remedial action, or comply with applicable laws or regulations.

In addition, the whistleblower is also bound by a confidentiality obligation at the time of the filing of the report and during the investigation.

Anonymous reports

Subject to applicable laws and regulations, when using one of the reporting channels described in this policy, you are encouraged to identify yourself. However, anonymous reports can be made, subject to applicable laws and regulations.

Making a report anonymously may affect that whistleblower's ability to receive feedback on the status of any investigation, if any, and may affect our ability to investigate the matter or offer protection to the whistleblower. Anonymous whistleblowers are particularly encouraged to provide as much information and evidence as possible.

3. HOW DO WE TREAT WHISTLEBLOWER REPORTS?

All reports made under this policy will be taken seriously and will be promptly and thoroughly investigated by the Compliance Officer.

The specific action taken in any particular case depends on the nature and gravity of the conduct or circumstances reported and the results of the investigation. If misconduct has been confirmed through an investigation, the Company will take prompt and appropriate remedial action proportionate to the seriousness of the misconduct, in accordance with its established procedures and practices. Such remedial action may include, where applicable, disciplinary action against the accused party, up to and including termination of employment. Reasonable and necessary steps will also be taken to prevent any further occurrence of misconduct.

All colleagues are expected to cooperate fully and honestly with any internal investigation. Any colleague who fails to cooperate (e.g. by not providing complete and truthful information or intentionally provides misleading information) will be subject to disciplinary action, where applicable.

When possible and when determined appropriate, notice of the status of the investigation may be provided to the whistleblower. Given the sensitive nature of many investigations arising from whistleblower reports and certain limitations under applicable laws, we cannot commit to providing whistleblowers with any update or the outcome of an investigation. Specific information will be provided on a case by case basis.

To the extent allowed or required by applicable laws, information reported may be communicated to public bodies or authorities competent for the prosecution of crimes. In doing so, the Company will strive to maintain the confidentiality of the identity of the whistleblower.

The Compliance Officer will make periodic report to the Audit Committee on whistleblower reports received.

4. LEGAL COMPLIANCE

This Policy seeks to establish guidelines in consideration of applicable local laws. If any part of this Policy conflicts with applicable local laws (such as applicable data protection, employment and criminal laws), such applicable local laws must be followed.

In circumstances when there is a question as to whether this Policy can be followed, or whether there is a conflict between applicable local laws and this Policy, colleagues must seek guidance from the Compliance Officer before taking action.

5. DATA PRIVACY

Biotalys may collect, process and store personal data of the whistleblower and any other individuals concerned by a particular whistleblowing report, in accordance with applicable laws relating to data protection and whistleblower protection if any. With regards to Biotalys' employees, such collection,

processing and storage will take place in accordance with the employee data protection notice which can be found in the work rules. With regards to contractors, such collection, processing and storage will take place in accordance with the data protection notice which can be found here <https://www.biotalys.com/privacy-policy>.

To the extent it is required that additional information be provided to individuals affected by a particular whistleblowing procedure under applicable laws, the Company will comply with such requirements. However, in doing so, the Company may defer the provision of specific information to certain individuals in accordance with applicable laws. The Company will also strive to maintain confidentiality of the whistleblower to the extent applicable laws permit.