



Sligro Food Group N.V.

WHISTLEBLOWER SCHEME

Approved and adopted by the Supervisory Board and Executive Board on 20 July 2020 and revised on 21 October 2024.

1. DEFINITIONS

The terms below have the following meaning in the context of this whistleblower scheme:

Compliance Officer: the Company Secretary;

Executive Board: the statutory directors of Sligro Food Group N.V.;

Manager: an Employee's immediate manager;

Reporting Person: a natural person who, in the context of their work-related activities, reports or exposes Misconduct or Suspected Misconduct;

Report: a report of suspected misconduct;

Employee: any person bound by an employment contract under civil law who carries out work for Sligro Food Group, or any other person who carries out work for Sligro Food Group in exchange for payment in the context of a working hierarchical relationship, including agency staff, as well as persons who work for Sligro Food Group on an interim basis;

Works Council: The Works Council of a subsidiary of Sligro Food Group N.V.;

Misconduct: a. a violation or the risk of violation of EU law (that involves an act or omission in areas where strict adherence to legislation is required, including public health, data protection or protection of personal lives), or b. an act or omission that adversely affects public interests in case of:
1. a violation or risk of violation of a statutory regulation or of internal rules that impose a specific obligation and have been established by Sligro Food Group on the basis of a statutory provision; or 2. a risk to public health, public safety or the environment, or an improper act or omission that jeopardises the proper functioning of public services or an enterprise. A public interest is in any event at stake if the act or omission affects more than just personal interests and is either part of a pattern or structural in nature, or is serious or broad in scope;

Suspected Misconduct: the Reporting Person's suspicion that Misconduct has taken place or is taking place in the organisation at which they work or have worked, or in another organisation if they have come into contact with that organisation through their work, where the suspicion is based on reasonable grounds resulting from knowledge gained by the Reporting Person while working for Sligro Food Group or resulting from knowledge gained by the Reporting Person through their work at another business or organisation;

Scheme: this whistleblower scheme;

Supervisory Board: the Supervisory Board of Sligro Food Group N.V.;

Sligro Food Group: Sligro Food Group N.V. and its subsidiaries;
WBK: *Wet Bescherming Klokkenuiders* (Whistleblower Protection Act).

2. OBJECTIVE

2.1. Position of and trust in Sligro Food Group

Sligro Food Group has an important position in society and our Employees are our face to the outside world. Apart from the commercial performance of our outlets, Sligro Food Group's success depends on the trust of those around us, both inside and outside the organisation. Trust can only be gained by acting professionally and with integrity.

2.2. Compliance with legislation and regulations by Sligro Food Group

Sligro Food Group is aware of its social responsibilities, and as such we aim not just to comply as far as possible with applicable legislation and rules and the Dutch Corporate Governance Code, but also to respect generally accepted standards and values. We have set out our standards and values in a code of conduct that applies to all Employees.

Sligro Food Group has a single uniform whistleblower scheme that applies to all our Dutch and foreign subsidiaries. The Scheme complies with the Dutch Corporate Governance Code and internationally accepted standards in this area.

3. REPORTING SUSPECTED MISCONDUCT

3.1. Reporting

All persons who are in a working relationship with Sligro Food Group are requested to immediately report Misconduct or Suspected Misconduct to the Compliance Officer as described below in section 4.

3.2. Suspected Misconduct

Suspected Misconduct includes in any event:

- a. an actual or imminent infringement of legislation or regulations (including committing criminal acts such as theft or fraud);
- b. an actual or imminent infringement of the code of conduct or other guidelines in force at Sligro Food Group;
- c. actual or imminent deliberate misinforming of public bodies by or on behalf of Sligro Food Group;
- d. an actual or imminent threat to the health or safety of the public or Employees;
- e. an actual or imminent deficiency in bookkeeping, internal control systems or financial reporting;
- f. actual or imminent abuse of authority;
- g. any other actual or imminent conduct that may lead to material damage to Sligro Food Group's reputation or financial situation;
- h. an actual or imminent environmental infringement;
- i. actual or imminent bribery;

- j. actual or imminent deliberate deception of Sligro Food Group or a third party for personal gain;
- k. actual or imminent misuse or incorrect use of operating assets;
- l. an actual or imminent failure to comply with obligations in relation to data breaches and/or personal data;
- m. actual or imminent deliberate withholding, destruction or manipulation of information or facts relating to irregularities covered by a. to l.

3.3. Open communication between Employees and Managers

None of the above should discourage open communication between Employees and Managers. All Employees and Managers are requested to discuss openly any areas of concern that do not immediately qualify as Misconduct or Suspected Misconduct so that – to the extent that this is desirable – appropriate action can be taken as required.

3.4 Advice

Employees may consult the Compliance Officer in confidence about Misconduct or Suspected Misconduct. Employees may also obtain confidential advice externally, provided that confidentiality as set out in section 6.4 is ensured. The cost of the external advice is payable by the person who commissioned it, unless other arrangements have been made in writing between the Employee and Sligro Food Group before the advice is sought.

4. METHOD AND CONTENT OF REPORT

4.1. Basis: (confidential) report to the Compliance Officer

If any Reporting Person reasonably believes that Misconduct or Suspected Misconduct has occurred, is occurring or will occur, they are asked to report it directly and openly to the Compliance Officer.

Reports may be submitted either openly or anonymously as follows: (a) online at <https://sfg.integrity.complylog.com/>, (b) in writing, (c) verbally by phone or other voice communication systems, or (d) on request, during a conversation held in person within a reasonable period of time.

The Compliance Officer's contact details can be found in the Corporate Governance section on the www.sligrofoodgroup.nl website. Reports should be properly motivated and accompanied by any available documentation. If desired, a report of Suspected Misconduct may be discussed with the Compliance Officer before it is submitted.

An anonymous report may hinder or complicate the investigation such that appropriate steps cannot be taken. Consequently, Reporting Persons are asked to make a report anonymously only in exceptional circumstances. Please see the provisions on confidentiality in section 6.4 for more information.

4.2. Exceptions: report to the chair of the Executive Board or the chair of the Supervisory Board

Irrespective of section 4.1, if the Misconduct or Suspected Misconduct involves an act or omission of the Compliance Officer, the Employee should report it to the chair of the Executive Board (CEO). In this context, an omission includes a refusal to investigate a particular report. Irrespective of section

4.1, if the Misconduct or Suspected Misconduct involves an act or omission of the Executive Board or one of its members, including in situations where these members act in the capacity of director of a subsidiary, the Reporting Person should report it to the chair of the Supervisory Board. In this context, an omission includes a refusal to investigate a particular report.

4.3 Content of the report

To ensure that Sligro Food Group is able to investigate and respond effectively, the report should contain as much specific information as possible, including information about the person(s) involved, any witnesses, the location and other information that could assist Sligro Food Group in investigating the Suspected Misconduct.

4.4. Reporting Misconduct or Suspected Misconduct outside Sligro Food Group

The internal reporting procedure as described in subsections 1 and 2 of this section should preferably be followed. However, the WBK permits immediate external reporting to a competent authority as described in section 2c of the WBK.

5. CONSEQUENCES OF A REPORT

5.1. Protection

A Reporting Person will not be put at any disadvantage or threatened with being put at a disadvantage as a result of submitting a report, provided that the Reporting Person has reasonable grounds to assume that the reported information is correct at the time of the Report. Being put at a disadvantage includes, but is not limited to, being dismissed, demoted, suspended, threatened or disadvantaged in their employment conditions or legal status, or being subject to any other reprisal, as a result of submitting a Report. If a Reporting Person has derived or will derive any personal benefit from the Misconduct or Suspected Misconduct, the Executive Board will consider this and may take measures against that Reporting Person.

5.2. Active prevention of threats or reprisals by Sligro Food Group

Sligro Food Group will not tolerate threats, reprisals or other actions against a Reporting Person who has made a report based on a reasonable suspicion. If such threats, reprisals or actions nevertheless arise, the Reporting Person should report this immediately to the Compliance Officer.

5.3. False reports

Sligro Food Group will not tolerate a Reporting Person making a report of Misconduct or Suspected Misconduct that they know or reasonably ought to know is false. Submitting a false report may have adverse employment consequences or other consequences for that Reporting Person, who, furthermore, may be held liable for damage suffered or to be suffered by Sligro Food Group or a person affected by the false report.

6. OBLIGATIONS OF SLIGRO FOOD GROUP

6.1. Period for dealing with a report

Sligro Food Group will record and respond to a report of Misconduct or Suspected Misconduct seriously, confidentially and with the appropriate urgency. The Reporting Person will receive confirmation of receipt of a report within seven days of receipt and will be informed about the

results of the assessment and, to the extent applicable, of the steps taken in response to the report within a reasonable period not exceeding three months from the date on which the confirmation of receipt was sent.

6.2. Third-party investigation

Suspected fraud or theft and questionable bookkeeping practices will be investigated by qualified persons appointed by the Executive Board or Supervisory Board, depending on the nature and content of the reported Misconduct or Suspected Misconduct.

6.3. Co-operation by Sligro Food Group

Sligro Food Group is obliged to co-operate fully and assist those investigating the accuracy of a report and all those appointed in that context.

6.4. Confidentiality and privacy

All persons involved in a Report or an investigation of Misconduct or Suspected Misconduct who are given access to data that they are aware is confidential, or should reasonably suspect to be confidential, are obliged to treat that data confidentially, except to the extent that statutory provisions oblige them to share it or if it is necessary to share it in the context of their contribution to the implementation of the WBK.

Sligro Food Group will treat all reports of Misconduct or Suspected Misconduct confidentially and will fulfil its duty of care. Without the consent of the Reporting Person, Sligro Food Group will not publicise direct or indirect information about the identity of the Reporting Person, unless obliged to by a statutory provision. If this is the case, Sligro Food Group will inform the Reporting Person as soon as possible in advance, unless that information could prejudice the related investigation or the judicial procedure. Sligro Food Group will, in this regard, comply with the provisions of the General Data Protection Regulation and the WBK.

6.5. Notification of investigation

If an investigation is started into a person within Sligro Food Group as a result of a report, that person will be notified as soon as reasonably possible and desirable.

7. OTHER

7.1. Approval by the Supervisory Board and consent of the Works Council

This Scheme came into force after approval by the Supervisory Board and with the consent of the Works Council and may be amended from time to time by the Executive Board after consent is obtained from the Works Council and Supervisory Board.

In principle, this Scheme is valid for an indefinite period unless the Executive Board concludes that it should be amended or terminated following an evaluation.

7.2. Deviations

The Compliance Officer, Executive Board or Supervisory Board may on occasion decide to deviate from parts of this Scheme if this is reasonably necessary to serve a justified interest of Sligro Food Group.

7.3. Decision by the chair of the Supervisory Board

The decision by the chair of the Supervisory Board is final in the event of uncertainty or a difference of opinion on the meaning of any provision of this Scheme.

7.4. Whistleblowers with Belgian citizenship

For whistleblowers with Belgian citizenship, the protection extends to at least the 14 domains specifically mentioned in the Belgian Whistleblower Protection Act of 28 November 2022.

7.4. (Partial) invalidity

If any provision of this Scheme is or becomes invalid, this will not affect the validity of the remaining provisions. The Executive Board may replace the invalid provisions with valid provisions whose effects are as consistent as possible with the content and objective of the provisions to be replaced.

7.5. Publication on the website

The Scheme will be published on the website of Sligro Food Group.