

Whistleblower Policy

Purpose

Justdiggit is committed to maintaining the highest standards of ethics, integrity, and accountability in all aspects of its operations. At the same time, suspicions of misconduct and violations are taken seriously when they occur. This Whistleblower Policy is established to provide a mechanism for individuals to report concerns, complaints, or instances of wrongdoing, without fear of retaliation.

Scope

This policy applies to all - internal and external - parties involved with Justdiggit. It covers any concerns of 'societal violation', like financial misconduct, ethical violations, legal breaches, mismanagement, harassment, discrimination, safety violations, or any other wrongdoing that may impact Justdiggit's operations or reputation.

If the concern does not meet the explanation above and is therefore unsuited for external reporting, we refer to Justdiggit's *Integrity Policy* and internal reporting mechanism.

External Reporting Mechanism

In case the concern involves a societal violation, it is possible to report the concern to external regulatory bodies or legal authorities. Justdiggit has appointed external independent Whistleblower Officers for receiving and addressing whistleblower reports. Their role is to ensure the confidentiality of the report, assess the concern, initiate investigations if required, and ensure appropriate actions are taken.

- A suggestion for individuals based in The Netherlands: Huis voor Klokkenluiders Contact information to blow the whistle can be found <u>here</u>. Before reaching out to Huis van Klokkenluiders first read <u>this</u> to see if the issue that you want to report meets the definition of societal violation, what the reporting process looks like and what you can expect from this independent reporting line.
- A suggestion for individuals based in countries on the African continent: PPLAAF Contact information to blow the whistle can be found <u>here</u>. Before reaching out to PLLAAF first read <u>this</u> to thoroughly assess your situation and define if the issue that you want to report meets the definition of violation.

Confidentiality and Non-Retaliation

Justdiggit is committed to maintaining the confidentiality of individuals who report concerns. Disclosure of the whistleblower's identity will be limited to those who need to know for the purpose of investigation and resolution.

Retaliation against whistleblowers is strictly prohibited. Justdiggit will take appropriate actions against any individual found to be retaliating against a whistleblower. This may include disciplinary action, up to and including termination of employment or contractual relationship.

False Reporting

Submitting intentionally false or malicious reports is considered a violation of this policy. Individuals found to be making false reports may face disciplinary actions.

Investigation and Resolution

Upon receiving a whistleblower report, the Whistleblower Officer will conduct a thorough and objective investigation. The investigation process will adhere to principles of fairness, integrity, and transparency.

If the concern is found to be substantiated, Justdiggit will take appropriate corrective actions, which may include disciplinary measures, process improvements, training, or other remedial actions.

Documentation

Whistleblower reports, investigations, and actions taken will be documented and maintained in a digital folder giving access to only the CEO, COO and Head of People & Culture. This documentation may be used for future reference, reporting, or legal purposes.

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