

WHISTLEBLOWER POLICY

1. Purpose

LP is committed to acting lawfully, ethically and with integrity. This policy explains how anyone who works with LP can report a genuine concern about wrongdoing, how LP will handle that report, and how LP protects people who report in good faith from retaliation. It reflects the requirements of the EU Whistleblower Directive (Directive (EU) 2019/1937) and the Dutch Whistleblower Protection Act (Wet bescherming klokkenluiders).

2. Who Is Covered

This policy applies to everyone who works for or with LP in a work-related context, including current and former directors, officers and employees (full-time, part-time or temporary), job applicants, interns and trainees (paid or unpaid), volunteers, consultants, contractors, agents, shareholders, and members of the Supervisory Board, as well as staff of LP's suppliers, contractors and subcontractors (together, "LP Associates"). It also protects anyone who helps a person make a report (a "facilitator"), and colleagues, relatives or other third parties connected to the reporter who could be adversely affected because of the report.

3. What You Can Report

Report any genuine concern that LP, or someone acting for LP, has done something — or failed to do something — that is illegal, breaches EU or Dutch law, breaches LP's Code of Conduct or other internal policies, or is otherwise unethical or improper and puts people or the public interest at risk. Examples include fraud or financial misconduct, bribery or corruption, discrimination or harassment, health and safety risks, data protection or confidentiality breaches, and breaches of commitments to sponsors or partners. This policy is not the right channel for a personal workplace grievance that does not involve wrongdoing of this kind; please raise that through LP's normal HR channels instead.

4. Reporting to LP

Report your concern to the Managing Director. If your concern involves the Managing Director, or the Managing Director has a conflict of interest, report it to the Supervisory Board instead. You can report in writing, including by email, or verbally, including by phone or at a face-to-face meeting; if you ask for a meeting, LP will arrange one within a reasonable time. Please report as soon as you reasonably can.

5. Reporting to an External Authority

You do not have to report to LP before reporting externally, although doing so is often the quickest way to resolve a concern. You may also report directly to the Huis voor Klokkenluiders or another competent regulator who may also provide support.

6. Public Disclosure

In limited situations — for example, where there is an imminent or clear danger to the public interest, or you reasonably believe internal or external reporting would not be properly addressed or would expose you to retaliation — making your concern public, including to the media, may also be protected under this policy and the law.

7. Acknowledgement and Follow-Up

LP will acknowledge receipt of your report within seven days, unless you have asked not to be contacted or doing so would risk revealing your identity. LP will then assess and, where appropriate, investigate the concern diligently, proportionately and impartially, using people who are not implicated in the matter reported.

8. Feedback

LP will give you feedback on the outcome, or on the action planned or taken, within three months of the acknowledgement (or within three months of your report if no acknowledgement was sent). If the matter is still open, you may ask for a further update.

9. Records

LP will keep a confidential record of each report and how it was handled, for no longer than necessary and in accordance with data protection law.

10. Your Identity

LP will keep your identity, and that of anyone else named in your report, confidential. It will only be shared with people who need to know it to handle the report properly, unless you agree to wider disclosure or the law or a court requires it. You do not need to identify yourself to make a report. LP will consider anonymous reports and act on them where it can, but not knowing who made a report, or being unable to ask follow-up questions, may limit how far LP can investigate.

11. Personal Data

Any personal data LP collects when handling a report will be processed in line with the GDPR and Dutch data protection law: limited to what is necessary, accessible only to authorised people, and kept only for as long as needed.

12. No Retaliation

LP will not tolerate retaliation, or threats or attempts at retaliation, against anyone who reports in good faith under this policy, or against a facilitator or a connected third party. This includes, for example: dismissal, suspension, demotion or withheld promotion; disciplinary action; changes to duties, hours, location or pay; withheld training; a negative performance review or reference; harassment, intimidation or discrimination; damage to reputation, including online; blacklisting; non-renewal or early termination of a contract; or referral for psychiatric or medical assessment. If you believe you have suffered retaliation because you reported in good faith, LP must show that any action it took was for reasons unrelated to your report.

13. When You Are Protected

You are protected under this policy if, when you reported, you reasonably believed the information was true and that it fell within the scope of this policy — even if you later turn out to be mistaken. Making a report in good faith will not be treated as a breach of any duty of confidentiality, including under a confidentiality or non-disclosure agreement. This protection does not excuse you from responsibility for any wrongdoing of your own that is unrelated to the report, and it does not apply if you knowingly report false information, which may itself lead to disciplinary or legal action.

14. Outcome of an Investigation

If a report is substantiated, LP will take appropriate action, which may include disciplinary measures up to and including termination for cause, and, where appropriate, referral to the relevant authorities.