



APG Regulations on Anonymous Reporting of Wrongdoing (Whistleblower Policy) 2.2

Internal adjustment of the APG Regulations on the Anonymous Reporting of Wrongdoing (Whistleblower Regulations)

Management	GRC
For your information Works Council	
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1. INTRODUCTION

Within APG, there are various regulations or procedures on the basis of which you, as an employee, can report irregularities or undesirable behavior. Think of the Complaints and Objection Procedure, the Fraud Policy or the possibility of calling in the Confidential Advisor in the event of undesirable behaviour. What those regulations or procedures do not provide is the possibility to report suspicions of wrongdoing anonymously. This regulation makes that possible.

1.1 What..... Is the regulation on anonymous reporting of wrongdoing?

APG has established a regulation for the anonymous reporting of suspected wrongdoing. This regulation explains what a suspicion of wrongdoing is and what you can and may expect if you want to report it. It also explains what protection against prejudice you enjoy if your report is qualified as a suspicion of wrongdoing.

The suspicion of wrongdoing is so serious or is so confidential to you that you do not want to discuss it in any other way. Within APG, there are also other ways to report, namely discussing with a colleague or your manager, reporting to the Confidential Advisor, reporting to the fraud coordinator (see intranet), making an objection or submitting a complaint.

1.2 Why.....does APG have a regulation on anonymous reporting of wrongdoing?

In the first place, having a regulation on anonymous reporting of wrongdoing is required by law under the Whistleblower Protection Act (Wbk). This law is the implementation of the EU Whistleblower Directive.

But mandatory or not, APG considers it very important that a suspicion of wrongdoing is reported. Only in this way can wrongdoing be investigated and resolved. And in this way, wrongdoings can be prevented in the future.

Wrongdoing poses a threat to the integrity and reputation of APG and its employees. That is something APG does not want. APG believes it is

important that employees can report a suspicion of wrongdoing in the safest possible way and without fear for their job. That is why APG has opted for an accessible, low-threshold and anonymous hotline for suspected wrongdoing.

This policy applies to APG Groep N.V. and its subsidiaries.

1.3 For whom...Is the regulation on anonymous reporting of wrongdoing available?

The anonymous reporting regulation is for all APG employees and for all other persons who perform work-related activities for or at APG. This includes interns, self-employed persons, but also volunteers, APG's suppliers, the members of the supervisory board and APG's shareholders. The point is that the reporter performs, has performed or will perform work for an organization. A former employee or another person whose working relationship has ended can therefore also be a reporter. Just like job applicants and other people whose working relationship has yet to start. Someone can only be considered a reporter within the meaning of the Wbk if they have a reasonable suspicion of wrongdoing and can substantiate it. This means that there must be concrete and reliable indications for the suspicion of wrongdoing. Reporting something based on rumors or stories from others is not possible.

2. REPORTING

2.1 What can I report?

You can report a suspicion of wrongdoing.

There is a suspicion of wrongdoing:

- 1. If you observe a (risk of) violation of EU law (i.e.: EU law) during your work for or at APG.**

This must concern violations that in your opinion must be known and against which action must be taken and where there is no other option for you than to report this through this regulation.

Examples of violations of EU law are European directives or regulations in the field of:

- public procurement;
- financial services, products and markets, prevention of money laundering and terrorist financing;
- product safety and product compliance;
- transport safety;
- protection of the environment;
- radiation protection and nuclear safety;
- food and feed safety, animal health and welfare;
- public health;
- consumer protection;
- protection of privacy and personal data and security of network and information systems;
- infringements affecting the financial interests of the Union as referred to in Article 325 of the Treaty on the Functioning of the European Union;
- infringements relating to the internal market (as referred to in Article 26(2) of the Treaty on the Functioning of the European Union).

There is also a suspicion of wrongdoing:

- 2. If you observe an act or omission in your work for or at APG that affects the public interest**

The public interest is affected in any case if the situation does not only affect personal interests and there is a pattern or the act/omission is so serious or extensive.

A suspicion of wrongdoing is therefore more than a personal conflict or an individual problem at work. These are cases in which rules are violated that are supposed to protect society or pose risks to society, such as dangerous working conditions or financial deception.

Examples of suspicions of wrongdoing with a social importance are:

- violation of legal rules;
- violation of internal company rules based on a legal obligation (e.g. safety procedures);
- fraud;
- danger to the proper functioning of APG;
- danger to the safety of employees or other persons;
- danger to public health;
- environmental degradation.

2.2 Who can I report to?

You can decide for yourself whether you first want to report the suspicion of wrongdoing internally to APG or whether you want to report it directly externally to one of the authorities designated for this purpose in the Wbk.

It may be in your interest and that of APG to first report a suspicion of wrongdoing to APG. APG can then take measures to stop and/or undo the wrongdoing. In the case of direct external reporting, this internal investigation option is lacking.

If you first report internally and you later feel that the report has not been handled to your satisfaction, you can always report to the external authority.

If you feel safer reporting directly to an authority designated for this purpose in the Wbk, that is your free choice.

For reporting wrongdoing with a social interest, the external authority is the House for Whistleblowers.

For the purpose of reporting a breach or risk of breach of EU law, depending on the nature of EU law, the competent external authorities are:

- the Netherlands Authority for Consumers and Markets (ACM) in the event of violations of consumer law;
- the Dutch Data Protection Authority (DPA) in the event of violations of the General Data Protection Regulation (GDPR);
- de Nederlandsche Bank N.V. (DNB) and the Netherlands Authority for the Financial Markets (AFM) in the event of violations of financial and economic rules;
- the Health and Youth Care Inspectorate in the event of public health violations;
- the Dutch Healthcare Authority in the event of violations of the healthcare market;
- the Authority for Nuclear Safety and Radiation Protection in the event of violations of nuclear safety.

2.3 How do I report to APG?

You report a suspicion of wrongdoing within APG anonymously to and through an external party: SpeakUp. This specialized and certified company is hired by APG to facilitate reports. This company protects the privacy and anonymity of the reporter and the interests of APG. For more information about SpeakUp, see: <https://www.speakup.com>

Both internal employees and people who are going to perform or have performed work can make a report. To report to APG, follow the steps below:

- Use the URL: (<https://apg.speakup.report/APG>). You will then be taken to the APG SpeakUp Line Web Service. This is a protected, APG company-specific internet environment on the SpeakUp website. You can also use a QR code:



- When you submit a report, you will be asked to create a password. A unique registration number of the report will also be shown that

you should keep. The next time you log in, enter your password and the registration number. You can then make your report and attach documents if necessary.

- The report is completely anonymous. You don't need to provide a name or contact information.
- The internal APG Reporting Officer receives your report and communicates with you via SpeakUp.
- If you want to explain your report in more detail in person or via a meeting on location, you can make this known at the time of the report or later during the course of the investigation. In those situations, your name and contact details will be known to the Reporting Officer and your report will no longer be anonymous. The handling of your report remains confidential.
- Would you rather report verbally? Then you can also contact the Reporting Officer directly. Your report is then not anonymous, but remains confidential.

Your report will be treated confidentially throughout the process. Reporting is therefore done anonymously. A report number will be linked to your report and not your name. Your name will only be known if you want it to.

Anyone involved in the report or investigation of suspected wrongdoing is obliged to maintain the confidentiality of the information and data that become known during the report or investigation.

2.4 Who will handle my report?

Your anonymous report will be sent to the Reporting Officer via the SpeakUp web service. The Reporting Officer is the Integrity Officer of APG Group's Group Compliance. The deputies are the Chief Compliance Officer of APG Group and the Director Group Risk & Compliance. The Reporting Officer and the deputies are the only APG officers who, if you have indicated this in your report, know your name and contact details. Unless you want your name and contact details to be known to other officials as well.

The Reporting Officer reads your report and, if necessary, asks additional questions via SpeakUp. It

may happen that a report does not qualify as a suspicion of wrongdoing, or only contains elements of a whistleblower report. For example, when the violation of internal rules is not of a structural nature, only affects a personal interest or that the public interest is not at stake. Examples include a labor dispute or a report about a misplaced comment by a colleague. The Reporting Officer may then decide to handle the report anonymously, but the protection rights for a whistleblower (see section 3 below) do not apply. The Reporting Officer informs the reporter of the decision as soon as possible and then, with the approval of the reporter, starts the investigation.

The Board of Directors gives the Reporting Officer the opportunity to conduct an independent investigation. The Reporting Officer (or the deputies) may take all measures or request information necessary for the investigation. Everyone who is asked for cooperation is obliged to cooperate.

You may consult a confidential advisor (within APG) about a suspicion of wrongdoing. You are free to choose that advisor. The confidential adviser is bound by confidentiality. You can also contact the Advice Department of the House for Whistleblowers: (<https://www.huisvoorklokkenluiders.nl/ik-vermoed-een-misstand>).

2.5 How does my report work?

With your report number and password, you can log in via the aforementioned URL (<https://apg.speakup.report/APG>).

During the investigation, you and the Reporting Officer communicate with each other via the SpeakUp website. Sometimes there are ambiguities or questions that require the Reporting Officer to provide additional information for the investigation. Documents can also be uploaded during the investigation. It is therefore important to continue to follow your report. Communication is completely anonymous, unless you want the Reporting Officer to know your identity.

The Reporting Officer will inform you about the handling and follow-up of your report. For example, you will receive:

- a confirmation of receipt within 7 days of your report;
- information as soon as possible about whether your report, or which elements of your report, qualify as a whistleblower report (see section 2);
- information about the assessment or follow-up of your report as soon as possible, but no later than 3 months after the confirmation of receipt;
- After completion of the investigation, you will be informed about the handling of your report.

The Reporting Officer informs the Chair of the Integrity Committee and the Chief Compliance Officer, unless the report relates to one of them. If the report concerns the chair of the Integrity Committee, the chair of the Supervisory Board and the Chief Compliance Officer will be informed. If the report is about the Chief Compliance Officer, only the chair of the Integrity Committee will be informed. The Reporting Officer does not pass on any personal information of the reporter. If your report relates to the Reporting Officer, you can ask the House for Whistleblowers for advice and support. (<https://www.huisvoorklokkenluiders.nl/ik-vermoed-een-misstand>).

2.6 Can I withdraw my report?

If you want, you can always withdraw your report. If you believe that pressure is being exerted on you to withdraw your report, you must report this. You do this in the same way as reporting a suspicion of wrongdoing.

2.7 How long will my report be kept?

SpeakUp deletes the data from the report 3 months after completion of the process. The Reporting Officer will delete the investigation file 5 years after your report has been handled or withdrawn, in accordance with the Whistleblower Protection Act.

2.8 When do I report to the House for Whistleblowers?

You can also report a suspicion of wrongdoing with a social interest to the House for Whistleblowers (<https://www.huisvoorklokkenluiders.nl/onderzoek-door-het-huis>).

You can do this immediately or after your report has been handled by APG.

Whether and when you report is up to you if:

- you think that APG has not handled your report properly;
- you did not have a good feeling about the settlement;
- you think it is better or safer to report it directly to the House for Whistleblowers.

If you are unsure whether there has been wrongdoing or you do not know what to do, you can ask the House for Whistleblowers for information, advice and support (<https://www.huisvoorklokkenluiders.nl/ik-vermoed-een-misstand>).

The House for Whistleblowers does not disclose your identity to APG. This only happens if you agree to this.

2.9 When do I report to another authority?

You can also report a breach or risk of breach of EU law to the competent authority for the area of EU law to which the breach relates.

You can do this immediately or after your report has been handled by APG.

Whether and when you report is up to you if:

- you think that APG has not handled your report properly;
- you did not have a good feeling about the settlement;
- to you it seems better or safer to report it directly to the competent authority.

3. PROTECTION

3.1 Does reporting a suspicion of wrongdoing have adverse consequences for me?

If you report in good faith, reporting a suspicion of wrongdoing may not have any adverse consequences for you or your legal position. You may not be fired or disadvantaged for this. The Civil Code states that your employer may not disadvantage you in any way because of reporting a suspicion of wrongdoing.

APG will refrain from any form of disadvantage, including bullying, intimidation or withholding promotion. Not only to you, but also to your confidential advisor or other people who assist you.

Even threatening or attempting to disadvantage is not allowed.

If all this does occur, you can turn to the House for Whistleblowers (<https://www.huisvoorklokkenluiders.nl/onderzoek-door-het-huis>).

It is up to APG to demonstrate that no adverse measures have been taken against you.

You can also start civil proceedings if you would have been dismissed or otherwise disadvantaged.

More information:

- European Whistleblower Protection Directive
- Whistleblower Protection Act
- House for Whistleblowers website
- Websites other authorities