

Appendix M: Raise your voice

In this document the reference to “Neways” is to be read as Neways Electronics International N.V. and/or its affiliated companies.

Raising your voice is essential to sustain our reputation and internal Neways DNA values, both now and in the future. Therefore we encourage you, as an employee, to raise your voice if you believe that you discover something in conflict with the Code of Conduct and our values.

This Policy is applicable to all employees of Neways. If you notice something that you believe is in conflict with the Code of Conduct, we encourage you to first talk to your direct manager about it. If that is not appropriate or if it does not resolve the issue, you can talk to your local HR manager or to the HR manager of another Neways Operating Company. Does this still not resolve the issue, please contact the Corporate Head of HR who is appointed as compliance officer for this Code of Conduct. In case the concern or complaint you want to raise involves your direct manager please contact the next level as mentioned above.

Neways encourages you to raise concerns internally through one of the available channels, see the [raise your voice flowchart](#).

By raising your concern internally, Neways investigates your concern and takes appropriate action if necessary and gives support if needed.

No Misuse

We will not tolerate the abuse or misuse of the Policy for other means than the objectives set forth in this Policy. Any such misuse can lead to disciplinary actions. More specifically, Neways will not tolerate the use of this Policy for personal defamation, openly wrongful and malicious allegations, etc.

Which cases are COVERED?

This Policy covers any good faith complaint or concern with respect to Neways, of any Neways employee or any other person (such as a Neways supplier, customer, shareholder or other stakeholder), in connection with:

- (i) questionable accounting, internal accounting controls, or auditing matters;
- (ii) a potential violation of the Code of Conduct and related policies;
- (iii) a potential violation of any law or regulation;

- (iv) a potential criminal offense;
- (v) a potential (sexual) harassment;
- (vi) a potential provision of incorrect information to public bodies or authorities;
- (vii) fraud or deliberate error in the preparation, evaluation, review or audit of any financial statement of Neways or in the recording and maintaining of financial records of Neways;
- (viii) misrepresentation or false statements to or by a senior officer or accountant regarding a matter contained in the financial records, financial reports or audit reports;
- (ix) deviation from full and fair reporting of Neways' financial condition;
- (x) a potential suppression, destruction or manipulation of information regarding any of the foregoing circumstances; or
- (xi) any other irregularities of a general, operational or financial nature (e.g. danger for public health, safety of persons).

RETENTION OF DOCUMENTS

All written complaints and concerns submitted by an employee or other person regarding an alleged violation of the Code of Conduct or any matter covered by this Policy, along with any investigational materials and other documentation relating thereto, shall be retained by Neways for two years.

NO RETALIATION

No member of the Supervisory Board, Board of Directors, General Management, or employee who in good faith reports a violation of the Code of Conduct or reports a complaint or concern involving matters covered by this Policy shall suffer harassment, retaliation or adverse employment consequence as a result of such report. An employee that retaliates against someone who has reported a violation, complaint or concern in good faith is subject to discipline up to and including termination of employment. This Policy is intended to encourage and enable employees and others to raise concerns within Neways and to better enable Neways to promote compliance with the Code of Conduct and related policies. In the event an employee files a complaint which such employee knows or reasonably should know to be false, such employee will be subject to disciplinary action such as termination of employment and such employee may be held liable for damages incurred by Neways.

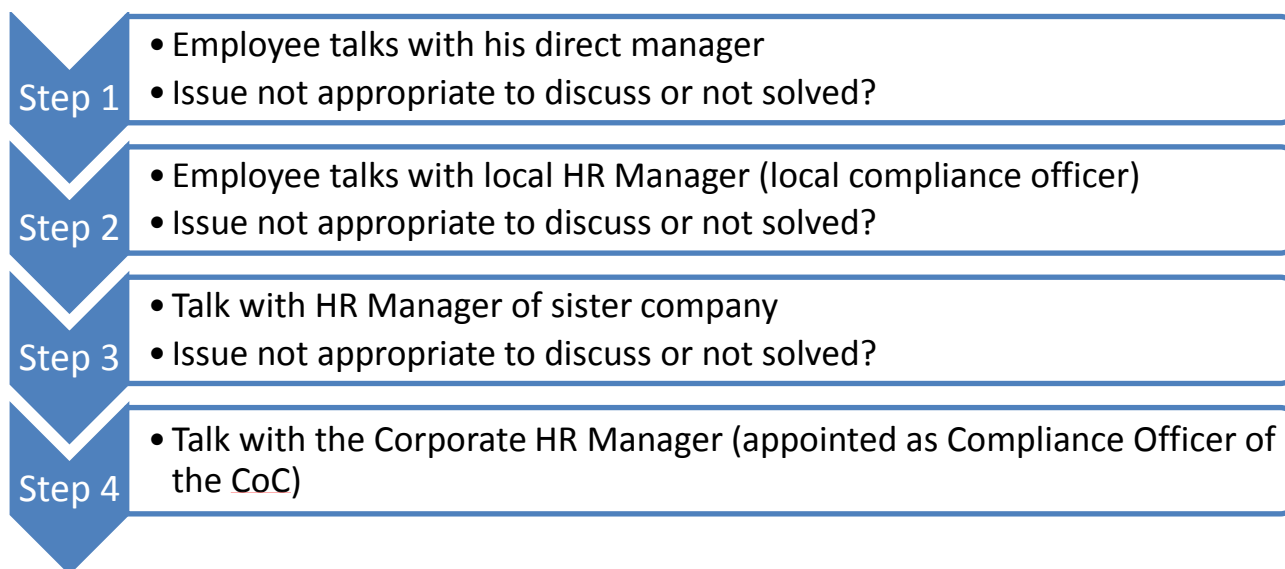
PRIVACY

The privacy of all personal data involved will be processed in accordance with the latest Neways internal privacy policy, as published on the Neways intranet.

REPORTING PROCEDURE: RAISE YOUR VOICE flow chart

Neways has a procedure for reporting issues with respect to the Code of Conduct, including complaints of a financial nature. Reporting can be done without repercussions if done in good faith. You may send an (anonymous) communication to the Compliance Officer at Neways.

How to raise your voice in case of a potential violation of the Code of Conduct?



Note: Neways employees based in the Netherlands can as per the Dutch law "Wet Huis voor Klokkeluiders" additionally (if above procedure is not sufficient or appropriate) report via the Neways 'Klokkeluidersregeling' which is available on the Neways intranet.

CHANGES

This Policy can be amended from time to time so please check regularly the latest version of this Policy on the Neways intranet.