



Jumbo's Whistleblower Policy

(28 Feb 2025, Version 1)

This Whistleblower Policy ("Policy") underlines Jumbo's commitment to fostering a culture of transparency, accountability and ethical conduct. It encourages and protects all individuals associated with Jumbo, including employees, former employees, freelancers, interns, consultants, shareholders and business partners (e.g. clients, contractors, subcontractors and suppliers) ("Whistleblowers") who report inappropriate or unethical behaviour by or within Jumbo.

This Policy provides clear guidelines for the careful and proportionate handling of complaints to ensure timely, appropriate and lawful responses to concerns. It is in line with Jumbo's 'Speaking Up' culture as described in Jumbo's Code of Conduct (Chapter 9 on Intervention and Speaking Up) and complies with the Dutch Whistleblower Protection Act (2023) and relevant EU directives, providing robust protection for Whistleblowers.

Policy Objectives

The Policy aims to:

- Provide a safe and supportive environment for raising concerns.
- Protect Whistleblowers from retaliation or adverse consequences.
- Promote transparency and accountability in Jumbo's operations.
- Ensure compliance with applicable laws and regulations.

Through this Policy, Jumbo is committed to being a reliable, ethical organization that respects and ensures the safety of Whistleblowers while maintaining a culture of honesty and integrity.

Scope of this Policy

Whistleblowers who report suspected or actual wrongdoing, including breaches of (EU) law or unethical behaviour within Jumbo, are entitled to protection under this Policy. The scope includes but is not limited to:

1. Undesirable Behavior:

- Aggression or violence
- Bullying
- Discrimination
- Harassment
- Retaliation
- Sexual harassment

2. Working Environment & Sustainability:

- Excessive work pressure or unrealistic targets
- Unsafe working conditions
- Workplace conflicts
- Climate, environmental or human rights concerns

3. Other Breaches:

- Accounting, internal accounting controls or audit irregularities
- Breach of external laws, regulations or Jumbo Policies
- Fraud, theft, bribery or corruption
- Antitrust and competition law violations



- Breach of confidentiality or data privacy
- Conflicts of interest
- Unfair treatment of customers
- Market abuse or insider trading

Whistleblower Protection

Jumbo guarantees that all Whistleblowers will be protected against retaliation in accordance with the Dutch Whistleblower Protection Act (2023). This protection includes protecting Whistleblowers from adverse treatment or consequences as a result of their reporting. Confidentiality is guaranteed and all information is treated with the utmost care and discretion.

Reporting Channels and Procedure

Who can report?

Any individual performing work-related activities for Jumbo can report concerns.

Whistleblowers can report concerns using the following channels:

- Their line manager or another manager within Jumbo
- Jumbo's Integrity Committee (General Counsel and Senior HR Advisor) at ic@jumbomaritime.nl
- External Confidential Counsellor(s) at ArboUnie +31 882726026 or vertrouwenspersoon@arbounie.nl

Concerns can be made orally or in writing. Whistleblowers can remain anonymous, although this may limit the thoroughness of the investigation. Whistleblowers are not obliged to use the above channels to raise concerns about suspected irregularities, but using these designated channels will ensure that reports are assessed directly and without delay.

Procedure of reporting:

- Whistleblowers receive confirmation of their report within 7 days.
- The reported concern will be investigated. Follow-up contact may be required for clarification via the (anonymous) communication channels provided.
- Within three months of the report, Whistleblowers are informed about the investigation's progress and planned actions.
- Whistleblowers are updated on the investigation's outcomes and subsequent steps.

Relevant legislation

This Policy is in full compliance with the Dutch Whistleblower Protection Act (2023) and relevant EU directives, ensuring comprehensive safeguards for all Whistleblowers.

Support and training

To foster awareness and trust, Jumbo provides training on this Policy to all employees and stakeholders. This training covers reporting procedures, whistleblower rights and the importance of maintaining a Speaking Up culture.

Peter de Bree
Chief Executive Officer

Schiedam, 28 February 2025

Kahn Scheepvaart B.V.
Jumbo Shipping Contractors B.V.
Kahn Offshore B.V.
Jumbo Offshore Installation Contractors B.V.
Jumbo Philippines

