

SUNROCK

Speak-up Policy

Becoming better by being responsive

Update 2025

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Why a Sunrock Speak-up Policy?

At Sunrock, integrity, transparency and accountability are at the heart of how we do business. This Speak-up Policy reflects our commitment to fostering a culture where everyone – employees, partners and stakeholders – feels safe and able to raise concerns about unethical, illegal or unsafe behaviour.

We recognise that early identification of potential issues is essential to maintaining trust, protecting our people and the environment, and upholding our responsibilities under international human rights and sustainability standards. Whether it's a concern related to human rights, environmental impact, workplace conduct, or compliance, we want to ensure we hear every voice – without them fearing retaliation. By encouraging open dialogue and providing secure, confidential reporting channels, our Speak-up Policy helps us live up to our values and continuously improve as a responsible and resilient organisation.





Why people should speak up

At Sunrock, we believe that building a socially, ethically and environmentally responsible company is a shared goal. Each of us – employees, partners and other stakeholders – has a role to play in upholding our values and standards.

Using sound judgment and speaking up when something doesn't seem right is essential. We understand that raising concerns can be difficult and takes courage. That's why we provide safe, confidential and accessible channels for you to speak up – without fear of retaliation.

Speaking up helps us:

- 🔗 fix mistakes early
- 🔗 prevent issues from escalating
- 🔗 ensure compliance with laws and regulations
- 🔗 continually improve our practices.

By voicing concerns, you help us protect what matters most: our people, our planet and our purpose.

When to speak up

At Sunrock, we encourage all employees and stakeholders to speak up whenever something feels off – it could be a decision or deed that doesn't fit with our values, policies, commercial agreements or the law.

You should speak up if you notice:

- 🔗 things that conflict with Sunrock's Code of Conduct or policies
- 🔗 violations of regulations or the law
- 🔗 unethical or unsafe behaviour
- 🔗 issues that affect human rights, the environment or the safety or culture of the workplace.

You can raise concerns directly with the people involved or, if you prefer a more-secure and anonymous route, through our confidential reporting channels. By speaking up, you help us maintain a healthy workplace culture, prevent harm, and continuously improve.

If you are a victim of misconduct or witness it affecting a colleague

- Physical and verbal abuse
- Bullying and harassment
- Sexual intimidation

When you suspect something could be a crime

- Conflict of interest, fraud, corruption
- Theft
- Other breaches of law

If you see unsafe behaviour on site involving a (sub-) contractor or a Sunrocker

Conflicts or negative work atmosphere with a fellow Sunrocker or manager

Project-related issues that could lead to financial or reputational damage to Sunrock

Privacy breaches and data leaks

- E.g., Sending a sensitive email to the wrong person externally

Who can speak up

Anyone can report a concern – whether you're an employee, contractor, supplier, customer or another stakeholder. You don't need to work for Sunrock to raise an issue.

We welcome feedback, suggestions and complaints from all stakeholders. We take every report seriously and handle it with care, confidentiality and respect.





Ways to raise your concerns

At Sunrock, we encourage open communication and early resolution of concerns. While we prefer resolving issues directly with the person involved, we understand this isn't always possible or comfortable. That's why we offer many safe and accessible ways to speak up:

- Direct discussion with the individual concerned (bilateral resolution)
 - Your manager or HR representative
 - Confidential counsellors
 - QHSE Manager or ESG Manager
 - Sunrock Works Council (in appropriate cases)
 - Whistleblowing system (also for anonymous reporting)
 - External mediator (in specific cases)
- Speak-up channel for reporting misconduct or quality concerns
 - External mediator (in specific cases)

For Sunrock employees:

For external stakeholders:

- Your Sunrock contact



Bilateral conflict resolution

We encourage open and respectful communication that solves issues. Bilateral conflict resolution is an initial approach within our Speak-up Policy. We prefer employees to address personal or professional disagreements constructively and, if feasible, without involving anyone else.

Non-violent communication and mutual understanding is at the heart of this approach. When engaging in bilateral conflict resolution, we encourage employees to:

- 🔄 listen to one another without interruption or judgment
- 🔄 focus on facts rather than assumptions or interpretations
- 🔄 express feelings and needs clearly and respectfully
- 🔄 make constructive and positive suggestions aimed at resolving the issue.

Bilateral resolution is most effective when both parties are committed to empathy, transparency and a shared goal of maintaining a healthy and inclusive workplace. While not every conflict can be resolved like this, the approach is a valuable first step before seeking mediation or formal escalation.

Sunrock supports all employees in developing these skills, and encourages their use as part of our commitment to a respectful and resilient organisational culture.



Approaching the Sunrock Works Council

In certain cases, Sunrockers can choose to involve the Sunrock Works Council (SWC) in addressing workplace concerns. The SWC serve as an intermediary between employees and the Executive Team, with a mandate to represent collective interests and contribute to a fair and transparent working environment.

- **Conflicts or concerns involving the Executive Team:** If a matter directly relates to something the Executive Team does, the SWC can act as a channel for raising and discussing your concerns.
- **Requests to change regulations or policies:** The SWC plays a formal role in reviewing and advising on proposed changes to company-wide policies or workplace regulations.
- **General workplace concerns:** You can bring broader issues affecting teams or departments to the SWC when they require structural or policy-level attention.

You can approach the SWC in the following situations:

Approaching the SWC (continued)

It is important to note the boundaries of the SWC's role:

- ❏ Implementing existing policies and regulations is not within the SWC's scope.
- ❏ Managers are responsible for operational matters.
- ❏ Private or personal cases – such as individual disputes or HR matters – are not intended for the SWC and should be resolved by the parties involved or through other grievance channels.



Support of the Confidential Counsellors*

Sunrock provides access to Confidential Counsellors to support employees facing personal or professional challenges. These counsellors offer a safe and supportive space for reflection and guidance. Confidential Counsellors do not act as mediators. Their role is to:

- 🔄 provide moral support during difficult situations
- 🔄 offer assistance and advice on possible steps to take
- 🔄 facilitate conversations with other people involved in the issue, if requested
- 🔄 offer support throughout whistleblower cases.

Sunrock has appointed Confidential Counsellors in all the countries where we operate. This ensures you have culturally and contextually appropriate support available.

Confidential Counsellors treat all dealings as strictly confidential, and we encourage you to contact them whenever you need guidance, support or someone to talk to.



Using the whistleblower channel

Sunrock maintains a safe, ethical and legal workplace. To support this, we provide a confidential whistleblower channel for reporting concerns related to:

- ☉ violations of the law
- ☉ breaches of Sunrock policies – for example, relating to quality, ESG, commercial or safety policies
- ☉ non-conforming or unethical behaviour.

How to report

You can raise concerns:

- ☉ via the official [website](#)
- ☉ by phone
- ☉ in a confidential meeting.

You may submit reports anonymously. All reports are treated with the highest level of confidentiality, to protect the identity and integrity of the whistleblower.

Handling of reports

The ESG Manager and General Counsel are jointly responsible for managing the whistleblower process. Their responsibilities include:

- ☉ receiving and registering reports of suspected misconduct or irregularities
- ☉ appointing members of the investigation team, if needed
- ☉ supporting and guiding the investigation team
- ☉ advising on improvements, based on findings.

Using the whistleblower channel (continued)

The ESG Manager and the General Counsel are also responsible for:

- 🔄 contacting the complainant or whistleblower (when possible)
- 🔄 monitoring the progress of investigations, and intervening when necessary
- 🔄 reporting statistics and summaries of relevant cases to the Sunrock Executive Team
- 🔄 reviewing and updating the whistleblower policy periodically.

We encourage all employees to speak up when they witness or experience misconduct. The whistleblower line is a vital tool in safeguarding our values, and ensuring accountability across the organisation.

For more information on how we handle whistleblower cases, see Annex I of this policy.



External mediation - YoumanFischer

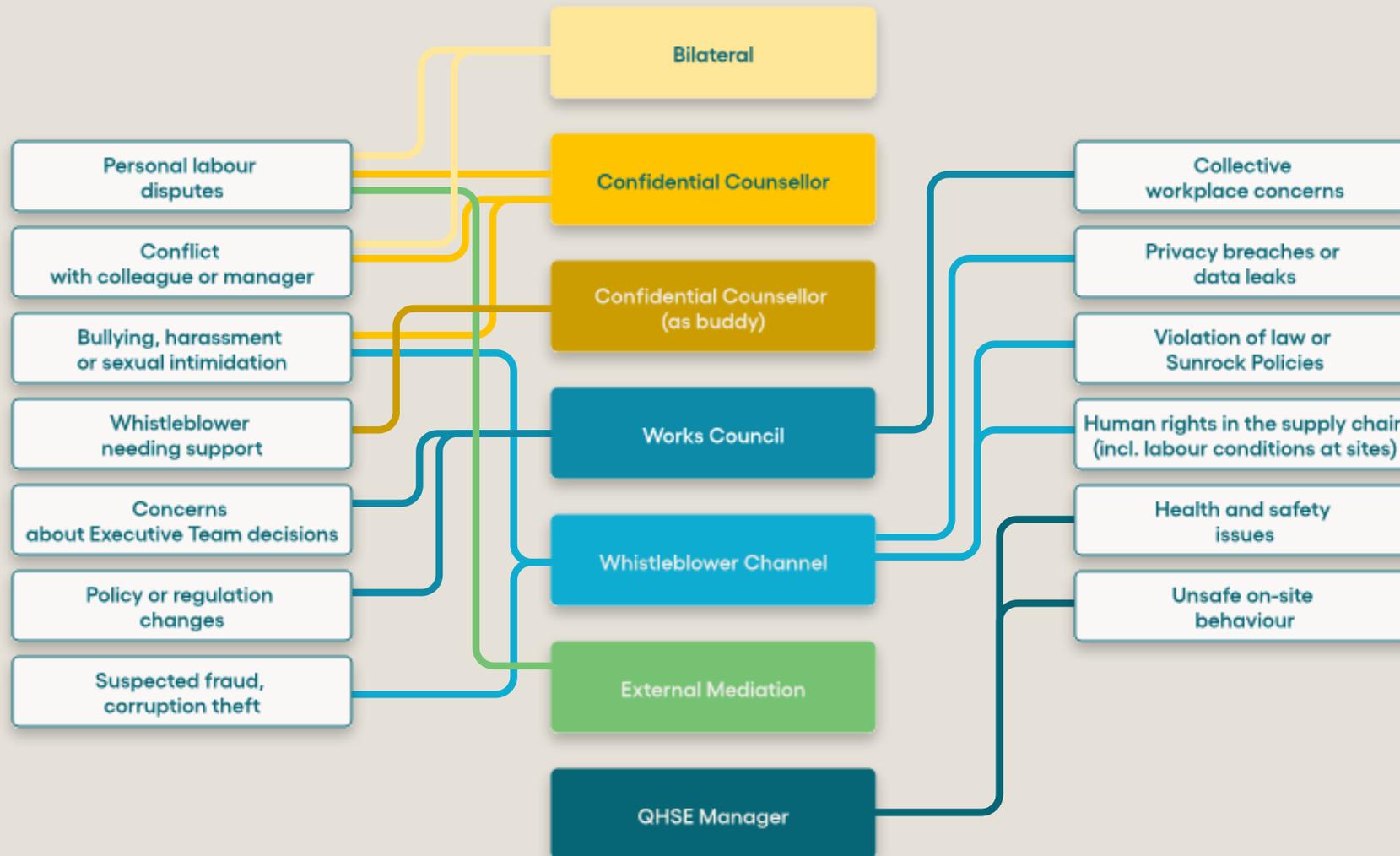
If you prefer, you can also settle conflicts with Sunrock through independent third-party mediation by a company called YoumanFischer, instead of, or before, bringing a case for judicial review. Mediation offers a flexible, cost-effective, and timely way to resolve disputes while preserving relationships and allowing parties to maintain control over the outcome. It is generally more accessible and less adversarial than formal legal proceedings.

Mediation is available for all types of conflicts. We encourage employees and others to consider this method when appropriate, and ask for guidance from HR, the ESG Manager, or General Counsel, on how to start the process.





Summary of different internal Speak-up systems





Contact details: Case handlers, Whistleblower system



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Anonymous Whistleblower form
<https://whistleblowersoftware.com/secure/sunrock>



Contact details: External channels

Entity	Type of issue	Contact
YoumanFischer	See slide 14	https://youmanfischer.nl/secretariaat@youmanfischer.nl
COFRA Holding	You can contact COFRA Holding for any complaints about any issues that relate to the operations of Sunrock that you do not wish to be handled internally by Sunrock or through the mediation partner.	Marie-Christine Schoute speakup@cofraholding.com
International RBC Agreement	Third-party arbitration procedure for conflicts regarding operational and supply-chain human rights issues.	https://www.imvoconvenanten.nl/en/renewable-energy/about-agreement/complaints-and-disputes REAsecretariat@ser.nl



Contact details: External channels

Entity	Type of issue	Contact
OECD National Contact Point	This body mediates conflicts regarding severe social and environmental impacts caused or contributed to by a company.	<ul style="list-style-type: none"> 🔗 https://www.oecdguidelines.nl/contact 🔗 https://www.bmwk.de/Redaktion/DE/Textsammlungen/Aussenwirtschaft/nationale-kontaktstelle-nks.html 🔗 pointdecontactnational-France@dgtresor.gouv.fr
National Labour Inspectorate	National Labour Inspectorate	<ul style="list-style-type: none"> https://www.bmwk.de/Redaktion/DE/Textsammlungen/Aussenwirtschaft/nationale-kontaktstelle-nks.html https://travail-emploi.gouv.fr/droit-du-travail/inspection-du-travail/article/les-missions-et-les-prerogatives-de-l-inspection-du-travail
National Whistleblowers Authority	You can report issues that relate to breaches of the law.	advies@huisvoorklokkenluiders.nl



Process with care

How we protect confidentiality when whistleblowing

When you speak up to report something that's not right, this is done confidentially. We will process the report with utmost care. We will save any data provided digitally, and it will be accessible only to those directly involved in the reporting process and investigation. We protect your identity at all stages of the process. If you have given your name, it will be given only to specific investigation team members. We disclose your identity only when legally obliged to, and after discussing it with you first.

How we prevent retaliation

Speaking up is brave and essential, and should be treated as such. We do not tolerate retaliation against anyone reporting an issue, and so any reprisal will be subject to disciplinary action. Reprisals taken against someone other than you – for example a family member, co-worker or anybody incorrectly believed to be the reporter, is also treated as retaliation. If a report turns out to be unfounded, we will protect the subject of the report from any negative consequences.

Reporting in good faith

We trust our whistleblowers to speak up with the best intentions and in the interest

of our company and the broader public. You can count on our protection if you have reason to believe the information was true when you reported it, even if it turns out to be inaccurate.

However, deliberately falsifying information can be subject to disciplinary or legal action.

Our duty of care towards the accused

Protection of the accused

We make protecting the individual or entity accused a priority. As soon as circumstances permit, we will inform them of the investigation. If the investigation finds no evidence to justify any action against the accused, we will safeguard them from any repercussions.

The accused may contact the Confidential Counsellors to request support during the process.





The investigation process

How we investigate your case

Once you have made a report through the whistleblowing channels, the General Counsel and the ESG Manager will evaluate the report and verify it as far as possible. If you reported your concern by phone or in a meeting, we document the oral reporting as minutes, and offer you the opportunity to change and confirm the minutes. If an investigation is needed, the above will form an investigation team, and will include other functions depending on the nature of the grievance. If you provide contact details, we will let you know whether your report will be investigated further. If an investigation occurs, we will update you regularly on progress, taking into account your privacy.

If they find evidence of a violation of our guidelines, we will rectify the situation and do our best to protect those negatively affected

from further, unintended, negative effects. The manager of the employee found guilty of the misconduct will be told, and will work with the General Counsel and ESG Manager to decide upon appropriate measures. If these have HR implications, the Chief Financial Officer will be involved too.

Unsatisfactory outcome

If, after a reasonable amount of time, you believe your concern has not been adequately addressed, you can contact the external channels to continue your grievance (see slides 19 and 20) .



Administrative and evaluation processes

Record-keeping

We will record all activities, reports and information received. These records may contain initial contact reports, meeting notes and facts found during an investigation. After closing the reported case, we will not keep these records longer than required or allowed. We will keep only statistical data that will not be traceable to an individual. In line with the GDPR principle of privacy by default, the people receiving the reports and conducting the investigation should be mindful of including personal data in email conversations. That is, where possible, we don't name the whistleblower or the subject of the inquiry in emails.

Communicating lessons internally for future reference

- The statistics of reports of misconduct and quality complaints are discussed by the Sunrock Executive Team and the Sunrock Works Council every quarter. These statistics include the number of cases, locations, types of incidents, period of occurrence and whether the allegations reported were substantiated or not. Individual circumstances will never be provided or discussed.
- The effectiveness of the policy and the process will be reviewed once a year. The outcome of this analysis and the main lessons from cases will be provided to all Sunrockers.

Speaking up matters

Speak-up Policy

