1 PURPOSE

To define the responsibilities, authority and working method within Keizer International for receiving and handling reports from external parties. People outside our organisation must also be able to report suspected wrongdoing confidentially and, if they wish, anonymously, without fear of negative consequences.

2 PROCEDURE

2.1 Scope

This procedure is intended for anyone outside Keizer International who deals with us, including:

- suppliers, subcontractors and their employees, including the parties that manufacture, store and transport for us;
- customers and their employees;
- agency workers, self-employed contractors, former employees and job applicants;
- local residents and other stakeholders.

Reports can be made about suspected wrongdoing by or on behalf of Keizer International, for example:

- fraud, bribery or corruption;
- violations of human rights or labour rights, such as forced labour, child labour or underpayment;
- unsafe or unhealthy working conditions;
- environmental damage;
- breaches of laws and regulations or of our code of conduct.

Commercial complaints about products or deliveries are not covered by this procedure; these fall under the customer complaints procedure. Employees of Keizer International use the internal whistleblowing procedure or M06 Employee Grievances and Concerns.

2.2 Definitions

- **Wrongdoing:** a (suspected) breach of law, human rights, labour rights, safety, the environment or our code of conduct.
- **Reporter:** the person who makes a report.
- **Confidential counsellor:** Dennis Teunissen. Receives and records reports, is the point of contact for the reporter and monitors the deadlines. The confidential counsellor does not investigate or make decisions.
- **Back-up confidential counsellor:** [name]. Takes over the tasks of the confidential counsellor during absence or if the report concerns the confidential counsellor.
- **Handler:** the Director, who investigates the report and decides on the follow-up.
- **Detriment:** any disadvantage to the reporter as a result of the report, such as ending a business relationship, intimidation or exclusion.

2.3 Reporting channel

Reports are made by email to **compliance@keizerinternational.com**.

- Only the confidential counsellor and the back-up confidential counsellor have access to this mailbox.
- Reports can be made in Dutch, English or German.
- Reporters who wish to remain anonymous can use an email address that cannot be traced back to them. This allows Keizer International to stay in contact, ask questions and provide feedback.
- A reporter may also request a personal meeting with the confidential counsellor.

The confidential counsellor passes the content of the report on to the handler for investigation. The identity of the reporter is only shared if the reporter gives explicit consent.

The reporting channel is published on the Keizer International website on the "Integrity and reporting" page.

2.4 Process

Step	What	Who	Timeframe
1	Receive the report and record it in M07-B01 External report register	Confidential counsellor	Immediately
2	Acknowledge receipt to the reporter	Confidential counsellor	Within 7 days
3	Assess whether the report falls within this procedure; if not, refer the reporter	Confidential counsellor	Within 2 weeks
4	Investigation: gather information, hear all parties; follow-up questions to the reporter via the confidential counsellor	Handler (Director), external expert where needed	-
5	Decision on follow-up and measures	Handler (Director)	-
6	Feedback to the reporter on the follow-up	Confidential counsellor	Within 3 months of acknowledgement
7	Implement measures; close the report in the register	Handler; register closed by confidential counsellor	As agreed

The confidential counsellor and the handler are not personally involved in the report. If the report concerns the confidential counsellor, the back-up confidential counsellor takes over. If the report concerns the Director, [name of external adviser] is engaged as handler.

2.5 Protection of the reporter

Keizer International will not cause detriment to any reporter acting in good faith. This also applies to anyone who assists the reporter and to third parties involved. For a supplier or customer, a report has no consequences for the business relationship. Anyone who experiences detriment can report this through the same channel. This protection is in line with the Dutch Whistleblowers Protection Act (Wet bescherming klokkenluiders).

2.6 Confidentiality and privacy

- The identity of the reporter is not disclosed without their explicit consent, unless required by law.
- Information is shared only with those who need it for the investigation.
- Personal data is processed in accordance with the GDPR and kept for no longer than 2 years after the report is closed, unless a longer period is required by law.

2.7 External reporting

A reporter may also report directly to a competent external authority, such as the Dutch Whistleblowers Authority (Huis voor Klokkenluiders, huisvoorklokkenluiders.nl), which can also provide advice.

2.8 Communication

- Website: "Integrity and reporting" page in Dutch and English, including this procedure.
- Active suppliers are informed of the reporting channel by email.
- The reporting channel is included in the supplier code of conduct and in the onboarding pack for new suppliers.

2.9 Registration, reporting and evaluation

All reports are recorded in M07-B01 External report register, which is kept in a restricted folder: date, subject, handler, dates of acknowledgement and feedback, measures and date of closure. The confidential counsellor maintains this register. Once a year the confidential counsellor reports to the Director in anonymised form. The Quality Manager evaluates this procedure annually and updates it where necessary.

2.10 Responsibilities

Role	Responsibility
Director	Approving this procedure, investigating and deciding on reports (handler), implementing measures, ensuring no detriment occurs
Confidential counsellor	Managing the mailbox, registration, acknowledgement, point of contact and feedback to the reporter, monitoring deadlines, annual reporting. Replaced by the back-up confidential counsellor during absence
Quality Manager	Owning this procedure, communication and annual evaluation, ommunicating the reporting channel to suppliers

3 PARTICULARS

Related documents:

- M07-B01 External report register
- Supplier code of conduct

For approval:

Director Keizer International B.V.
Elst, 05-11-2026