

# SPEAK OUT

## Policy

|                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                           |                                    |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------|------------------------------------|
| <b>Objective</b><br><br><p>This policy describes the process for reporting wrongdoing within VodafoneZiggo. The aim is to enable employees, suppliers, and other partners to report issues that could harm the well-being of employees or the organisation's reputation.</p> <p>The document outlines how reports are received, handled, and followed up, so that everyone feels safe to make a report and the organisation can respond appropriately.</p> | <b>Policy Owner</b>       | Executive Director Human Resources |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <b>Policy Champion</b>    | Director Performance and Reward    |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <b>Day-to-day contact</b> | HelloHR                            |
|                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <b>Version/ Date</b>      | Version 3.0<br>January 2026        |
| <b>Scope</b><br><br><p>This policy applies to:</p> <ul style="list-style-type: none"> <li>· all internal and external employees of VodafoneZiggo;</li> <li>· job applicants;</li> <li>· shareholders;</li> <li>· suppliers; and</li> <li>· anyone working under the supervision of (sub)contractors for VodafoneZiggo.</li> </ul>                                                                                                                          |                           |                                    |

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# 1. INTRODUCTION

VodafoneZiggo encourages all employees, suppliers, and other partners to speak up when they encounter unwanted or illegal behaviour or actions that could harm our people, business operations, or reputation.

You can report concerns to your People Leader, HR, Security, or Compliance. For more information, see the SharePoint page '[How We Work](#)'. However, there may be situations where you prefer not to report through these channels. For this reason, an alternative reporting procedure is available: [Whispli](#), a confidential and anonymous hotline. Through Whispli, you can report suspicions of wrongdoing or unethical behaviour. VodafoneZiggo investigates these reports carefully and consistently. The hotline is accessible to internal and external employees, as well as other partners (such as contractors and suppliers).

VodafoneZiggo guarantees that all reports will be treated confidentially and that a suitable expert will investigate each report.

## 2. SPEAK OUT

### 2.1 WHAT IS MEANT BY SPEAK OUT?

'Speak Out' is the process for reporting actions or behaviours suspected to be in violation of our code of conduct, or that are illegal, unethical, or criminal. All reports of wrongdoing are handled confidentially and followed up in good faith.

The policy applies to employees, job applicants, shareholders, suppliers, and contractors of VodafoneZiggo. All of these groups can report wrongdoing.

### 2.2 WHAT CAN BE REPORTED?

Reporting (possible) wrongdoing can be important in various situations. This is especially true for criminal offenses. In addition, other forms of unwanted or illegal behaviour can also be reasons to report, such as behaviour that violates our code of conduct or laws and regulations.

Examples of wrongdoing include:

- Fraud, financial misconduct, bribery, or price-fixing;
- Security or data breaches;
- Discrimination, bullying, or (sexual) harassment;
- Misuse of systems, processes, or policies;
- Health and safety risks;
- Serious environmental issues.



If issues can be discussed and resolved well together, a formal report is not always necessary. However, it is important to consider whether a situation could be part of a bigger problem and whether it has truly been resolved. If you are unsure, discuss this through one of our reporting channels (see section 2.3).

## 2.3 REPORTING WRONGDOING

VodafoneZiggo aims to provide a safe and inclusive work environment. That is why there are several ways to report unwanted or illegal behaviour and situations. You are free to choose the reporting method that feels most comfortable for you. It does not matter which route you use, as long as any concerns are raised.

Below is an overview of the different ways employees can report wrongdoing:

- **Discuss the situation with a Trust Buddy**  
A Trust Buddy is an accessible contact point where you can find a listening ear or a safe, confidential place to share your story.
- **Discuss the situation with the person(s) involved**  
Talking directly with the person(s) involved can be an important step towards a solution. There are always people who can help you with this, such as a Trust Buddy or another confidential adviser.
- **Discuss the situation with your People Leader**  
Your People Leader can help you discuss the situation and decide on next steps.
- **Discuss the situation with the external confidential adviser**  
The external confidential adviser listens to your story and helps you think about what you want and can do to stop the unwanted behaviour or situation. Click [here](#) for more information about our external confidential adviser.
- **You can report behaviour or situations that violate rules, our code of conduct, or seem unethical to:**
  - Security: <https://vz.incident-melding.nl/external-app>
  - Compliance: [askcompliance@vodafoneziggo.com](mailto:askcompliance@vodafoneziggo.com)
- **Make an (anonymous) report via the external Whispli hotline**  
Whispli is a confidential and anonymous reporting channel. You can access Whispli online or by phone at +31 970 102 533 38. Whispli is available for internal and external employees, suppliers, and other external partners of VodafoneZiggo.
- **Report unacceptable behaviour by a customer or colleague**  
Reports of unacceptable behaviour by a customer or colleague can be sent to [gog@vodafoneziggo.com](mailto:gog@vodafoneziggo.com). In your email, please include the customer number and the date and time of your conversation with the customer or colleague.



For a complete overview of available information and contact options, visit the following page: [Reporting Channels: where can you go?](#)

Depending on the reporting route chosen and the type of report, an appropriate investigation procedure will follow. All incidents are handled by specially trained staff.

In addition to these reporting channels, a reporter always has the right to report a suspected wrongdoing externally to competent authorities outside VodafoneZiggo and, where applicable, to institutions, bodies, and agencies of the European Union, such as the Dutch Whistleblowers Authority, regulators (for example, the ACM or AFM), or the Public Prosecution Service.

### 3. INVESTIGATION PROCEDURE WHISPLI

All wrongdoing reported to Whispli is handled by the internal Triage Team, which consists of employees from HR, Compliance, and Security.

The main task of the Triage Team is to determine the most suitable investigation method and propose measures. Investigations are conducted according to the document Internal Investigation Procedure.

The reporter is informed about the follow-up and outcome of the investigation, at least in outline, as far as legally permitted and with respect for privacy and confidentiality requirements. Any measures are assessed in accordance with applicable laws, HR policies, and procedures.

Wrongdoing reported via the external Whispli hotline is shared with the relevant members of the Triage Team for handling and investigation. If one or more members of the Triage Team are involved in the incident, Whispli sends the incident report only to the other members of the Triage Team.

### 4. PROTECTION AGAINST RETALIATION

We are aware that employees (both internal/external) or other relations sometimes prefer not to report abuses because they are afraid of repercussions or unwanted reactions. It is expressly part of this policy that the person who reports ('the reporters') should not be adversely affected by reporting an incident in good faith. It is very important that the reporters, and those who help/advise them<sup>1</sup>, are protected against retaliation, intimidation, or disciplinary action as a result of reporting an incident, to ensure that they can safely raise (possible) wrongdoing or concerns.

VodafoneZiggo does not accept under any circumstances that repercussions will be taken against the reporters, or to those who help/advise them, who report wrongdoing in good faith, regardless of whether the report is justified or not. It is the responsibility of management to ensure that the reporters who raise concerns in all sincerity are not subject to repercussions. Any violation of this may be reported to the Policy Champion who will then treat it as a reported incident.



Reports made in bad faith or for personal gain will not be tolerated and may result in disciplinary action.

## 5. REGISTRATION & REPORTING

All concerns reported via the external Whispli hotline to the Triage team, as well as matters reported to Security, are registered and monitored by the Triage team and/or Security until the investigation has been completed. This follow-up ensures that reports are handled with due care and that appropriate anonymised reporting can take place to the Regulatory, Risk & Compliance Committee.

Investigations are conducted and followed-up in accordance with the Internal Investigation Procedure, taking into account applicable retention periods for personal data and other relevant laws and regulations. Reporting is anonymised to the extent legally and operationally possible.

## 6. DOCUMENT INFORMATION

| Version | Date          | Approved by                                              | Adjustment                                                                                  |
|---------|---------------|----------------------------------------------------------|---------------------------------------------------------------------------------------------|
| 1       | January 2018  | Risk & Compliance Committee & Anja Maassen-van den Brink | Original document                                                                           |
| 1.1     | April 2018    | Tim Langelaar                                            | Change of contact details Expolink                                                          |
| 1.2     | June 2018     | Anja Maassen van den Brink                               | Name change of Speak Up to Speak Out; Small changes                                         |
| 1.3     | October 2019  | Linda Porter                                             | Small changes and references to Keyconcept and investigation process in paragraph 2.3 and 6 |
| 1.4     | December 2019 | Linda Porter                                             | Small changes and additions investigations manager and Triage Team                          |
| 2.0     | August 2021   | Jihad Terazi                                             | Change from reporting tool and minor text updates.                                          |



|     |              |                                                   |                                                                                              |
|-----|--------------|---------------------------------------------------|----------------------------------------------------------------------------------------------|
| 2.1 | June 2023    | Britt Springintveld /<br>Jacqueline van Heeswijk  | Annual update and mandatory changes under the Whistleblower Policy, and Trust Buddies added. |
| 3.0 | January 2026 | Erik Wassink/Jacqueline van Heeswijk/Manon Bovens | Textual edits and clarifications; links and email addresses updated.                         |