

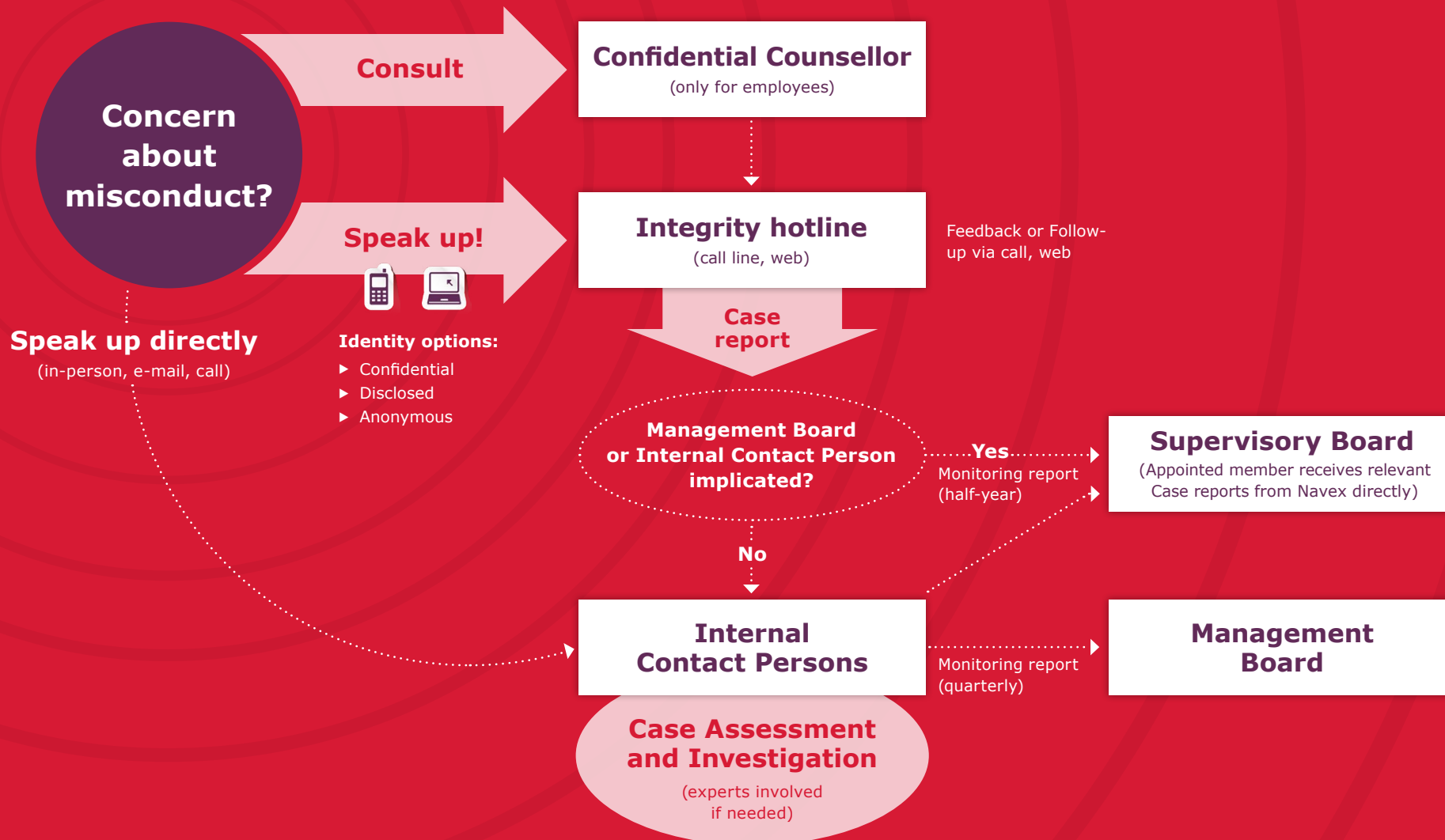
**SPEAK UP**

**POLICY** 

**RAISING CONCERNS IN CONFIDENCE  
ABOUT SUSPICIONS OF MISCONDUCT**



# SPEAK UP POLICY THE PROCESS



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This policy applies to all Stage Entertainment employees and everyone who performs work activities for or on behalf of Stage Entertainment. It can also be used by former employees, suppliers, shareholders, agents, distributors, representatives or persons that are in another way involved with Stage Entertainment.

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# 1 WHY AND WHAT TO SPEAK UP

If you perform work activities for Stage Entertainment, you are expected to uphold integrity, respect, and truthfulness and to speak up about concerns involving actual or potential misconduct, negligence or unethical behaviour.

We encourage you to speak up as soon as possible with whatever information you have, ideally when the potential misconduct can still be prevented or before a situation escalates. We do not expect you to have all the answers and ask you to never start investigating any concern yourself.

**Note:** If you need emergency assistance, please contact your local authorities or call your local emergency phone number. 112 is a common emergency telephone number that can be dialled free of charge from most mobile telephones and, in some countries, fixed-line telephones in order to reach emergency services (ambulance, fire and rescue, police.)

Situations when you should speak up:

- Non-immediate threat to health, safety and environmental issues;
- Discrimination or (sexual) harassment;
- Ethical breaches or conflict of interest;
- Deceit in commercial activity;
- Non-compliance with laws and regulations;
- Financial malpractice;
- Corruption;
- Inappropriate relationships with suppliers, clients or colleagues;
- Inappropriate disclosure of confidential or personal data;
- Concealment of any malpractice.

Please do *not* use this policy:

- To report an event presenting an *immediate* threat to life or property;
- To report a grievance you may have concerning your employment;
- To settle personal disputes;
- To make accusations that you know are false. Doing so may lead to disciplinary measures.

There are 3 ways you can speak up a concern under this policy:

## 1. Confidential Counsellor (employees only)

**Mariette van Beers**

+ 31 20 3052 440

vertrouwenspersoon-nl@stage-entertainment.com

**Henk Weber**

+31 611 511 579

h.weber@humancapitalcare.nl

## 2. the Navex Integrity Hotline



– phone number 0800 022 9604



– website

www.stageentertainment.ethicspoint.com

## 3. The appointed Internal Contact Persons

**Anne Roest Crollius**

contact1-misconduct@stage-entertainment.com

+31 20 3052 488

**Melanie Alzafari**

contact2-misconduct@stage-entertainment.com

+31 20 3052 499

## 2 ROLE OF EMPLOYEES' CONFIDENTIAL COUNSELLOR

A Confidential Counsellor is an advisor for employees on matters of undesirable behaviour and integrity. You can contact a Confidential Counsellor in cases of:

**1. Undesirable behaviour**, issues in the working environment, communication and leadership that harmed you and caused that you do not feel safe at work, for example a bullying, (sexual) harassment, aggression or violence, discrimination.

or

**2. Breaches of integrity**, issues that are harmful for the company, for example a theft, abuse of power, violation of rules, corruption.

The Confidential Counsellors at Stage Entertainment are:

**Mariette van Beers**

Internal Confidential Counsellor

Phone: + 31 20 3052 440

E-mail: [vertrouwenspersoon-nl@stage-entertainment.com](mailto:vertrouwenspersoon-nl@stage-entertainment.com)

**Henk Weber**

External Confidential Counsellor

Phone: +31 611 511 579

E-mail: [h.weber@humancapitalcare.nl](mailto:h.weber@humancapitalcare.nl)



## 3 HOW DOES THE CONFIDENTIAL COUNSELLOR WORK

The Confidential Counselor provides a safe environment in which you can freely and at ease disclose your issue under confidentiality\*. The Confidential Counsellor provides a listening ear where you can relieve your heart.

Based on your situation and needs, the Confidential Counsellor can give you a targetted advice about possible follow-up steps, solution directions and professional assistance. The Confidential Counsellor can assess together with you pros and cons of possible follow-up steps.

The Confidential Counsellor will help you to make a suitable choice and the Confidential Counsellor can guide you in the entire process if you wish so.

You set the direction and you decide which choices are made in the process; the Confidential Counsellor is there for you, stands next you, however does not take over the issue from you and will do nothing without your knowledge or permission.

The Confidential Counsellor provides you also possibility for confidential reporting about breach of integrity cases (misconduct). You can report a suspected misconduct confidentially and your identity will be known only to the Confidential Counsellor. The Confidential Counsellor acts as an intermediary between you and appointed Stage Entertainment representatives who will investigate the reported concern. If you report the suspected misconduct in good faith, you are protected from retaliation.



\*Except for cases of serious criminal offences

## ④ NAVEX INTEGRITY HOTLINE – THE CONFIDENTIAL WAY TO SPEAK UP

### NAVEX

The Navex Integrity Hotline is a specialized service centre for processing whistleblower reports. The service centre is operated by an external party, Navex, that can be reached via a free call line 0800 0229604, website ([www.stageentertainment.ethicspoint.com](http://www.stageentertainment.ethicspoint.com)).

The service is available in Dutch, English, French, German, Italian and Spanish and many other languages.

When contacting the Navex Integrity Hotline, you will be asked for a company code. Please use **'Stage Entertainment'** as the company code.

### YOUR IDENTITY

When speaking up via the Navex Integrity Hotline, there are three identity options:

**1. The confidential option**, under which your identity will only be known to Navex, Stage Entertainment will not know your name. We encourage you to use this option as Navex can contact you directly if they have any questions;

**2.** You can also choose to remain **anonymous**; or

**3.** to **disclose your identity** to Stage Entertainment.

### SUFFICIENT INFORMATION

When speaking up, please provide as much information as you can about:

- the background, history and reason for the concern;
- names, dates, locations and other relevant information;
- any documents that may support your report.

By providing sufficient information, you will help Navex and/or Stage Entertainment to assess and investigate your concern.

### CASE REPORT

Navex will create an anonymous case report based on the information you provide. If you have chosen to disclose your identity to Stage Entertainment, the case report will not be anonymous.

Navex will send the case report to the contact persons at Stage Entertainment. The Internal Contact Persons at Stage Entertainment who will receive the anonymous report from Navex are: Anne Roest Crollius, Group Director Enabling Services (HR and Legal), and Melanie Alzafari, Legal Counsel. If a contact person or member of the Management Board is implicated in the case report, Navex will send the case report to an appointed member of the Supervisory Board.

### FOLLOW-UP

After speaking up, Navex will send you a case number. You can use this number to log in on the call line or website to find out about the progress of your case's assessment and investigation. Using the case number, you can also add additional information about your concern via the call line or website. If you give your contact details to Navex, they will contact you with updates about the case.

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## HOW TO CONTACT THE NAVEX INTEGRITY HOTLINE

### You can contact the Navex Integrity Hotline:



**By phone:**

0800 022 9604



**By website:**

[www.stageentertainment.ethicspoint.com](http://www.stageentertainment.ethicspoint.com)

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## YOU CAN ALSO SPEAK UP TO THE INTERNAL CONTACT PERSONS DIRECTLY

You can also speak up a concern related to suspected misconduct to the Internal Contact Persons directly by e-mail, phone or in person. The Internal Contact Person will keep all information confidential. For record keeping purposes, the Internal Contact Person will create a case report via the Navex Integrity Hotline website.

### Stage Entertainment has appointed Internal Contact Persons:

**Anne Roest Crollius**

E-mail: [contact1-misconduct@stage-entertainment.com](mailto:contact1-misconduct@stage-entertainment.com)

Phone: +31 20 3052 488

**Melanie Alzafari**

E-mail: [contact2-misconduct@stage-entertainment.com](mailto:contact2-misconduct@stage-entertainment.com)

Phone: +31 20 3052 499



## 7 HOW WILL STAGE ENTERTAINMENT RESPOND AFTER YOU SPEAK UP A CONCERN?

### ASSESSMENT AND INVESTIGATION

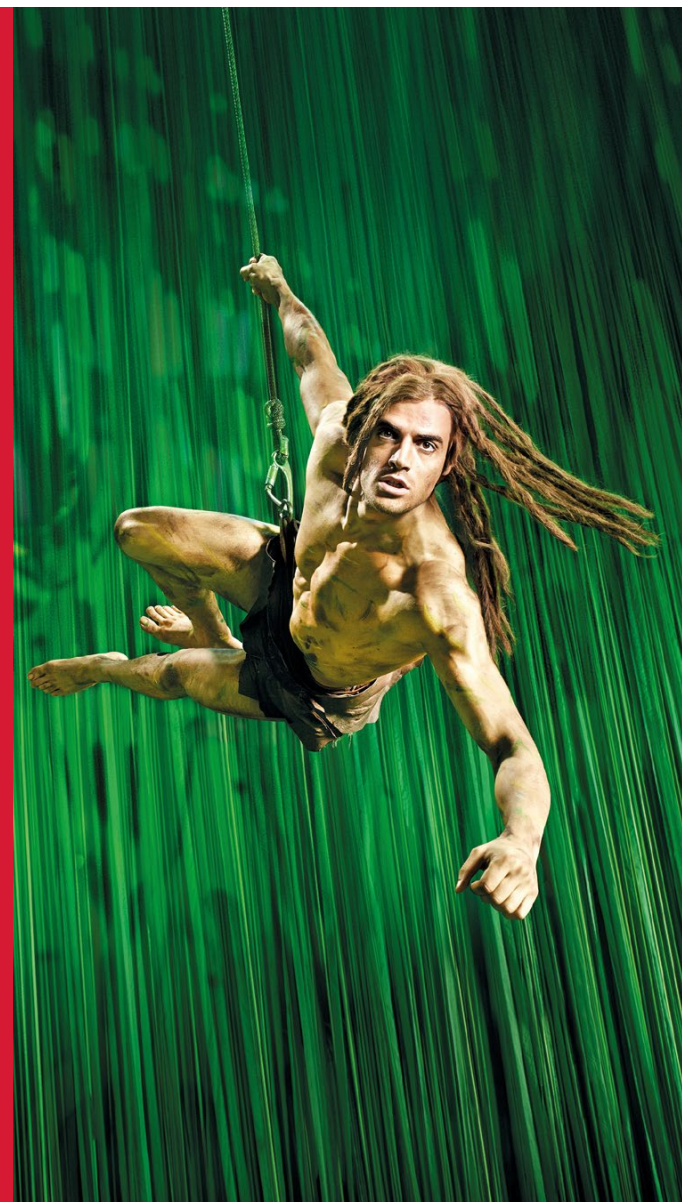
The Stage Entertainment Internal contact persons will ensure that the case report they receive from Navex is adequately assessed. Based on the outcome of the assessment, the contact person will decide on any further investigation. The contact person may bring in other internal or external experts in the assessment or investigation, provided these are not implicated in the case report. The assessment and investigation will be conducted in an independent, fair and unbiased manner with respect to all parties involved and in accordance with relevant laws and principles. Details of the case, your identity, and the identity of anyone else mentioned in the case report will be kept confidential during and after the assessment and investigation. Information will only be shared on a need-to-know basis.

### CONFIDENTIALITY

All persons involved in an investigation are required to fully cooperate and answer all questions completely and honestly. All persons involved, including the accused, are entitled to confidentiality. Therefore, if you participate in or learn about an investigation, you must keep the matter confidential.

### OVERSIGHT

The contact persons send reports, progress updates and outcomes about investigations to the Management Board every quarter, and to the Supervisory Board at least once every six months. If an internal contact person or a member of the Management Board is implicated in a case report, the investigation is coordinated by an appointed member of the Supervisory Board.



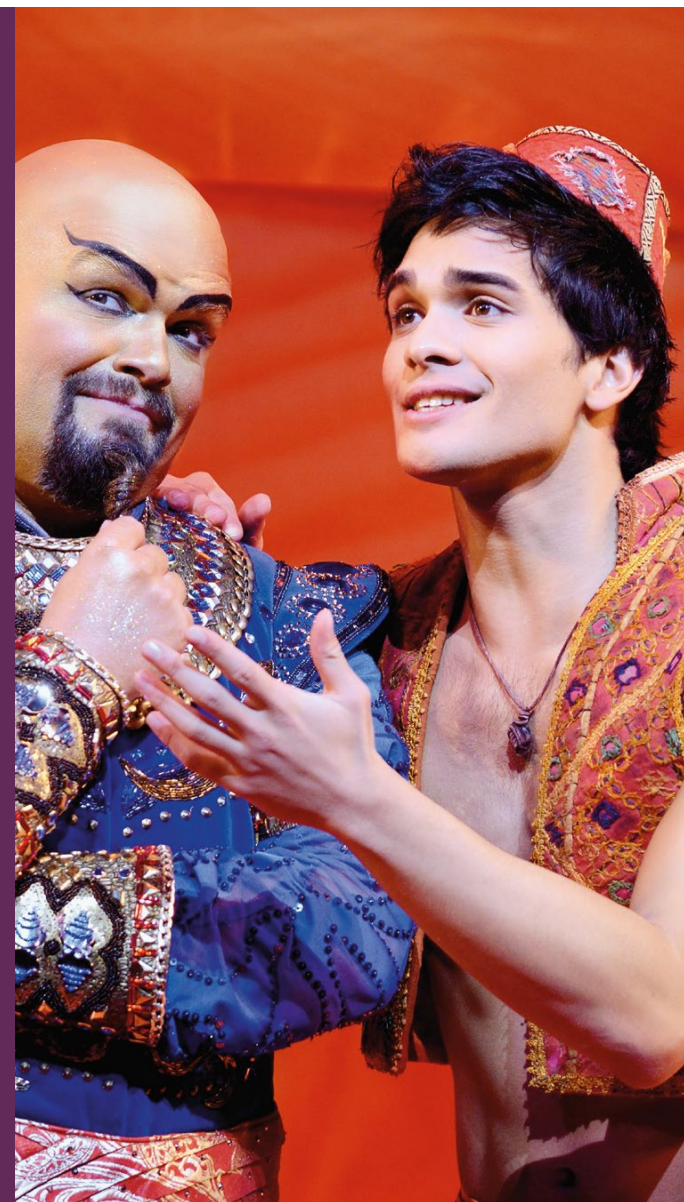
## 8 REPORT INTERNALLY FIRST

Anyone speaking up a concern related to suspected misconduct should first do so internally via the Navex Integrity Hotline, Internal Contact Persons or Confidential Counsellor, unless such internal reporting is ineffective, intimidating or contrary to public interest.

If internal reporting is ineffective, intimidating, contrary to public interest, or if you are required by law to report your concerns, please do so to a designated public authority. If there is no designated public authority for the suspected misconduct, you can contact the investigation department of *Huis voor Klokkenluiders* (the Dutch Whistleblowers' Authority).

You can find additional information about reporting misconduct to Huis voor Klokkenluiders on their website: <https://huisvoorklokkenluiders.nl/whistleblowers-authority-huis-voor-klokkenluiders-english>

Employees and persons working for Stage Entertainment are not allowed to communicate to the public or media about issues concerning Stage Entertainment unless they have received specific authorisation to do so.



## **9** NON-RETALIATION, CONFIDENTIALITY AND PRIVACY

### **NON-RETALIATION**

If you speak-up a concern in good faith, we will not allow any form of retaliation against you. Should any person engage in retaliation, directly or indirectly, we will take disciplinary action.

### **CONFIDENTIALITY**

Information about your identity and the case will be kept confidential and on a strict need-to-know basis. Your identity will not be disclosed to anyone implicated in the case report.

### **PRIVACY**

Personal data obtained under this policy will only be used for the purposes explained in this policy or to comply with the law or an important public interest. Stage Entertainment will safeguard personal data from unauthorized access or processing.

## **10** MORE INFORMATION?

If you have questions relating to this Speak Up Policy or the Code of Conduct, please contact your HR Manager, Legal Counsel or one of Confidential Counsellor.

In addition to internal advice, you can always consult the advice department of the Huis voor Klokkenluiders. The advice department provides free, independent and confidential advice to employees who have concerns about misconduct but are unsure about whether or not to report it.

## 11 DEFINITIONS

**CASE REPORT** – A report prepared by Navex about a concern spoken up. The identity of the person who has spoken up the concern is not disclosed in the case report, unless the person agreed to do so.

**CONCERN** – Knowledge of suspected or real misconduct, negligence or incident.

**CONFIDENTIAL COUNSELLOR** – An advisor who assists employees with confidential matters involving undesirable behaviour (e.g. sexual harassment, discrimination, racism, aggression and violence) that negatively affects the work environment.

**NAVEX** – Operator of Integrity Hotline.

**NAVEX INTEGRITY HOTLINE** – A specialized service centre for processing whistleblower reports for companies. The service centre is operated by an external party, Navex, and can be reached via a free call line, website and smartphone application. The service is available in Dutch, English, French, German, Italian and Spanish and many other languages.

**INTERNAL CONTACT PERSON** – Appointed employees at Stage Entertainment to whom you can speak up a concern under this policy.

**MANAGEMENT BOARD** – The Management Board of Stage Entertainment.

**NEED-TO-KNOW BASIS** – A security method in which information is only given to those who can present a good case for knowing about a project.

**STAGE ENTERTAINMENT** – Stage Entertainment B.V. and all its subsidiaries.

**WE** – In this policy, 'we' refers to the Management Board of Stage Entertainment.

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