

REFUELS N.V. WHISTLEBLOWER POLICY

Overview

Refuels N.V. (“**ReFuels**”) is committed to ensuring that ReFuels, its board of directors and employees always act in compliance with all applicable laws and regulations, due care and utmost honesty and in accordance with ReFuels’s Code of Conduct. In addition, ReFuels directors and employees are required to observe and comply carefully and diligently with the rules of any relevant regulatory bodies from time to time in force. This Policy aims to support compliance with applicable laws and ensure effective corporate governance and a healthy and safe working environment. Should any matters of concern come to the attention of a director or employee, ReFuels wishes to ensure that he/she can make a report in accordance with the procedures set out in this Policy without the risk of retaliation and assurance that such report will be treated confidentially and properly investigated.

Principles

Reports of suspected irregularities or malpractice should be substantive, made in good faith and relate to an issue or conduct, including:

- Conduct, which is corrupt, dishonest, or fraudulent
- Actual or threatened breach of any of the ReFuels Code of Conduct, policies, or procedures
- Actual or threatened criminal activity or breach of any laws or regulations
- A danger to any individual’s health, safety and security or the environment
- Theft or fraud against ReFuels
- Behaviour which is detrimental to the interests of ReFuels
- Improper accounting, financial reporting practices or internal controls
- Mismanagement or abuse of authority
- Intentional misstatements or false statements to or by directors or employees, to ReFuels’s auditors and/or any public or governmental authority
- Deliberate concealment or destruction of information regarding issues or conduct as described above.

Making a report

Under this Policy, suspected issues may be reported in the following ways:

- (i) Employees are encouraged to report any matters to their line manager either in writing or in person in the first instance. Reporting any concern to management is often the quickest and most effective way to address a work-related issue and ensure a positive and open work environment.
- (ii) If the matter is more serious or if employees prefer, they may report issues to the CEO (including when they do not feel comfortable discussing it with their line manager, or when an issue has been previously reported and the employee believes that no action has been taken). If the suspected issue relates to the CEO, the matter may be reported directly to the Chairperson of the ReFuels Board.
- (iii) In some circumstances, it may be appropriate for employees to report concerns to an external body, such as a regulator. Certain independent whistleblowing charities operate confidential helplines and provide lists of prescribed bodies to which certain types of issues may be reported. It will very rarely, if ever, be appropriate to report concerns to the media.

What happens once a report is made?

All reports made under this Policy will be properly investigated with the aim of identifying evidence that either substantiates or refutes the information reported. All reports will be handled in a confidential



manner and confidentiality will be preserved as far as possible, consistent with the need to conduct a proper investigation and applicable privacy laws in the country(ies) involved.

As soon as reasonably practicable, the person responsible for investigating the concerns will advise the employee in writing, as soon as practicable after the concerns were first reported, of the investigation that will be carried out by ReFuels. The form and method of investigation will depend on the individual circumstances of the case. The whistleblower may be asked to provide additional information. The whistleblower will be kept updated on progress of the investigation, but it may not be appropriate to disclose interim findings. Any person against whom a concern is reported, if identified, will also be informed of the investigation as soon as practicable and will be given the opportunity to respond. If a report is found to be inaccurate, any misinformation will be noted. Employees should treat any information about the investigation which is given to them as confidential.

Following conclusion of the investigation, the whistleblower will normally be advised of the corrective action to be taken by ReFuels and the timescale for taking such action. However, sometimes the need for confidentiality may prevent ReFuels giving specific details of the investigation or any disciplinary action taken as a result. ReFuels is committed to implementing the recommendations of an investigation with a view to rectifying any wrongdoing as far as practicable in the circumstances.

Anonymous reports

ReFuels encourages openness and for its employees to report any issues under this Policy openly, to ensure a proper investigation may be carried out. ReFuels will support employees who raise genuine concerns, even if they turn out to be mistaken. If, however, this is not feasible, the matter may be reported anonymously via an anonymous letter to ReFuels. ReFuels will investigate any such reports, but the investigation may be impeded and potentially prevent appropriate steps from being taken if the whistleblower is not contactable to provide additional information.

Will employees be penalised for reporting issues?

Reports made in good faith or participation in the investigation of a report in accordance with this Policy will not affect an employee's (provided they are not found to have been involved in the issue reported) position within or engagement with ReFuels (e.g. by suffering harassment, discrimination, demotion or dismissal). An employee who believes he/she has been penalised as a result of being a whistleblower or due to participation in the investigation of a report should immediately raise this through one of the reporting methods identified in this Policy. Any employee or line manager who is found to have dismissed, demoted, victimised, discriminated against or in any other way retaliated against, a whistleblower or participant in an investigation of a report made by a whistleblower, will be subject to disciplinary measures that may include dismissal.

What if a false report is intentionally made?

Whilst ReFuels does not discourage employees from reporting matters of genuine concern, it is recommended that the employee ensures, to the extent possible, that a report is factually accurate, complete, based on first-hand knowledge and without material omission. Where it is established that a whistleblower is not acting in good faith or has intentionally made a false report, that employee may be subject to disciplinary action that may include dismissal.

Approved by Board of Directors: 12 May 2023