

# FMO

Entrepreneurial  
Development  
Bank

## **SPEAK UP POLICY & PROCEDURE**

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# 1. INTRODUCTION

*Integrity is a key value of FMO. As a responsible organization and employer that listens to its employees and Third parties, FMO is committed to stimulating and ensuring a safe environment and to maintain sound business conduct. Wrongdoings may have a negative impact on this commitment. It is therefore essential to FMO that all employees and Third parties are aware of how to act in case of (or any suspicion of) Wrongdoings.*

FMO's Code of Conduct (contained within the Personnel Guide) outlines the key requirements that steer professional activities, decisions, and procedures within FMO. Failure to meet these requirements may expose FMO and its employees to possible regulatory and/or criminal liability. FMO therefore encourages its employees and Third parties to (anonymously) report Wrongdoings and/or suspected Wrongdoings so that FMO is aware of, can deal with, and prevent issues, including the ability to draw lessons learned and improve business procedures.

## 1.1 Background and objectives

In the Netherlands, laws and regulations are in place (Dutch Whistleblowers Protection Act) (*Wet bescherming klokkenluiders*) and article 7:658c Dutch Civil Code) that set certain requirements regarding dealing with Wrongdoings and the protection of Whistleblowers in case thereof. By means of this Speak Up Policy and Procedure ("the Policy"), which qualifies as a whistleblower policy (*klokkenluidersregeling*) by definition of the Dutch Whistleblowers Protection Act, FMO seeks to provide a clear procedure to report and investigate any (suspicion of) Wrongdoings and/or any breach of law or regulation that may adversely impact FMO.

The benefits of having a speak up policy, which encourages employees and Third parties to raise Wrongdoings, include:

- creating an internal culture in which employees can raise genuine concerns regarding (potential and suspected) Wrongdoings of a general, operational, or financial nature which they feel unable to address within the regular reporting structure or other speak up channels. FMO understands that certain barriers exist in speaking up, especially when loyalty is at stake or if an employee is afraid of personal or professional consequences;
- increasing the likelihood of alerting management to problems so that these can be addressed to prevent (further) damage. This Policy is important for FMO as an organization as integrity and reputation are of utmost importance for FMO; unreported Wrongdoings may jeopardize this. Having a culture in place which promotes employees to speak up will ensure that Disclosures pertaining to possible Wrongdoings are properly investigated and relevant information reaches management in good time when necessary; and
- helping to deter employees from engaging in Wrongdoings by strengthening the atmosphere of openness, transparency, and integrity.

FMO is committed to ensure that every Disclosure made under this Policy is reviewed thoroughly, on a timely basis and that the investigation is fair to all parties involved.

It is important to note that employees who disclose Wrongdoings in good faith are protected by the Whistleblower status and FMO's non-retaliation principle. While a Disclosure may be filed anonymously, if the Whistleblower is known the identity of the Whistleblower is kept confidential in accordance with the rights of the reporting person (Annex I).

## 1.2 Individuals in scope

This Policy applies to all employees, including those working in FMO's local/representative offices abroad, any of the direct or indirect subsidiaries which are consolidated, e.g. FMO Investment Management B.V. (FMO-IM), and to any Third party with whom FMO has or has had some type of relationship (e.g., externals, business partners, suppliers, shareholders, customers) who wish to raise a Wrongdoing about possible misconduct within FMO, or its subsidiaries. Where it reads 'FMO', if the context requires so, it should also be read as 'FMO-IM' unless explicitly stated otherwise.

If there is a conflict between this Policy and Dutch laws or regulations, including rules of professional conduct, Dutch laws and regulations will take precedence.-Based on the Service Level Agreement (SLA) between aforementioned parties, FMO-IM has outsourced to FMO activities to be performed pursuant to this policy.

## 1.3 Scope of the Policy

Any actual, potential or suspected Wrongdoing is in scope of this Policy and can be disclosed. All Disclosures will be reviewed; however, FMO finds it important to note that there are several conditions which impair the chances that a reviewed Disclosure will be investigated. Paragraph 3.2 lists example conditions which can be used when assessing and weighing information provided in a Disclosure.

The Policy relies on the reasonable expectation that reporting a potential Wrongdoing will be done in good faith, and, by way of example, may not be used as a mechanism for raising malicious or unfounded allegations against colleagues.

## 1.4 Definitions

In this Policy the following definitions are used:

### Disclosure

A notification (verbal or written) made by the Whistleblower about a Wrongdoing.

### External Facilitator

An external person/company contracted by FMO to act as an impartial and independent assessor of a Disclosure received through the Speak Up Tool. If the Disclosure warrants further investigation, the External Facilitator will consult with Compliance or, when it is deemed not suitable due to the nature of the Disclosure, directly with the Management Board and/or Supervisory Board.

### Wrongdoing

An act or behavior (or the suspicion thereof) in relation to FMO, that violates integrity standards, including acts of fraud, corruption, market abuse, discrimination, harassment, safety violations, environmental violations or other unethical or illegal behavior (e.g., a breach of FMO's Code of Conduct).

This includes, but is not limited to, a **public interest wrongdoing** related to FMO, which is:

- A violation, or a threat of violation, of a rule or regulation imposed by the European Union; and
- An act or omission that involves the public interest, in the context of;
  - a violation, or a danger of a violation, of a law or internal guidelines implemented by FMO that contains a concrete obligation pursuant to a statutory regulation; and

- a danger to public health, to the safety of persons, to the deterioration of the environment or to the proper functioning of the public service or an enterprise as a result of improper conduct or failure to act.

In any case, the public interest is at stake if:

- the act or omission does not only include individual interests; and
- there is either a pattern or structural character or if the act or omission is serious.<sup>1</sup>

#### Third party

Any person, who is not an employee of FMO, with whom FMO has or has had some type of relationship (e.g., externals, business partners, suppliers, shareholders, customers).

#### Speak Up Tool

The (digital) tool that facilitates (anonymous) disclosures, through an app, a webpage and telephone, acting as the register for all speak up Disclosures under this Policy.

#### Whistleblower

The person, being an (former) employee of FMO or a Third party, who makes the Disclosure about a Wrongdoing.

## 2. KEY PRINCIPLES AND OBLIGATIONS

This Policy is based on six key principles and obligations:

1. **Disclosures under this Policy are taken seriously:** disclosures should avoid any unreasonable accusations and be initiated if, in the opinion of the Whistleblower, no other options are available to resolve the Wrongdoing.
2. **The protection of confidentiality:** it is mandatory to treat a Disclosure with confidentiality and the utmost care. The data is only accessible to the officers directly involved in the reporting and investigation process on a 'need to know' basis. While processing personal data, FMO will respect relevant requirements in line with FMO's Privacy Statement. The identity of a Whistleblower is not revealed without first obtaining the person's explicit consent unless disclosure is required by a court order in the context of subsequent judicial proceedings (in which case the Whistleblower will be informed about the disclosure of its identity).
3. **The prevention of victimization and non-retaliation:** a Whistleblower who has filed a Disclosure 'in good faith', and the person(s) assisting the Whistleblower (if relevant), will be appropriately protected from any negative impact (e.g., a demotion, discipline, dismissal, salary reduction, reassignment or defamation, discrimination or other forms of unfair treatment), including a threat or attempt of such act, as a result of their Disclosure. A Whistleblower is protected during and after the assessment/investigation of a Disclosure.

The Whistleblower and/or the person(s) assisting the Whistleblower (if relevant) who deems to have been victimized in violation of this Policy must report this immediately to the Director Compliance (or the External Facilitator). Appropriate measures will be taken against employees of FMO who

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<sup>1</sup> Employees of FMO can discuss irregularities of a personal, individual nature, with any manager or director within FMO or (one of) the FMO Confidentiality Counselor(s) (Please see: [Confidentiality Counselors \(sharepoint.com\)](#))

(attempts to) victimize a Whistleblower, and/or the person(s) assisting the Whistleblower (if relevant), (e.g., disciplinary action, civil action, or criminal prosecution).

4. **Anonymous reporting:** anonymous reporting and communication is possible under this Policy as facilitated by the Speak Up Tool.
5. **Reporting 'in good faith':** this Policy protects the Whistleblower who reports in good faith. A Disclosure is considered to have been made in good faith if the individual had reasonable grounds to believe the information was true at the time of the Disclosure. If it turns out the information was not true, but the Disclosure was made in good faith, the Whistleblower is still protected from retaliation. However, a Whistleblower cannot be granted immunity from investigation, disciplinary action, criminal prosecution, and/or civil liability. Where a Disclosure has been made in good faith, and subsequently leads to regulatory or court hearings, the Whistleblower may be obliged to act as a witness. Where this occurs, FMO will provide appropriate support and any necessary legal advice to the employee up to and throughout the hearing (see §6 Assistance).
6. **Protection of accused persons:** the person who is subject of an investigation will be informed about the cause of the investigation if appropriate, given the circumstances. When the investigation finds no evidence that justifies taking measures against the person who has been reported that person will be protected from any negative effects. If evidence is found and measures are taken, the person concerned should be protected from unintended negative effects that go beyond the objective of the measures taken.

### 3. REPORTING PROCEDURE

All Disclosures made under this Policy will be reviewed, registered and investigated further to the investigation procedure set out in paragraph 4.

Prior to filing a Disclosure under this Policy an employee has the opportunity to seek (verbal) advice and discuss a Wrongdoing confidentially with their manager, their manager's line manager, a Confidentiality Counselor, the HR Business Partner or a trusted colleague of the employee's choice. If a Wrongdoing is discussed with any of the persons mentioned above, the recipient of the Disclosure can contact the Director Compliance or the External Facilitator without delay for further guidance. Third parties must use the formal process mentioned below.

#### 3.1 Formal internal reporting

A Whistleblower can report a Wrongdoing to the **Director Compliance** through any of the following channels:

- telephone;
- during a (virtual) meeting in person<sup>2</sup>; or
- through the Speak Up Tool, which facilitates (anonymous) reporting through internet, an app or by telephone.

A Whistleblower can report a Wrongdoing to the **External Facilitator** through the Speak Up Tool.

If a Whistleblower submits an anonymous Disclosure through the Speak Up Tool, they will be provided with login details that enable the Whistleblower to log back in the system, review the case and see

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<sup>2</sup> This can be requested by contacting the Director Compliance in person, by e-mail or telephone.

whether any feedback was provided or questions were asked. Anonymous Whistleblowers are encouraged to log in on a regular basis, at least once a month.

When a Disclosure is submitted through the Speak Up Tool, it will be received and followed up by the External Facilitator, in consultation with the Director Compliance, unless the Whistleblower chooses to exclude one of them when submitting a Disclosure.

In the absence of the Director Compliance, or in case the Director Compliance is involved in the Wrongdoing, the External Facilitator or Chief Risk Officer (CRO) is to be contacted. In case (a member of) the Management Board is involved in the Wrongdoing, the Director Compliance or the External Facilitator will contact the chair of the Supervisory Board.

### **3.1.2 External reporting**

In addition to the formal internal channel mentioned above, Whistleblowers can also choose to externally report a Wrongdoing. Please note that FMO strongly encourages Whistleblowers to raise Wrongdoings internally first. By using the formal internal channel, Whistleblowers give FMO the chance to investigate the matter and take appropriate action if needed.

#### Formal external channels

Whistleblowers can externally report a public interest wrongdoing at *het Huis voor Klokkeluiders*. It is also possible to seek external advice from *het Huis voor Klokkeluiders*.<sup>3</sup>

In addition to *het Huis voor Klokkeluiders*, Wrongdoings can also be reported to other external reporting channels. For example:

- the Dutch Central Bank ('DNB');
- the Dutch Authority for the Financial Markets ('AFM');
- the Dutch Data Protection Authority ('AP'); and
- the Netherlands Authority for Consumers and Markets ('ACM').<sup>4</sup>

Please refer the websites of the organizations mentioned above to determine what the appropriate external channel is for the specific case.

#### Public disclosure

It is possible to publicly disclose a wrongdoing. However, please note that such public disclosure can have serious implications for FMO, for the persons involved and possibly also for the Whistleblower himself.

In the event of a public disclosure of a public interest wrongdoing, the Whistleblower is protected by the safeguards as set out in the Dutch Whistleblowers Protection Act, as implemented in this Policy, if they have:

- I. reasonable grounds to believe that the disclosed information about the (suspected) public interest wrongdoing is correct at the moment of public disclosure; and
- II. disclosed the public interest wrongdoing formally, either internally and externally, or only externally, (see above under 'Formal internal channel' and 'Formal external channels'); and
- III. have reasonable grounds to believe that the investigation following such formal Disclosure mentioned under II has insufficient progress.

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<sup>3</sup> <https://www.huisvoorklokkeluiders.nl/>

<sup>4</sup> This list only includes the external channels deemed most relevant for FMO being a financial institution. For the complete list of external reporting channels, please see article 2c of the Dutch Whistleblowers Protection Act.

If one or more of the conditions mentioned under (I), (II) or (III) are not met, the Whistleblower does not have any (legal) protection under the Dutch Whistleblowers Protection Act, as implemented in this Policy.

Furthermore, Whistleblowers are also protected by the safeguards as set out in the Dutch Whistleblowers Protection Act if the Whistleblower has reasonable grounds to believe that the disclosed information about the (suspected) public interest wrongdoing is correct at the moment of public disclosure, and the Whistleblower has reasonable grounds to believe that:

- I. the public interest wrongdoing poses an imminent or manifest danger to the public interest, (e.g. if there is an emergency situation or a risk of irreversible damage); or
- II. in case of an external reporting, there is a risk of retaliation; or
- III. there is a low probability that appropriate action will be taken.

### **3.2 Providing information**

FMO encourages employees and Third parties to speak up as soon as possible. If someone is aware of, or suspects, a Wrongdoing, they should substantiate the Disclosure by providing documents and other details to the extent available to them. Please note that FMO does not expect a Whistleblower to have all relevant information or to be able to prove that the Disclosure is well founded.

The Whistleblower is requested to provide information, documentation and any known details about the event(s) underlying the Wrongdoing, such as:

- the background, history, and rationale for disclosing the Wrongdoing;
- the date of the event(s) or time period in which the (suspected) Wrongdoing occurred;
- the nature of the event(s);
- the name of the person(s) involved in the Wrongdoing;
- (possible) witnesses to the event(s);
- evidence of the event(s), e.g., documents, e-mails, or voice loggings; and/or
- contact details of the reporting person (preferred).

The Whistleblower must meet any reasonable request to (anonymously) clarify any facts and/or circumstances, to provide (additional) information and to cooperate with an investigation. A lack of information can be a reason to decide not to investigate and/or to conclude that the Wrongdoing has no factual basis and/or it is not possible to gather further information because the Disclosure was filed anonymously and the Whistleblower does not respond to questions posted to them through the Speak Up Tool. The Whistleblower is required to keep all information confidential.

The Whistleblower should never investigate the matter themselves and should not seek additional evidence to substantiate the suspected Wrongdoing. The summary of rights and obligations of the Whistleblower and FMO is provided in Annex I.



## 4. INVESTIGATION PROCEDURE

The investigation procedure consists of the following steps:

	Action	Details	Responsible Person	Timeframe
0.	Initial admissibility assessment	<p>Conducting the initial assessment if the complaint is a 'Wrongdoing' and therefore does, or does not, fall under the scope of this Policy.</p> <p>If the complaint is <b>not</b> deemed to be a Disclosure under this Policy, the Director Compliance and/or the External Facilitator should inform the person who made the complaint about this assessment, and, if relevant, redirect that person to the relevant person(s)/channel (e.g. their manager, the Human Resources department or the confidentiality counselor).</p> <p>If the complaint is deemed to be a Disclosure under this Policy, the steps mentioned below should be followed.</p>	Director Compliance/External Facilitator	Directly after receiving the complaint (in any event within seven days)
1.	Reviewing the Disclosure.	The Disclosure will be reviewed in an independent, reliable, and result-oriented way. When a Wrongdoing is disclosed, the Director Compliance or the External Facilitator, depending on how, and to whom, the Disclosure was made <sup>5</sup> , will acknowledge receipt of the Disclosure within seven business days and explain the next steps. <sup>6</sup>	Director Compliance and/or the External Facilitator	Seven days

<sup>5</sup> As mentioned in Section 3.1.1, when a Disclosure is submitted through the Speak Up Tool, it will be received and followed up by the External Facilitator, in consultation with the Compliance Director, unless the Whistleblower chooses to exclude one of them when submitting a Disclosure.

<sup>6</sup> All Disclosures will be investigated if possible. If the Disclosure is not in the scope of this Policy, the person who made the Disclosure will be informed and will be referred to the alternative procedure. Overall criteria to proceed with investigating a Disclosure include:

- assessment of proper use of this Policy;
- first assessment of the reliability of the Disclosure (based on contents of Disclosure), its materiality to FMO and chances that the Wrongdoing will continue or occur again;
- availability of investigation leads;
- timeframe mentioned in the Disclosure;
- option to contact or remain in contact with the Whistleblower for further questions;

		All Disclosures, regardless of how they have been reported, should be registered (anonymously) in the Speak Up Tool.		
2.	Summary of the Disclosure.	The External Facilitator or the Director Compliance, in coordination with the External Facilitator (if required), will make a summary in writing of all facts and circumstances of the Disclosure received. and will provide the Whistleblower with an opportunity to comment on the summary and/or sign-off for agreement to confirm the facts and circumstances in writing. If a Whistleblower made the Disclosure verbally, a full report needs to be drafted (e.g., not only a summary) including all facts and circumstances. This report will be registered in the Speak Up Tool (see also under 1). The Whistleblower should have the possibility to review, correct (if relevant) and approve this report. The Whistleblower will receive a copy of the summary/report.	Director Compliance <sup>7</sup> and/or the External Facilitator	As soon as possible after Action 1.
3.	Informing the CEO.	The CEO will be informed about the Disclosure by the Director Compliance without revealing the identity of the person who made the Disclosure.  In case (a member of) the Management Board is involved in the Wrongdoing the Director Compliance will notify the chair of the Supervisory Board.  In case the Director Compliance is involved in the Wrongdoing, the External Facilitator will notify the Management Board directly, or Supervisory Board if the Management Board is also implicit in the Disclosure.	Director Compliance and/or the External Facilitator	As soon as possible after Action 1.
4.	Gathering of information.	The Director Compliance will gather, document, and analyze preliminary information e.g., from the person who made the Disclosure, open sources, ICT systems (initial investigation), in order to determine the scope and further actions for the main investigation. Depending on the scope of the investigation, information may be collected by means of interviews with people involved in the Disclosure.	Director Compliance and/or the External Facilitator	TBD (case by case basis)

- the ability to protect the identity of the Whistleblower during the investigation procedure; and
- willingness of the Whistleblower to proceed with the investigation process.

<sup>7</sup> Where the Director Compliance is mentioned, the Director Compliance may delegate (part, or all, of the procedure) to a responsible Compliance Officer.

		In case the External Facilitator reports directly to the Management Board and/or Supervisory Board, this step 4 and steps 5-8 below will be completed in coordination with those parties where it otherwise mentions Director Compliance.		
5.	Advice and Assistance.	The Director Compliance will seek appropriate internal and, if deemed necessary, external advice and assistance (including with the External Facilitator) in completing a prompt investigation of the facts. When applicable, a well reputed private investigation firm may be hired.	Director Compliance and/or the External Facilitator	TBD (case by case basis)
6.	Conclusion of findings	The Whistleblower will be informed of the overall findings, i.e., whether FMO has established that a Wrongdoing has taken place, and next steps (if relevant). If it is not possible to inform the Whistleblower within three months since the receipt of the Disclosure about the final outcome of the investigation, the Whistleblower will be informed about this and notified when the final findings can be expected they will be informed. Note, it will not always be possible to give full details of the outcome of a case (or related actions taken) for reasons of confidentiality or privacy, or if it would be detrimental to the investigation or the legal rights of all concerned. Also, if disciplinary action has been taken against an individual this can generally not be shared because of privacy issues, and an investigation by a regulator or law enforcement agency will usually be confidential.	Director Compliance and/or the External Facilitator	Whistleblower updated at least monthly, and the investigation concluded within three months, if possible. (However, substantial feedback will be provided to the reporter to the extent possible within three months after the confirmation of the receipt of the report.)
7.	Response of Whistleblower	The Whistleblower will be given an opportunity to respond to the conclusion (see step 6) and provide any further information if necessary within a certain time frame.	Whistleblower	Within 14 days of Action 6.
8.	Report	The report will be presented to the Management Board (or the chair of the Supervisory Board in case a member of the Management Board is involved)..	Director Compliance and/or the External Facilitator	Immediately following Action 7.
9.	Management summary	On a high level, and without revealing the identity of the person who made a Disclosure, Disclosures will be ad-hoc (at least quarterly) reported to the Compliance Committee and the Supervisory Board. It is the responsibility of the Management Board to take appropriate actions.	Director Compliance and/or the External Facilitator	Quarterly
10.	Works Council summary	A high-level summary will be prepared for the Works Council including the number of reports received in the past year, number of cases closed/still open, the outcome (substantiated, not substantiated, inconclusive) and the category (unwanted behavior, fraud, corruption, conflicts of interest, etc.) without revealing details of the Disclosure.	Director Compliance	Annual, at the end of the calendar year

The report, actions taken, information and supporting documentation will be registered in the Speak Up Tool and retained in accordance with the retention periods prescribed by the Privacy Policy on personal data.

## 5. BREACHES

An employee who breaches this Policy, may be subject to disciplinary actions.

## 6. ROLES AND RESPONSIBILITIES

The CEO of FMO has delegated the task of investigating Disclosures to the Director Compliance and the External Facilitator. The Director Compliance, or the External Facilitator (in case the External Facilitator has conducted the investigation), reports directly to the CEO regarding Disclosures made under this Policy. If a member of the Management Board is involved, the report will be made directly to the chair of the Supervisory Board.

The Management Board of FMO is responsible for implementing this Policy and to ensure that employees and Third parties, as outlined in paragraph 1.2, are aware of the Policy.

## 7. ASSISTANCE

The Whistleblower and/or the accused person(s) (i.e. the person(s) who is (are) the subject of an investigation), may engage an advisor and can be represented by this advisor. Any (external) person who is trusted by the Whistleblower or the accused person(s) can act as an advisor and will be bound by a duty of confidentiality.

In the case the Whistleblower is an employee, and after the Disclosure has been assessed and determined by the Director Compliance to be in scope of the Policy, FMO will make available reasonable financial resources<sup>8</sup> for legal advice (if needed). Invoices, and proof of use of such (legal) advice must be first approved by, and subsequently sent to, the Director Compliance. The final decision about whether the (legal) advice is in scope of the Disclosure and whether the legal advice should be paid by FMO lies with the Director Compliance.

## 8. TRAINING AND AWARENESS

For the Policy to be effective, communication, training and awareness activities must be put in place and must be on-going.

Employees will be informed through introductory presentations, e-learning and FMO's intranet on e.g.:

- the existence of this Policy;
- the goals and scope of this Policy;
- the Speak Up channels (which includes the Speak Up Tool);
- the fact that abusing this Policy may lead to disciplinary actions; and
- the fact that filing a Disclosure in good faith does not lead to disciplinary actions.

It is the responsibility of the Compliance department to ensure that there are adequate and suitable training materials available and that these materials are regularly updated.

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<sup>8</sup> Reasonable financial resources are determined by Compliance, considering the nature of the Disclosure, and are determined on a case-by-case basis (generally, up to a maximum of €2500).

Third parties will be informed through FMO's publicly available website, with links to this Policy and relevant contact details within FMO.

## **9. ENTRY INTO FORCE AND REVIEW OF THE POLICY**

This Policy has entered into force with the consent of the Works Council. This Policy will be updated periodically in accordance with the Compliance Charter. When there are new (international) laws and regulations, best practices, or recurring incidents, this Policy will be updated accordingly. This Policy can only be amended by FMO with the consent of the Works Council.

The applicability of this policy to FMO-IM and any changes to this policy, shall require approval by the Management Board of FMO-IM.

# ANNEX I

## Summary of rights and obligations

	Whistleblower	FMO
<b>Rights</b>	<ul style="list-style-type: none"> <li>• Possibility of anonymous and confidential reporting of Wrongdoings.</li> <li>• Being informed if the Wrongdoing is disclosed (this will only be on a need-to-know basis or when FMO is legally obliged to do so).</li> <li>• Protection against victimization and retaliation.</li> </ul>	<ul style="list-style-type: none"> <li>• Take all necessary actions to (timely) investigate the Disclosure.</li> <li>• Involve external parties in the investigation if deemed necessary (which external party is also subject to the confidentiality requirements as set out in the Whistleblowers Protection Act).</li> </ul>
<b>Obligations</b>	<ul style="list-style-type: none"> <li>• Report Wrongdoings in good faith.</li> <li>• Provide all relevant information and substantiate the Disclosure.</li> <li>• If the Disclosure leads to regulatory or court hearings, the reporting person may be obliged to act as a witness.</li> </ul>	<ul style="list-style-type: none"> <li>• Facilitate a process for anonymous Disclosures.</li> <li>• Respect the confidentiality of the Disclosure.</li> <li>• Protect the Whistleblower against victimization and retaliation.</li> <li>• Investigate each Disclosure objectively and impartially.</li> <li>• Protect accused persons during the investigation process.</li> <li>• Take appropriate disciplinary measures, if required.</li> </ul>