



WHISTLEBLOWER PROTECTION POLICY FOR THE EU

REV: 00000001
03 November 2025

1. PURPOSE

In addition to the Global Whistleblowing and Whistleblower Protection Policy, Crown has implemented a supplementary EU-wide policy to address that employees, officers, directors and suppliers of Crown subsidiaries and affiliates in member states of the European Union (EU) may be entitled to additional protections under the applicable national Whistleblower Protection laws based on the Directive (EU) 2019/1937 on the protection of persons who report breaches of Union law.

2. SCOPE

This Policy applies to all Crown employees – permanent, part-time, fixed-term or temporary, interns, secondees, directors, officers, and contingent workers – (each, a “**Reporter**”). To the extent third parties such as contractors, dealers, suppliers or others report any conduct they believe in good faith qualifies as “Reportable Conduct” pursuant to this Policy, they will also be treated as “Reporters” under this Policy.

3. WHICH ADDITIONAL REPORTING OPTIONS ARE AVAILABLE?

Reporters can submit their report either to the internal reporting office Crown has set up for its EU subsidiaries and affiliates or, if applicable, to the competent external bodies, institutions or other official agencies of the state or federal governments or of the European Union which act as external reporting offices.

Crown's internal reporting office for its EU subsidiaries and affiliates is available via Connect with Crown. If you submit a report via Connect with Crown that concerns a subsidiary or affiliate in an EU jurisdiction, your report will automatically be routed to the competent internal reporting office.

At the Reporter's request, a personal meeting with the members of the internal reporting office can also be arranged. This will be made possible within a reasonable period, usually after seven days at the latest. If a Reporter requests a personal meeting, the conversation will be documented in an audio recording or in minutes if the Reporter agrees to this. The Reporter will be given the opportunity to review the written minutes after they have been prepared and to correct them if necessary. Upon completion, the Reporter confirms that the written minutes are complete and correct by signature or electronic confirmation.

Crown encourages all Reporters to submit reports via the internal reporting channels so that reports can be addressed as quickly as possible, and any breaches can be rectified without delay.

Information on the competent authorities acting as external reporting agents within the EU is provided at the end of section 8, below.

4. WHO OPERATES THE INTERNAL REPORTING OFFICE?

The internal reporting office Crown has set up for its EU subsidiaries and affiliates is operated by Mr Quirin Seitenberger, Manager Internal Audit EMEA, located at Crown Gabelstapler GmbH & Co. KG in Feldkirchen. He will act as Reporting Officer for any reports pertaining to Crown's EU subsidiaries and affiliates and is responsible for receiving and processing such reports. Within the scope of their task, the members of the reporting office act independently, are not bound by instructions from the management of Crown or the concerned Crown subsidiaries or affiliates, and are obliged to maintain confidentiality.

5. NETHERLANDS: TRUSTED ADVISOR TO SPEAK ABOUT SUSPECTED BREACHES OF LAW

Employees of Crown Intern Transport BV may confidentially consult a Trusted Advisor (*Adviseur in Vertrouwen*) about a Reportable Conduct, either

- Mr Erik van Thulden (Erik.VanThulden@Crown.com), internally, or
- De Vertrouwensdienst B.V. (<https://www.devertrouwensdienst.nl/vertrouwenspersoon-spreken/>), an external consultant Crown Intern Transport BV has engaged.

In case of questions, the Trusted Advisor will provide guidance on the requirements of the Dutch Whistleblower Protection and can also submit a report on behalf of the respective employees.

6. HOW ARE REPORTERS AND INDIVIDUALS CONCERNED PROTECTED?

The internal reporting office keeps the identity of the Reporters strictly confidential. Their identity may only become known to the members of the reporting office and the staff assisting them in their work (e.g., bureau and IT staff).

The same applies to the identity of the person(s) concerned or other persons implicated in the report. However, their identity may also become known to persons responsible for further investigation of the report or taking follow-up measures.

NOTICE OF EXCEPTION

The obligation to maintain confidentiality does not apply to Reporters who intentionally or in a grossly negligent manner report incorrect information about Reportable Misconduct. The obligation to maintain confidentiality also does not apply if authorities or courts demand the disclosure of certain information; the Reporters will be informed in advance of the disclosure of their identity unless the respective authority or court has informed Crown that such information would jeopardise the relevant investigations, enquiries, or court proceedings.

7. WHEN WILL REPORTERS RECEIVE FEEDBACK ON THEIR REPORT?

Reporters who make a report to the internal reporting office will receive a confirmation of receipt of their report within seven days at the latest.

They will receive further feedback, in particular on the initiation of an investigation or other possible follow-up measures no later than three months from the acknowledgement of receipt of their report or, if receipt of the report was not acknowledged after seven days, no later than three months and seven days after receipt of their report.

8. THE RIGHT TO REPORT TO THE EXTERNAL REPORTING OFFICES

The Directive (EU) 2019/1937 and its national transposition laws give Reporters the right to use external reporting channels at the competent institutions, bodies or agencies of the European Union, states, or federal governments. These include the external reporting channels of the [European Commission](#), the European Anti-Fraud Office ([OLAF](#)), the European Maritime Safety Agency ([EMSA](#)), the European Aviation Safety

Agency ([EASA](#)), the European Securities and Markets Authority ([ESMA](#)) and the European Medicines Agency ([EMA](#)).

Please note that right to use the external reporting channels exists only if the information about a breach is included in the scope of Directive (EU) 2019/1937 and its national transposition laws and the Reporters have discovered the (potential) breach in the course of their work.

Below you will find, with further information by clicking on the respective link, an overview of the public authorities that are the responsible external reporting offices in the EU Member States where Crown subsidiaries or affiliates are located.

8.1. Belgium

- General competence
 - De federale Ombudsman (*The Federal Ombudsman*)
(<https://www.federaalombudsman.be/nl/klokkenluiders/een-melding-indienen/dien-een-melding-in/meld-een-integriteitsschending-of-inbreuk-op-de-wetgeving>)
 - Le Médiateur fédéral
(<https://www.federaalombudsman.be/fr/lanceurs-dalerte/signalez-une-atteinte-a-lintegrite-ou-une-violation-de-la-legislation>)
 - Der föderale Ombudsmann
(<https://www.federaalombudsman.be/de/whistleblowers/melden-sie-eine-verletzung-der-integritat-oder-einen-rechtsverstoss>)
- Radiation protection and nuclear safety
 - Federaal Agentschap voor Nucleaire Controle (*Federal Nuclear Control Agency*)
(<https://fanc.fgov.be/nl/klokkenluiderswet-doe-een-melding>)
 - Agence fédérale de contrôle nucléaire
(<https://afcn.fgov.be/fr/loi-lanceurs-dalerte-effectuez-un-signalement>)
 - Föderalagentur für Nuklearkontrolle
(<https://fank.fgov.be/de/whistleblower-gesetz-eine-meldung-machen>)
- Social fraud
 - Meldpunt voor een Eerlijke Concurrentie (*Point of Contact for Fair Competition*)
(<https://www.meldpuntsocialefraude.belgie.be/nl/index.html>)
 - Point de contact pour une concurrence loyale
(<https://www.meldpuntsocialefraude.belgie.be/fr/index.html>)
 - Kontaktstelle für ehrliche Konkurrenz
(<https://www.meldpuntsocialefraude.belgie.be/de/index.html>)
- Data protection
 - Gegevensbeschermingsautoriteit (*Data Protection Authority*)
(<https://www.gegevensbeschermingsautoriteit.be/klokkenluiders>)

- L'Autorité de protection des données
(<https://www.autoriteprotectiondonnees.be/citoyen/lanceurs-d-alerte>)
- Consumer
 - Meldpunt voor consumenten (*Contact point for consumers*)
(<https://meldpunt.belgie.be/meldpunt/nl/welkom>)
 - Point de contact pour les consommateurs
(<https://meldpunt.belgie.be/meldpunt/fr/bienvenue>)
 - Meldestelle für Verbraucher
(<https://meldpunt.belgie.be/meldpunt/de/wilkommen>)

8.2. Czech Republic

- General competence
Ministerstvo spravedlnosti České republiky (*Ministry of Justice of the Czech Republic*)
(<https://oznamovatel.justice.cz/>)

8.3. Germany

- General competence
Bundesamt für Justiz (*Federal Office of Justice*)
(https://www.bundesjustizamt.de/DE/MeldestelledesBundes/MeldestelledesBundes_node.html)
- Financial sector
Bundesanstalt für Finanzdienstleistungsaufsicht (*Federal Financial Supervisory Authority*)
(https://www.bafin.de/DE/DieBaFin/Hinweisgeberstelle/hinweisgeberstelle_node.html)
- Antitrust Law
Bundeskartellamt (*Federal Cartel Office*)
(https://www.bundeskartellamt.de/DE/Aufgaben/Kartelle/HinweiseAufKartellverstoesse/hinweiseaufverstoesse_node.html)

8.4. Italy

- Anti-Fraud
Autorità Nazionale Anticorruzione (ANAC) (*National Anticorruption Authority*)
(<https://www.anticorruzione.it/>)

8.5. Netherlands

- General competence
Huis voor Klokkenluiders (*Whistleblowers Authority*)
(<https://www.huisvoorklokkenluiders.nl/onderzoek-door-het-huis>)
- Antitrust and Consumer Law
Autoriteit Consument & Markt (*Authority for Consumers and Markets*)

(<https://www.acm.nl/nl/uw-tip-melding-doorgeven-aan-de-acm#waar-u-kunt-melden-bij-de-acm>)

- Financial sector
 - Autoriteit Financiële Markten (*Authority for the Financial Markets*)
(<https://www.afm.nl/nl-nl/sector/themas/melden-misstanden-en-incidenten>)
 - De Nederlandsche Bank N.V. (*the Central Bank of the Netherlands*)
(<https://www.dnb.nl/contact/bezwaar-klacht-of-misstand-melden/melden-misstanden-financiele-instellingen/>)
- Data protection

Autoriteit Persoonsgegevens (*Data Protection Authority*)
(<https://www.autoriteitpersoonsgegevens.nl/datalek-melden>)
- Healthcare and youth care
 - Inspectie Gezondheidszorg en Jeugd (*Healthcare and Youth Inspectorate*)
(<https://www.igj.nl/onderwerpen/melden-over-uw-werkgever-klokkenluidersregeling>)
 - Nederlandse Zorgautoriteit (*Dutch Healthcare Authority*)
(<https://www.nza.nl/contact/meldpunt>)
- Nuclear Safety and Radiation Protection

Autoriteit Nucleaire Veiligheid en Stralingsbescherming (*Authority for Nuclear Safety and Radiation Protection*)
(<https://www.autoriteitnvs.nl/onderwerpen/overtreding-misstand-melden>)
- Environment and Transport

Inspectie Leefomgeving en Transport (*Environment and Transport Inspectorate*)
(<https://www.ilent.nl/meldformulieren-inspectie-leefomgeving-en-transport>)
- Working conditions

Nederlandse Arbeidsinspectie (*Netherlands Labour Authority*)
(<https://www.nlarbeidsinspectie.nl/onderwerpen/melden>)
- Food and Consumer

Nederlandse Voedsel- en Warenautoriteit (*Netherlands Food and Consumer Product Safety Authority*)
(<https://www.nvwa.nl/onderwerpen/melding-doen>)

8.6. Spain

- General competence

Autoridad Independiente de Protección al Informante (*Independent Authority for Whistleblower Protection*)
[No reference link available yet]
- Anti-Fraud

Servicio Nacional de Coordinación Antifraude (*National Anti-Fraud Service*)
(<https://www.igae.pap.hacienda.gob.es/sitios/igae/es-ES/Paginas/denan.aspx>)

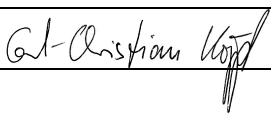
- Taxation
Agencia Tributaria (*Tax Authority*)
https://sede.agenciatributaria.gob.es/Sede/colaborar-agencia-tributaria/comunicaciones-ley-2_2023-proteccion-informante-externo/informacion-ley-2_2023-proteccion-informante-externo.html
- Financial sector
Comisión Nacional del Mercado de Valores (*National Stock Market Authority*)
<https://www.cnmv.es/portal/whistleblowing/presentacion>
- Data protection
Agencia Española de Protección de Datos (*Spanish Data Protection Authority*)
<https://whistleblowersoftware.com/secure/aepd-canal-proteccion-informante/>

9. REVISION HISTORY

Revision Number	Summary of Revisions
1.0	First Issuance of Policy – 03 November 2025

10. AUTHORISATION

WRITTEN BY:

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APPROVED BY:

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