

WEGENER WHISTLEBLOWER REGULATIONS

REGULATIONS ON HOW TO RESPOND TO SUSPECTED WRONGDOING

Article 1

Definitions

In these regulations, the following words or terms have the meanings specified below:

- Employee:** A person working, whether or not in the company's employ, for the company and its subsidiaries.
- The company:** The public company limited by shares, Koninklijke Wegener NV.
- The president of the Board of Directors:** The chairperson of the company's Board of Directors.
- The president of the Supervisory Board:** The chairperson of the company's Supervisory Board.
- Manager:** The direct supervisor of the employee.
- Confidential adviser:** The person appointed by the president of the Board of Directors to act as such for the company and its subsidiaries (= secretary of the Board of Directors).

Complaints Committee:

The committee appointed by the president of the Board of Directors to handle complaints on behalf of the company and its subsidiaries.

Suspected wrong:

- A reasonable suspicion of a work-related:
- (imminent) punishable offence
 - (imminent) infringement of a law or regulation
 - (imminent) deliberate attempt to provide public organisations with false information
 - infringement of the company's code of conduct
 - (imminent) deliberate withholding, destruction or manipulation of information regarding these facts

Article 2

Procedure

- Except when there are grounds for exception, as referred to in Article 4, paragraph 2, employees are to report suspected wrongdoing internally to their manager or, if they consider this inappropriate, to the confidential adviser, or to both.
- Upon request, the manager or confidential adviser records the report in writing, stating the date on which it was received, and has it signed as correct by the employee, who receives a copy of the report. The manager or confidential adviser sees to it that the Complaints Committee is immediately notified

of the suspected wrong and of the date on which it was reported, and that the president of the Board of Directors receives a copy of the written report.

- The Complaints Committee sends a confirmation of receipt to the employee who reported the suspected wrong, referring to the original report. The Complaints Committee will do the same if employees report the suspected wrong to the confidential adviser instead of their manager.
- The Complaints Committee will institute an investigation immediately after being notified of suspected wrongdoing.
- An employee reporting suspected wrongdoing and the person to whom it is reported will handle the report confidentially. Without permission from the Complaints Committee, no information will be provided to third parties inside or outside the company and its subsidiaries. When providing information, the employee's name will not be disclosed and the information will be provided in such a way as to guarantee the employee's anonymity as much as possible.

Article 3

- Within four weeks after being notified, the Complaints Committee will ensure that the employee is informed in writing of its position regarding the suspected wrong and any measures taken.
- If the position is not made clear within four weeks, the Complaints Committee will ensure that the employee is notified when he/she can expect to be informed of its position.

Article 4

Notification of the president of the Supervisory Board

- Employees may report the suspected wrong to the president of the Supervisory Board if:
 - they disagree with the position referred to in Article 3;
 - they have not received notice of this position within the required period, referred to in paragraphs 1 and 2 of Article 3;
 - the term referred to in paragraph 2 of Article 3 is unreasonably long, given the circumstances, and they have lodged an objection to this with the Complaints Committee, but this Committee has not set a shorter, reasonable period in response;
 - the suspected wrong involves a member of the Complaints Committee;
 - there are grounds for exception, as referred to in the following paragraph.



2. There are grounds for exception, as referred to in letter e. of the previous paragraph, if:
 - a. the employee has reason to fear countermeasures in response to the internal report;
 - b. essentially the same suspected wrong was reported before but was not resolved.
3. Upon request, the president of the Supervisory Board records the report in writing, stating the date on which it was received, and has it signed as correct by the employee, who receives a copy of the report.
4. The president of the Supervisory Board sends a confirmation of receipt to the employee who reported the suspected wrong, referring to the original report. If the employee had reported the suspected wrong before, the confirmation of receipt will refer to the original report.
5. The president of the Supervisory Board will institute an investigation immediately after being notified of suspected wrongdoing.
6. An employee reporting suspected wrongdoing and the person to whom it is reported will handle the report confidentially. Without permission from the president of the Supervisory Board, no information will be provided to third parties inside or outside the company and its subsidiaries. When providing information, the employee's name will not be disclosed and the information will be provided in such a way as to guarantee the employee's anonymity as much as possible.

Article 5

1. Within four weeks after being notified, the president of the Supervisory Board will ensure that the employee is informed in writing of the Supervisory Board's position regarding the suspected wrong and any measures taken.
2. If the position is not made clear within four weeks, the president of the Supervisory Board will ensure that the employee is notified when he/she can expect to be informed of the Supervisory Board's position.

Article 6

Legal protection

Any employee who reports suspected wrongdoing in good faith and in compliance with the provisions of these regulations will not be disadvantaged in any way on account of doing so.

Article 7

Effective date

These regulations took effect on 1 March 2005.

Wegener's Whistleblower's Regulations apply to staff of or those working for:

- > Koninklijke Wegener NV
- > Wegener Nederland BV
- > Wegener NieuwsMedia BV
 - Brabants Dagblad
 - Eindhovens Dagblad
 - De Twentsche Courant Tubantia
 - De Gelderlander
 - de Stentor
 - BN/DeStem | PZC
 - Uitgeverij BN/DeStem BV
 - Uitgeverij Provinciale Zeeuwse Courant BV
- > Wegener Huis-aan-huisMedia BV
- > Wegener NieuwsDruk BV (staf)
 - Wegener NieuwsDruk Best
 - Wegener NieuwsDruk Gelderland
 - Wegener NieuwsDruk Twente
 - Wegener NieuwsDruk Nijmegen
 - Wegener NieuwsDruk Brabant
 - Wegener NieuwsDruk West
- > Wegener ICT | Media BV
- > Wegener Facilitair Bedrijf BV
- > Wegener MediaVentions BV