

Q-Concepts Integrity policy

1. Introduction

The current Q-Concepts Integrity policy serves to safeguard a company culture that normalises integrity. The policy as set out below serves in part to prevent the involvement in punishable acts and violations of the law by the accountancy organisation and its employees, which may damage the trust placed in the accountancy organisations and by extension, the reputation upheld by Q-Concepts. The policy is widely propagated by Q-Concepts policy makers and is supported by way of the procedures and relevant subsequent measures described below.

2. Main policy core

Our vision on Integrity

We believe that integrity means we behave in a reliable and decent manner. Integrity is a pillar within the way we do business. Our reputation is always more important than any short-term benefits. We place high value on matters such as impartiality, autonomy and objectivity. We only wish to focus on those clients whose expectations align with our competencies, who appreciate our services and who comply with the correct standards for legitimacy and integrity. Moreover, we stand by our beliefs, even if we are under pressure. It is not merely a simple client issue. Integrity should apply to all actions and behaviours towards our clients, our teams and within our organisation.

The Code of Conduct

The Code of Conduct is entirely specific to our organisation. Those working for Q-Concepts will no doubt have an affinity with what's described in this document already. The Code of Conduct comprises 24 behaviour principles that provide guidance and content for the desired behaviours for working in line with the vision on integrity as described above. The Code of Conduct describes how we are expected to behave and how we do business in diverse circumstances and situations.

Every (future) employee and policy maker is expected to behave respectfully, graciously, honestly and politely towards anyone we meet and deal with; discrimination, bullying or sexual harassment are unacceptable. The existence of a Code of Conduct befits our reputation: we owe it to our high standing. We are a service provider for matters of sustainability, the least that commands is a sound Code of Conduct. Furthermore, the code of conduct offers the option to manage (future) diversity of backgrounds within our organisation: after all, each professional group has its own rules of conduct. There is also a demand from the market for credible organisations. This Code of Conduct underlines our own credibility. Plenty of reasons to explain why we place such high value on our Code of Conduct. The tone of the Code of Conduct has been kept neutral and general deliberately for the simple reason that it is impossible to devise one rule for every single situation. This wouldn't be welcomed either, because our (future) employees are perfectly capable of making responsible considerations independently, and to enlist help from colleagues wherever necessary.

Of course, everyone is personally responsible that their actions come from integrity and professionalism. This includes compliance with this Code of Conduct. (future) Employees and policy makers who violate the Code of Conduct should expect disciplinary measures. This sounds rigorous, but the Code of Conduct is not an opt-in document. Q-Concepts is extremely serious about managing the morals and ethics that are important to the good name of the organisation. The Code of Conduct reiterates what is expected of (future) employees in relation to compliance with the Code of Conduct. At the same time, (future) employees can expect Q-Concepts to provide them with guidance and support for compliance with the Code of Conduct. The Code of Conduct should never turn into a dead letter.

3. Implementation of our policy

We want to safeguard that the Code of Conduct plays an important role in our daily lives, and ensure we are in compliance. Moreover, we should help each other make the right considerations. To this aim, the existing policy makers will discuss, evaluate and sign this Code prior to the first Q-Concepts audit. The Code will then be evaluated annually and updated if necessary. Minutes of this evaluation will be available. New employees will receive a copy of the most recent Code along with their employment contracts and must sign for receipt. When new employees or policy makers join Q-Concepts, the Code is discussed in its entirety with one of the current policy makers or another (future) management employee prior to the new employee starting work.

We will take the following actions to safeguard desired behaviours:

- Commitment from policy makers. This includes, among other things, the existence and regular focus on the code of conduct and Reporting procedure including a careful procedure to process complaints and reports (see below).
- One of the current policy makers will be available for further clarification if there are signals from the organisation about ambiguities in the Code.
- Flagged-up ambiguities will always be clarified and lead to amendment of the Code. These amendments will always be communicated to all employees immediately after being observed.

Complaints and Reporting procedure

At Q-Concepts, we feel it is important to ensure that any malpractices or grievances can be brought to the fore in a safe environment, so that suitable measures can be taken in a timely manner. Our Complaints and Reporting procedure combines the procedure related to complaints about (sexual) harassment, humiliation, discrimination, aggression and/or violence with a procedure for reporting suspicion of business malpractice/suspicion of possible incidents, whereby a so-called confidential advisor can be consulted for advice and support. This confidential advisor is always one of the policy makers. The confidential advisor is appointed by the management team. This appointment is recorded in the minutes.

For processing complaints related to violations that affect our integrity framework, the confidential advisor will create a special Complaints Committee. Upon reporting a complaint, this person is responsible for compiling a team that he/she deems suitable for dealing with the complaint. This team should comprise at least two policy makers. As well as the confidential advisor, a backup confidential advisor is appointed who also takes up the role of formateur of the complaints committee. This is necessary in case the complaint concerns the actions or negligence of the first confidential advisor. All employees of Q-Concepts are informed verbally of the name of the confidential advisor and the backup confidential advisor when discussing this integrity policy at the time of commencing work.

If someone suspects that any law or formal rules of conduct are violated (an incident within the framework of the integrity policy), this person is unreservedly expected to report this. The notification should be in writing, dated and signed. The written report should be submitted to the (backup) confidential advisor in person. Examples of malpractice/grievance that could lead to such a report are fraud, scam/embezzlement, and waste of funds, but also the improper use of company resources or manipulating information. As soon as this unlawful conduct or negligence has or could have serious consequences for Q-Concepts or the financial market as a whole, we can speak of an incident. The common factor for all these matters is that they occur with regard to a client or with regard to Q-Concepts as an employer.

Any person who is in any way involved with the processing/management of a complaint or report within the context of this procedure is subject to strict confidentiality regarding all information he or she takes knowledge of in this position. The committee issues advice to the Q-Concepts management team, who in turn will make a decision. Of course, the party involved receives a copy of the recommendation made by the committee and of the decision made by the Q-Concepts management team. As soon as a complaint or report has been resolved/settled, all parties involved will forward/submit to the confidential advisor all

information and documents that came into their possession during the processing/management of the complaint or report. The counsellor will be responsible for storing the file. The file must contain at least the following details related to the incident:

- the facts and circumstances of the incident
- information on the person(s) involved in the incident
- the measures taken as a result of the incident (article 33, paragraph 1, Bta - Auditors' Organisation Supervision Decree)

Anyone who has a suspicion about a business malpractice and a suspicion of a possible incident, and who does not report this, or deviates from the provisions in this procedure is acting in breach of the Code of Conduct and the integrity policy at Q-Concepts.

Management of identified risks and prevention of repeat occurrences

If a situation has led to the aforementioned, the Q management team will take appropriate measures aimed at managing the risks that arose as a result of the incident and to prevent a repeat occurrence. If necessary, the code of conduct and the integrity policy will be amended, with any amendments clearly communicated to the work organisation.

4. Finally

Q-Concepts satisfies the criteria of a good employer if it acts in accordance with the provisions of this procedure when applicable. The employee who has and reports a possible suspicion of a malpractice and who does not deviate from this Complaints and Reporting Procedure also acts as befits a good employee. In the event the Code of Conduct is violated, disciplinary measures will be taken if necessary, with the worst case scenario being dismissal. This also applies to anyone who instigates or condones a violation or anyone who is aware of a violation and does not take immediate action to report the transgression.