



Speak-Up Policy

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Foreword

At Inalfa, we promote a culture of transparency. We want our employees and business partners to feel comfortable raising questions, dilemmas and concerns regarding the interpretation of or adherence to applicable law(s), Inalfa's Code of Conduct and Supplier Code / Code for Business Partners Inalfa (hereinafter 'Supplier Code'). Creating a transparent and open environment in which concerns or suspicions can be raised without fear of retaliation is essential to preserving our reputation and ability to operate.

To maintain high standards of business conduct, we encourage our employees and business partners to come forward and express concerns about any (possible) violation of applicable law(s), Inalfa's Code of Conduct and Supplier Code, without fear of retaliation. This Speak-Up Policy provides guidance on how you can express your concerns in case of such a (possible) violation.

Should you become familiar with a (possible) violation of applicable law(s), Inalfa's Code of Conduct or Supplier Code, I herewith encourage you to speak-up!

Let us continue making a bright future for everyone by doing the right thing in the right way!

On behalf of the Board of Management of Inalfa Roof Systems Group B.V.

Georges Andary
President & Chief Executive Officer

1. INALFA'S SPEAK-UP POLICY

This Speak-Up Policy provides guidance on how to deal with a (possible) violation of applicable law(s), Inalfa's Code of Conduct and Supplier Code.

This Speak-Up Policy is applicable to Inalfa Roof Systems Group B.V. and its affiliated companies (hereinafter 'Inalfa'). It applies to all employees and interns of and (temporary) workers for Inalfa, regardless of function, position or duration of employment (hereinafter together referred to as 'employees').

Inalfa's business partners are also encouraged to speak-up via this Speak-Up Policy.

Should you have any concerns regarding a (possible) violation of applicable law(s), Inalfa's Code of Conduct or Supplier Code, you are encouraged to speak-up!

This Speak-Up Policy will guide you through the different manners of raising concerns and will define how your concerns will be handled.

1.1. WHAT KIND OF CONCERNS CAN BE REPORTED?

You are encouraged to report concerns regarding a (possible) violation of applicable law(s), Inalfa's Code of Conduct and Supplier Code, such as:

- Fraud;
 - Bribery and improper payments;
 - Money laundering;
 - Wrongdoings¹ = acts or omissions involving the public interest regarding:
 - an (imminent) violation of a statutory regulation or internal rules of Inalfa;
 - an (imminent) danger to public health;
 - an (imminent) danger to the safety of persons;
 - an (imminent) danger to the degradation of the environment;
 - an (imminent) danger to the proper functioning of the public service or an enterprise as a result of improper acts or omissions.
- The public interest is at stake in case the act or omission affects not only personal interests and there is either a pattern or structural character or the act or omission is serious or extensive;
- A violation or a risk of violation of the law², including:
 - public procurement;
 - financial services, products and markets, and prevention of money laundering and terrorist financing;
 - product safety and compliance;
 - transport safety;
 - protection of the environment;
 - radiation protection and nuclear safety;
 - food and feed safety, animal health and welfare;

¹ For the Netherlands, this refers to wrongdoings (*misstanden*) as described in Section 1 of the Dutch Act on the Protection of Whistleblowers (*Wet bescherming klokkenluiders*).

² For the European Union, the European Union law as referred to Section 2 of Directive EU (2019/1937).

- public health;
- consumer protection;
- protection of privacy and personal data, and security of network and information systems.

1.2. “UNDESIRABLE BEHAVIOR” AND OTHER HRM-COMPLIANCE TOPICS

Concerns regarding “undesirable behavior”³ (e.g. harassment, discrimination, aggression, violence, (sexual) intimidation) and other HRM-compliance topics (e.g. related to diversity and inclusion, equal opportunity, remuneration, working conditions, appraisals, career development) are not to be reported via this Speak-Up Policy⁴. You are encouraged to report these concerns via your local HRM department.

1.3. INALFA’S LOCAL CONFIDANTS – NL (DUTCH LAW REQUIREMENT)

In the Netherlands, you can also choose to (informally) consult Inalfa’s internal or external local confidants regarding your concerns. You can consult them on any type of concern you might have. Inalfa’s local confidants are there to listen, advise and provide you with guidance on how to best approach your concerns. The contact details of Inalfa’s local confidants are included in Annex I (EU) to this Speak-Up Policy.

1.4. LOCAL WHISTLEBLOWERS AUTHORITIES – EU (EUROPEAN LAW REQUIREMENT)

In addition, in the European Union, it may be possible to obtain advice from a local Whistleblowers Authority. Contact details of the (general) local Whistleblowers Authorities are included in Annex I (EU) to this Speak-Up Policy.

2. SPEAK-UP REPORTING OPTIONS

It may not always be clear whether a particular action can be considered a (possible) violation of applicable law(s), Inalfa’s Code of Conduct or Supplier Code. Also in those cases we prefer that you report your concerns in good faith, rather than keep them to yourself.

2.1. INFORMAL REPORTING (ONLY FOR INALFA EMPLOYEES)

You are encouraged to discuss your concerns informally first with your manager. This is the fastest way to clear up any misunderstanding and also the best way to ensure a good and open working environment throughout our organization.

Alternatively, you can informally seek help from your local HRM department or Compliance Officer in order to determine whether or not your concerns are compliance related. These functions can provide you with directions on how to best raise your concerns.

If notifying your manager or further support is not reasonably possible or if you receive guidance to formally report your concerns, you can choose to make a formal report.

³ In Dutch: ‘Ongewenste omgangsvormen’.

⁴ If such concerns involve the public interest (and not only personal interests) and if there is a pattern or structural character or the act/omission is serious or extensive, the concerns are to be reported via this Speak-Up Policy.

2.2. FORMAL REPORTING (FOR INALFA EMPLOYEES AND BUSINESS PARTNERS)

2.2.1 SPEAK-UP REPORTING POINT

Your formal report will be taken in by the Speak-Up Reporting Point, consisting of the Compliance Officer and, where applicable, locally appointed Compliance Delegate for reporting in local language. The names and contact details of the Compliance Officer and, where applicable, the locally appointed Compliance Delegate can be found in Annex I (EU), II (NA) and III (CN/AP) to this Speak-Up Policy.

2.2.2. HOW TO FORMALLY REPORT YOUR CONCERN

You can formally report your concerns via one of the below mentioned communications options:

1. In writing by sending an e-mail to the Speak-Up Reporting Point.
2. By phone. Your report during the call will either be recorded or the contents of your report will be confirmed to you in writing. A recording will require your upfront permission. You will receive a copy of the recording or a written confirmation. You will be given the opportunity to review and correct that written confirmation.
3. In a meeting. The meeting will take place upon your request as soon as possible. Your report during the meeting will either be recorded or the contents of your report will be confirmed to you in writing. A recording will require your upfront permission. You will receive a copy of the recording or a written confirmation. You will be given the opportunity to review and correct that written confirmation.

You can formally report your concerns in the English language and, where applicable, in the local language (via the local Compliance Delegate).

You will not be expected to prove the truth of your reported concerns, but you should provide as much detailed information as you can to enable an assessment and investigation of your concerns. Regardless of the communication option you choose, your report should (at least) contain the following information:

- The nature of the reported concerns (e.g. fraud, theft);
- Names, dates, places, witnesses and all other relevant information;
- Documents or other files (e.g. photos, video's, recordings) that support your report.

You may find it helpful to use Inalfa's Speak-Up reporting template. Inalfa's Speak-Up reporting template is attached as Annex IV to this Speak-Up Policy.

2.2.3. WHAT HAPPENS AFTER YOU HAVE REPORTED YOUR CONCERNS?

A confirmation of your report will be sent to you via e-mail within seven calendar days after your report has been received. All reports will be registered in a specific register that will be kept confidential by Inalfa's Compliance Organization.

After reporting, you may be approached for additional information.

After the intake of your formally reported concerns via the Speak-Up Reporting Point, the Compliance Officer will assess if your reported concerns qualify as a (possible) violation of applicable law(s), Inalfa's Code of Conduct or Supplier Code that fall under the scope of this Speak-Up Policy. Based on the outcome of this assessment, the Compliance Officer will determine whether your concerns need to be investigated or dismissed. You will be informed of such decision within twelve weeks after filing your report.

2.2.4. GROUP COMPLIANCE OFFICER/INTEGRITY COMMITTEE

Depending on the nature, urgency and potential impact of your reported concerns, the following may apply:

1. The Compliance Officer will determine whether or not your reported concerns, due to their nature, urgency and/or potential impact, need to be escalated to the Group Compliance Officer;
2. The Group Compliance Officer will assess whether or not your reported concerns, due to their nature, urgency and/or potential impact:
 - a) can be handled by the Group Compliance Officer (investigated/dismissed in line with article 2.2.3); or
 - b) need to be escalated and handled by the Integrity Committee;
3. The Integrity Committee will handle your concerns (investigated/dismissed in line with article 2.2.3).

2.2.5. CONCERNS NOT HANDLED PROPERLY

In case you believe that the Compliance Officer did not handle your concerns appropriately or that an investigation by the Compliance Officer was not performed correctly, the Group Compliance Officer can be contacted (contact details can be found in Annexes I, II and III to this Speak-Up Policy).

In case you believe that the Group Compliance Officer did not handle your concerns appropriately or that an investigation by the Group Compliance Officer was not performed correctly, escalation can take place by contacting the Integrity Committee at integrity.committee@inalfa.com.

3. SAFEGUARDING YOUR POSITION

3.1. CONFIDENTIALITY AND ANONYMOUS REPORTING

Your reported concerns under this Speak-Up Policy will be dealt with in a confidential manner. The persons handling your reported concerns are not allowed to disclose your identity, except in the following cases:

- when you give your permission;
- when they are required to do so by law or by governmental authorities;
- when, in the view of Group Compliance Officer, your reported concerns have been submitted maliciously;
- in the event of an important public interest but only when allowed by law.

In these cases, your identity will only be disclosed to those with a need-to-know. You will be informed about the disclosure, unless this jeopardizes the further investigation of your reported concerns.

Notwithstanding the above, in order to be able to perform the investigation, it may be required to disclose the content of your report to involved persons and the management of Inalfa, at the discretion of the Compliance Organization.

If you wish to report your concerns anonymously, you should report by sending an e-mail to the e-mail address of your local Speak-Up Reporting Point. The e-mail addresses of the local Speak-Up Reporting Points can be found in Annex I (EU), Annex II (NA) and Annex III (CN/AP) to this Speak-Up Policy.

3.2. NON-RETALIATION

You should feel free to report your concerns, without any fear of retaliation.

Anyone who reports a (possible) violation of applicable law(s), Inalfa's Code of Conduct or Supplier Code in good faith will be given protection and shall in no way be put in a disadvantage as a result of the reported concerns.

Inalfa will not tolerate punishment or unfair treatment when concerns are raised in good faith. Punishment or unfair treatment includes, without limitation, a fine, dismissal or a written reprimand. Also the threat of punishment or unfair treatment or an attempt thereto is not allowed.

The protection against punishment or unfair treatment also applies to persons assisting you with regard to your reported concerns (e.g. a confidant, union representative, lawyer) and other involved third parties (e.g. a colleague, your family).

4. SAFEGUARDING THE POSITION OF PERSON(S) REPORTED UPON

4.1. INFORMING THE PERSON(S) REPORTED UPON

The person(s) subject of your reported concerns will be informed as soon as reasonably possible after your report, unless this would jeopardize the investigation of your reported concerns.

4.2. PRIVACY

Inalfa is committed to protect the privacy of all persons involved in a reported concern to the fullest extent possible and in accordance with applicable laws. Any personal data obtained during reported concerns will only be used for the purposes explained in this Speak-Up Policy.

5. MALICIOUS REPORTING

Inalfa takes its Speak-Up procedure and all reported concerns very seriously and expects you to do the same.

The Speak-Up procedure should not be used for:

- Personal disputes;
- Grievances related to individual employee benefits;
- Fraudulent/imprudent allegations.

There are other procedures available for the handling of personal disputes and mentioned grievances. You are encouraged to contact your local HRM department for personal disputes.

Making an intentional false report can lead to serious consequences, including termination of employment. The reporter of an intentional false report may also be held liable for damages and/or harassment suffered by the person(s) affected by the false report.

6. EXTERNAL REPORTING

We strongly encourage you to raise concerns internally through one of the available reporting options. By speaking up internally, you give Inalfa a chance to look into the matter and take appropriate actions (if needed). In that way, we can improve Inalfa together!

Nonetheless we do not intend to withhold you from reporting to authorities⁵.

7. EFFECTIVE DATE AND AMENDMENTS

This Speak-Up Policy is effective as from July 2025 and supersedes any previous Speak-Up Policy as per that date.

Amendments to this Speak-Up Policy will be made from time to time and will be communicated.

8. QUESTIONS?

In case of questions about this Speak-Up Policy, please send an e-mail to compliance@inalfa.com or contact the Compliance Officer.

⁵ In the European Union the list of local (general) Whistleblowers Authorities is attached in Annex I (EU).

ANNEX I - CONTACT DETAILS (PER INALFA EU LOCATION/ENTITY)

Speak-Up Reporting Point:	Members:	Names:	Languages:	E-mail:	Phone:
Inalfa Roof Systems Group B.V.	Compliance Officer	Susanne ten Have	Dutch/English	SpeakUp.NL@inalfa.com	
Inalfa Roof Systems B.V.	Compliance Officer	Susanne ten Have	Dutch/English	SpeakUp.NL@inalfa.com	
Inalfa Development & Support Services B.V.	Compliance Officer	Susanne ten Have	Dutch/English	SpeakUp.NL@inalfa.com	
Inalfa Global Components Management GmbH	Compliance Officer	Susanne ten Have	Dutch/English	SpeakUp.DE@inalfa.com	
	Compliance Delegate	Serife Kapucu	Dutch/German/English		
Inalfa Roof Systems Polska Sp. z o.o.	Compliance Officer	Susanne ten Have	Dutch/English	SpeakUp.PL@inalfa.com	
	Compliance Delegate	Lidia Szocińska	Polish/English		
Inalfa Roof Systems Slovakia s.r.o.	Compliance Officer	Susanne ten Have	Dutch/English	SpeakUp.SK@inalfa.com	
	Compliance Delegate	Lívia Tomčíková	Slovak/English		

Compliance Office:	Names:	E-mail:
Compliance Officer:	Susanne ten Have / Vivianne Coppus (deputy)	compliance.EU@inalfa.com
Group Compliance Officer	Petra de Best	group.compliance@inalfa.com

Integrity Committee:	Members:	E-mail:
Integrity Committee	Georges Andary (President & CEO)	integrity.committee@inalfa.com
	Wendy Broekhoff (CHRO)	
	Petra de Best (Group General Counsel – Head of Legal)	

Local confidants	Name:	E-mail:	Phone:
Location Venray (internal)	Robert van Cruchten	Robert.van.Cruchten@inalfa.com	+31-651-526558
Location Venray (external)	Gimd B.V. – Imark Meewis	m.meewis@gimd.nl	+31-639502314

Local (general) Whistleblower Authorities:
<u>Local Whistleblower Authority in the Netherlands:</u>
Het Huis voor Klokkenuiders - https://www.huisvoorklokkenuiders.nl/
<u>Local Whistleblower Authority in Germany:</u>
Bundeskartellamt - https://www.bundeskartellamt.de/
<u>Local Whistleblower Authority in Poland:</u>
Zespół do spraw Sygnalistów Biura Rzecznika Praw Obywatelskich https://www.gov.pl/web/sygnalisci/dane-kontaktowe
<u>Local Whistleblower Authority in Slovakia:</u>
Úrad na ochranu oznamovateľov - https://www.oznamovatelja.sk/

ANNEX II - CONTACT DETAILS (PER INALFA NA LOCATION/ENTITY)

Speak-Up Reporting Point:	Members:	Names:	Languages:	E-mail:	Phone:
Inalfa Roof Systems, Inc.	Compliance Officer	Eric Mathis	English	SpeakUp.US@inalfa.com	
Inalfa Holding, Inc.	Compliance Officer	Eric Mathis	English	SpeakUp.US@inalfa.com	
Inalfa Roof Systems De México, S. de R.L. de C.V.	Compliance Officer	Eric Mathis	English	SpeakUp.MX@inalfa.com	
Inalfa Roof Systems Services de México, S. de R.L. de C.V..	Compliance Officer	Eric Mathis	English	SpeakUp.MX@inalfa.com	

Compliance Office:	Names:	E-mail:
Compliance Officer:	Eric Mathis / Tina Mors (deputy)	compliance.NA@inalfa.com
Group Compliance Officer	Petra de Best	group.compliance@inalfa.com

Integrity Committee:	Members:	E-mail:
Integrity Committee	Georges Andary (President & CEO)	integrity.committee@inalfa.com
	Wendy Broekhoff (CHRO)	
	Petra de Best (Group General Counsel – Head of Lega & Compliancel)	

ANNEX III - CONTACT DETAILS (PER INALFA CN/AP LOCATION/ENTITY)

Speak-Up Reporting Point:	Members:	Names:	Languages:	E-mail:	Phone:
Inalfa management (Shanghai) Co., Ltd.	Compliance Officer	Joying Tang	Chinese/English	SpeakUp.CN@inalfa.com	
Inalfa Roof Systems (Beijing) Co., Ltd.	Compliance Officer	Joying Tang	Chinese/English	SpeakUp.CN@inalfa.com	
Inalfa Roof Systems (Chongqing) Co. Ltd.	Compliance Officer	Joying Tang	Chinese/English	SpeakUp.CN@inalfa.com	
Inalfa Roof Systems (Guangzhou) Co., Ltd.	Compliance Officer	Joying Tang	Chinese/English	SpeakUp.CN@inalfa.com	
Inalfa Roof Systems (Shanghai) Co. Ltd.	Compliance Officer	Joying Tang	Chinese/English	SpeakUp.CN@inalfa.com	
Yantai Inalfa Roof Systems Co. Ltd.	Compliance Officer	Joying Tang	Chinese/English	SpeakUp.CN@inalfa.com	
Changchun Inalfa FAWSN Roof Systems Co., Ltd.	Compliance Officer	Joying Tang	Chinese/English	SpeakUp.CN@inalfa.com	
Inalfa Roof Systems Korea Ltd.	Compliance Officer	Joying Tang	Chinese/English	SpeakUp.KO@inalfa.com	
Nihon Inalfa Co. Ltd.	Compliance Officer	Joying Tang	Chinese/English	SpeakUp.JP@inalfa.com	

Compliance Office:	Names:	E-mail:
Compliance Officer:	Joying Tang/ Lynn Zhang (deputy)	compliance.CNAP@inalfa.com
Group Compliance Officer	Petra de Best	group.compliance@inalfa.com

Integrity Committee:	Members:	E-mail:
Integrity Committee	Georges Andary (President & CEO)	integrity.committee@inalfa.com
	Wendy Broekhoff (CHRO)	
	Petra de Best (Group General Counsel – Head of Legal & Compliance)	

ANNEX IV - SPEAK-UP REPORTING TEMPLATE

Thank you for sharing your concern with us. We kindly ask you to complete this form and e-mail it to your respective Speak-Up Reporting Point.

1. Personal information

Reporter's Name: _____ or Anonymous

Reporter's Function: _____

Reporter's Employer/Location: _____

Reporter's Phone number: _____

Reporter's E-mail address: _____

2. Report of (possible) serious wrongdoing or malpractice

a. To which of the following areas does your concern relate? *(please check the applicable box(es))*

- Group:
- Fraud
 - Bribery and improper payments
 - Money laundering
 - Conflict of interest
 - Unfair competition
 - Export controls and trade sanctions
 - Responsible sourcing
 - Confidentiality
 - Information security
 - Privacy and data protection
 - Responsible communication
 - Protection of assets and IP
 - Other, namely: _____

b. Which of the following Inalfa entity/entities is/are involved? *(please check the applicable box(es))*

- Group:
- NL: Inalfa Roof Systems Group B.V.
- | Asia Pacific: | China: | Europe: | North America: |
|---|---|---|--|
| <ul style="list-style-type: none"> <input type="checkbox"/> KO: Inalfa Roof Systems Korea, Ltd. <input type="checkbox"/> JP: Nihon Inalfa Co., Ltd. | <ul style="list-style-type: none"> <input type="checkbox"/> Changchun Inalfa FAWSN Roof Systems Co., Ltd. <input type="checkbox"/> Inalfa management (Shanghai) Co., Ltd. <input type="checkbox"/> Inalfa Roof Systems (Beijing) Co., Ltd <input type="checkbox"/> Inalfa Roof Systems (Guangzhou) Co., Ltd <input type="checkbox"/> Inalfa Roof Systems (Shanghai) Co., Ltd. <input type="checkbox"/> Yantai Inalfa Roof Systems Co., Ltd. | <ul style="list-style-type: none"> <input type="checkbox"/> NL: Inalfa Development & Support Services B.V. <input type="checkbox"/> DE: Inalfa Global Components Management GmbH <input type="checkbox"/> NL: Inalfa Roof Systems B.V. <input type="checkbox"/> PL: Inalfa Roof Systems Polska Sp. z o.o. <input type="checkbox"/> SK: Inalfa Roof Systems Slovakia s.r.o. | <ul style="list-style-type: none"> <input type="checkbox"/> USA: Inalfa Holding, Inc. <input type="checkbox"/> MX: Inalfa Roof Systems Services de Mexico, S. de R.L. de C.V. <input type="checkbox"/> MX: Inalfa Roof Systems de Mexico, S. de R.L. de C.V. <input type="checkbox"/> USA: Inalfa Roof Systems, Inc. |

c. When did the (possible) violation occur? _____

d. Where did it occur (e.g. department, country, location)? _____

e. When did you become aware of the (possible) violation? _____

f. How did you become aware of the (possible) violation? _____

g. Which people are involved? _____

h. Did you informally report your concern to your manager? _____

i. Did you discuss your concern with others? _____

j. Other details/information that might help the investigation or might otherwise be useful to know?

3. Detailed description of concern

Please describe your concern in detail below:

4. Relevant documents/evidence

Please attach relevant documents/evidence that support your concern to this form.

We thank you for sharing your concern with us. Please send this form (including possible attachments) to your respective Speak-Up Reporting Point as mentioned in Inalfa's Speak Up Policy.

We will confirm receipt of your formal report via e-mail within seven calendar days. Know that the information you provide in your report will be dealt with in a confidential manner. After the intake of your reported concerns by the Speak-Up Reporting Point, the Compliance Officer will assess if your reported concerns qualify as a (possible) violation of applicable law(s), Inalfa's Code of Conduct or Inalfa's Supplier Code / Code for Business Partners. Based on the outcome of this assessment, the Compliance Officer will determine whether your concerns need to be investigated or dismissed. You will be informed of such a decision within twelve weeks after filing your report.

Group Compliance Office