



Summary of

Whistleblowing policy

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LYNX B.V.

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Introduction

LYNX requires anyone working for the organization to observe high standards of business and personal ethics in the conduct of their duties and responsibilities, as described amongst others in its **Code of Conduct**. As employees and representatives of LYNX, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations. This Whistleblowing Policy (hereinafter “Policy”) is intended to encourage and enable employees and others to raise serious concerns internally so that LYNX can address and correct inappropriate conduct and actions. We wish to encourage a culture of openness and it is in all our interests to ensure that any misconduct does not occur. In the event the provisions of this policy are contrary to local laws or regulations, the latter prevail.

Scope of the Policy

Who can make a report?

This policy applies to any (former) employee, applicant and any person who performs or performed work for any LYNX office, regardless of whether or how this is contractually arranged.

What can be reported?

This policy provides for an internal procedure for any such person that reports, or intends to report, a (suspicion of) a misconduct based on reasonable grounds and information acquired in the contact of his or her work-related activities. **Misconduct** includes, but is not confined to:

- An act or an omission likely to prejudice the standing of LYNX
- Criminal offences or failure to comply with a legal provision
- A miscarriage of justice
- Endangerment of the health and safety of any person
- Environmental damage
- A threat to the functioning of the company (any failure to comply with LYNX internal rules)
- The deliberate concealment of any misconduct.

The misconduct should be directly related to LYNX or any of its related parties.

Your rights if you report

Advice

You are allowed to consult an advisor to obtain advice on how to proceed after a suspicion of misconduct has arisen. The advisor is obliged to keep all information confidential. The advisor is determined on case to case basis under cooperation between Whistleblower and LYNX, as a suitable advisor depends on the specific situation.

No Retaliation

You are protected in making a disclosure to LYNX when in your reasonable belief one or more of the above misconduct has been committed, is being committed or is likely to be committed. If this is the case, we will take all reasonable steps to ensure that you suffer no detriment, retribution, harassment, victimisation or other mistreatment from LYNX. If you raise a misconduct concern, you will be taken seriously and will be treated fairly and justly by LYNX. We will take all reasonable steps to ensure that no person under our control engages in victimization in any form and disciplinary action shall be taken against anyone who engages in retaliation.



The abovementioned protection also applies if the suspicion of misconduct turns out to be incorrect, unless it regards a report with deliberate incorrect or misleading information. Disciplinary action, including termination of employment, may be taken against anyone deliberately raising false and malicious allegations.

Further, the protection also applies to the advisor consulted by you and third persons who are connected with you and who could suffer retaliation in a work-related context, such as relatives.

Confidentiality

LYNX will treat the report confidentially. Anyone who obtains information on a suspicion of misconduct, person who made the report and/or the person who is allegedly responsible for the misconduct will keep this information confidential, unless disclosure is required under applicable law, in the context of further investigations or subsequent court proceedings.

Data Protection

Any processing of personal data carried out pursuant to this Policy, including the exchange of personal data with the competent authorities, shall be carried out in accordance with Regulation (EU) 2016/679 (GDPR). Personal data which are manifestly not relevant for the handling of a specific report shall not be collected or, if accidentally collected, shall be deleted without undue delay.

Internal report

Reporting channel

If you have a misconduct concern, you should inform a dedicated receiving person which could be **local Legal** or **local Branch Management** in your country.

Contact details are presented in the Annex.

Reporting requirements

The reporting can be done in writing, by mail, by phone or through the Whistleblowing tool. Upon request by the reporting person LYNX also offers reporting by means of physical meetings, within a reasonable timeframe.

Follow up

The reporting person receives an “**acknowledgment of receipt**” of the report from the receiving person within seven days of the report (unless the reporting happened anonymously).

Two of the people mentioned in Annex 1 will follow-up on the report as quickly as possible. The accuracy of the report will be assessed and, where relevant the breach reported will be addressed (e.g. by starting an investigation). Feedback on the assessment of the report and, if applicable, what further actions are taken or envisaged, will be provided to the reporting person at the latest three months from the acknowledgment of receipt. If it is decided that the suspicion of misconduct will be investigated further, due to confidentiality reasons the reporting person will not be informed about the results of the investigation until the investigation is completed. The reporting person will receive regular updates on the progress of the investigation. Upon completion of the investigation, the reporting person will be informed that the investigation has been completed and whether measures have been taken.

If the reporting person does not agree with the follow-up given or the outcome of the investigation, he or she can submit a report explaining why this is the case. Any concerns will be taken into consideration by LYNX.

Record keeping

Upon receipt of a report of a suspicion of misconduct, the receiving person shall register the report and information on the suspicion in the relevant register.

External report

The reporting person can raise concerns externally to the relevant external reporting channel, especially if he/she cannot reasonably be required to follow the internal channel set out above first. The availability of external reporting channels depends on the country. Situations in which you could consider an external report include, but are not limited to:

- A statutory obligation
- Immediate danger, where a significant and urgent public interest necessitates an immediate external report
- A reasonable suspicion that the ultimate responsible person within LYNX is involved in the suspected wrongdoing
- An earlier report about the same concerns made in accordance with the internal procedure that did not put an end to the wrongdoing.

An external disclosure should always be suitable and proportionate.

ANNEX 1 – Internal contact persons and external channels

Available receiving person	Function	Contact
	Compliance Netherlands	f.verdonk@lynx.nl
	Legal Czech Republic	j.cermakova@lynxbroker.cz
	Legal Belgium	m.savaete@lynx.be
	Legal Germany	p.gruber@lynxbroker.de
	Branch representative Netherlands	s.vanlandewijk@lynx.nl
	Branch representative Germany	c.schoeneberg@lynxbroker.de
	Branch representative Belgium	b.huys@lynxbroker.be
	Branch representative Czech Republic	j.mlynek@lynxbroker.cz

All LYNX employees can consult external channels in the Netherlands. LYNX is monitoring and will update the policy if local external channels apply.

Available external channel Netherlands	Contact

Authority for Consumers & Markets (Autoriteit Consument en Markt)	https://www.acm.nl/nl/contact/tips-en-meldingen/tip-ons Or anonomously : tel:+31707222500
Authority for the Financial Markets (Autoriteit Financiële Markten)	https://www.afm.nl/nl-nl/contact/contactformulier-consumenten
Dutch Data Protection Authority (Autoriteit Persoonsgegevens)	https://autoriteitpersoonsgegevens.nl/nl/meldingsformulier-klachten
De Nederlandsche Bank N.V.	https://www.dnb.nl/en/contact/reporting-complaints-and-wrongdoing/reporting-integrity-incidents-at-financial-institutions/form-dnb-integrity-reporting-desk/
House for whistleblowers	www.huisvoorklokkenluiders.nl

Other, less relevant, available external channels are:

Available external channel Netherlands	Contact
Inspectorate for Health and Youth Care (Inspectie gezondheidszorg en jeugd)	088 120 5000
Dutch Healthcare Authority (Nederlandse Zorgautoriteit)	https://www.nza.nl/contact/meldpunt
Authority for Nuclear Safety and Radiation Protection (Autoriteit Nucleaire Veiligheid en Stralingsbescherming)	https://www.autoriteitnvs.nl/onderwerpen/overtreding-misstand-melden