

Speaking Up

Our SpeakUp Policy is part of the Vopak Code of Conduct.

First and foremost

At Vopak we are committed to responsible business practices, and always acting in accordance with the Vopak Code of Conduct and respective relevant laws and regulations. We want to behave with integrity and treat others with respect. During your work, you may be confronted with ethical concerns or dilemmas. If you observe something that worries you, or that seems to violate the Vopak Code of Conduct, we expect you to speak up to help us address the situation.

We understand that it takes courage to speak up, so we are committed to providing you with an easy and safe way to raise your concerns. Speaking up is an essential process that enables us to protect our people, our company values, our stakeholders and society as a whole. In this document (our SpeakUp Policy) we clearly explain what your options are and how you can raise your concerns.

Scope

This SpeakUp policy describes how you can speak up about suspected breaches of the Vopak Code of Conduct. Furthermore, it describes the process, so that you know what to expect when speaking up (confidentiality, anonymity, non-retaliation). The SpeakUp policy applies to all employees, value chain workers including contractors, and other stakeholders.

When do I speak up?

As soon as possible, or as soon as you suspect that there has been a violation of the Code of Conduct or company values. We do not expect you to have all the answers. We encourage you to use what is described in this policy as a reference point to determine if something is not right.

What should I speak up about?

We encourage you to speak up about suspected breaches of the Code of Conduct, or, when in doubt, about anything that does not constitute ethical, compliant or lawful behavior.

How do I speak up?

You can speak up, provide feedback or ask your questions in a variety of ways. For many matters, it can be a good first step to talk to the person involved directly. Thus, speaking up should not replace the direct dialogue that forms the foundation of our transparent company culture. However, we recognize that this is not always easy to do.

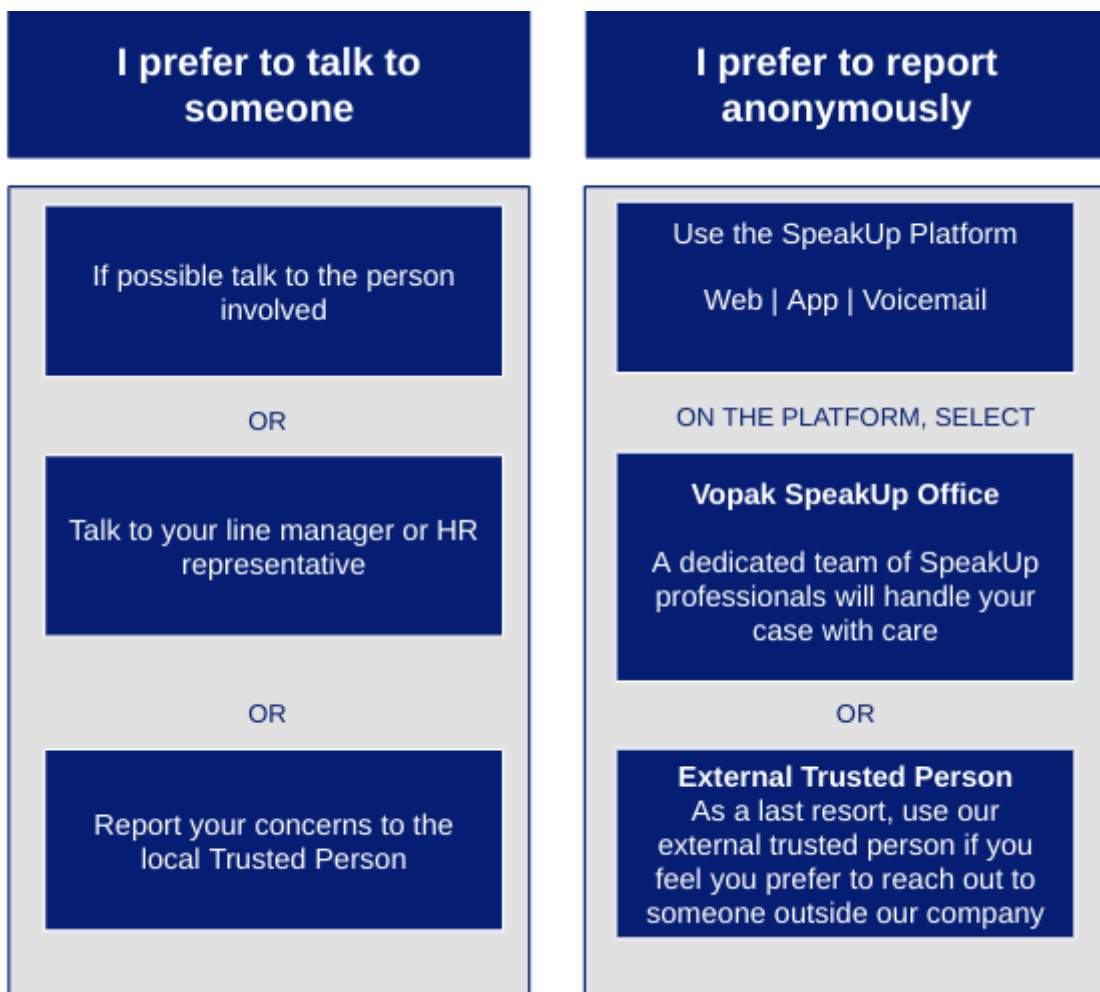
If this is not possible, or if you do not feel comfortable doing so, please turn to the SpeakUp channels as described below¹:

1. Speak up to your manager or your manager's manager.
If this is not possible, or you do not feel comfortable doing so,
2. Speak up to your local HR Manager.
If this is not possible, or you do not feel comfortable doing so,
3. Seek advice from your Local trusted person
If this is not possible, or you want to speak up regardless,
4. Speak up via the "Vopak SpeakUp" platform. The platform will offer the option to either speak up to the Vopak SpeakUp Office or alternatively if this is not possible or

¹ If you are a contractor value chain worker, or other stakeholder, you can move straight to step 4.

if you are not comfortable doing so, speak up to an external trusted person at KPMG.

In the [Contact details & Useful Links](#) section at the end of this document you will find all relevant practical details on how to access the Vopak SpeakUp platform, as well as contact details of the Local trusted persons



The Vopak SpeakUp platform is available 24/7. Via this platform you can speak up or ask questions directly to the Vopak SpeakUp Office based at the Vopak headquarters in Rotterdam. At our SpeakUp Office, we have highly qualified and trusted Vopak specialists handling reports. You can speak up in your own language, via phone, via the app, or via

the internet. Our qualified Vopak specialists will handle your report within Vopak. You can decide to remain anonymous.

I spoke up. Now what?

If you submit a report in the SpeakUp platform, you will receive an acknowledgement of receipt within seven days. Your report will be evaluated and assessed by one of our specialists, and the appropriate course of action will be determined. Sometimes you will be asked follow-up questions. You will receive feedback within (ultimately) three months after the acknowledgement of receipt. You will be informed on the status of the report.

Please note that Vopak may not always be able to give you details of the outcome of the investigation for reasons of confidentiality, privacy and the legal rights of the involved parties. All parties involved, including the accused, are entitled to confidentiality. Therefore, if you participate in or learn about an investigation, we ask you to keep the matter confidential.

Please note that not all issues raised will automatically lead to a formal investigation. Sometimes following another course of action is better for all parties involved (e.g. mediation). Furthermore, sometimes there is insufficient information for an adequate investigation to take place and there is no possibility of obtaining further information.

Appropriate measures

If your concern is well-founded (i.e. misconduct or irregularities have indeed taken place), appropriate measures will be taken where necessary in accordance with the law and/or our Disciplinary Policy, where applicable. These measures could include involving external regulatory authorities, inspections or the police. If appropriate measures are taken, you will be informed.

Furthermore, where applicable the investigation report will include recommendations of measures that management can take in order to prevent recurrence of the misconduct or

irregularities in the future, and information to what extent management has agreed to these recommendations. In such cases and within 6 months after the investigation report is completed, Global Internal Audit will conduct an assessment whether the remedy provided is effective.

Protecting you, speaking up

Protecting your right to speak up is essential. Protecting you as a reporter is one of the main purposes of this policy. Below, some key principles are highlighted:

Confidentiality

All questions and issues you raise will be kept confidential. We'll only share information on a strict need-to-know basis and after we've gotten your permission. Depending on the purpose of sharing, the Vopak SpeakUp Office will (further) anonymise the information prior to starting the investigation. Information will only be shared outside of this group if required to do so by law or an important public interest is at stake.

Regardless of all measures taken to protect your confidentiality, it can never be fully guaranteed that in the course of an investigation you will never be implicated by subjects. At any point in the process you can request Vopak to halt the investigation.

Solid Investigation procedures

The Vopak SpeakUp Office is responsible for solid, confidential and precise fact-finding. Procedures are in place.

Anonymous

You can share information anonymously by using one of the SpeakUp channels. The Vopak SpeakUp Office has – in addition – also the responsibility to anonymise any information that comes in, in order to protect your identity. Each of the SpeakUp channels makes safe dialogue possible in an anonymous way.

Safeguarding your Privacy

Vopak is committed to protecting the privacy of everyone involved in the SpeakUp process. We will do everything within reason to safeguard personal data from unauthorized access and processing. Any personal data obtained will be processed in line with our privacy policy and will only be used for the purposes explained in this policy or to comply with the law or an important public interest.

Non-retaliation

We encourage speaking up and any person that speaks up is protected. The right of non-retaliation is guaranteed under the Code of Conduct and violation of this right will not be tolerated. Any form of threat or retaliation aimed at those speaking up may lead to disciplinary measures and we will do our utmost to counter adverse effects of retaliation on all individuals who speak up. If you notice or experience any retaliation, you can report this via one of our SpeakUp channels.

Protecting you, as the accused

A person who is subject to a concern also needs our utmost protection. The presumption of innocence is a leading principle. The SpeakUp Office is responsible for protecting the rights of anyone who is accused - or otherwise involved – in any issue.

Confidentiality

All questions or issues raised are treated confidentially. Information will only be shared on a strict need-to-know basis. Information will only be shared outside of this group if we are required to do so by law or an important public interest is at stake. Your identity will not be disclosed.

Solid Investigation procedures

The SpeakUp Office is responsible for solid, confidential and precise fact-finding.

Procedures are in place to make sure this is achieved.

Information Rights

When a person is officially under investigation, they need to be notified about this fact as soon as possible, unless there is a substantial risk of destruction of evidence and/or an impediment to the investigation.

Right to Defend and Appeal

After the facts are determined, the accused receives an opportunity to not only give a statement (responding to the accusations) but also have the right to comment on the draft findings.

Speakup: a Dialogue

Vopak selected the SpeakUp platform as it allows for anonymous dialogue with the reporter. The Vopak SpeakUp Office has the right not to proceed with a case due to limited information.

The Vopak SpeakUp Office

The Vopak SpeakUp Office consists of qualified professionals from Vopak.

The Vopak SpeakUp Office is responsible for the execution of this SpeakUp policy and the handling of questions and SpeakUp reports. All reports coming in through the SpeakUp channels as set out in this Policy and all reports via other channels of Vopak will be made available to the Vopak SpeakUp Office. The Vopak SpeakUp Office registers, monitors and is responsible for solid, confidential and precise fact-finding. Procedures are in place to ensure this.

The Vopak Senior Vice-President Internal Audit leads the SpeakUp Office and is accountable for the SpeakUp policy overall. He/she has a direct escalation line towards the Chairman of the Audit Committee of the Supervisory Board of Vopak. All members of the Vopak SpeakUp Office are protected against retaliation themselves.

The Vopak SpeakUp Office will provide a (anonymized) report to the Audit Committee of the Vopak Supervisory board. Explicitly included in the report are issues raised on non-retaliation and complaints on the handling of the issue by the SpeakUp Office.

Misuse of the policy

We take the practice of reporting in bad faith or any other form of misuse of this policy seriously. This act is considered to be a serious breach of the Code of Conduct and disciplinary actions will be taken.

Not satisfied with the SpeakUp process

If you believe your concern has not been handled in accordance with this policy, if you are not satisfied with the follow-up and/or the outcome of your report, or if you do not feel protected, please report this directly to the SpeakUp Office through the SpeakUp platform.

Contact details & Useful Links

SpeakUp Channels

Web	https://vopak.speakup.report/speakup 	See How to Leave a Report for detailed guidance
Phone	Organization code: 118382	Country Tel. Number
App		See How to Leave a Report for detailed guidance

Contact details

Speak Up Office

Ard Huisman	Senior Vice-President Internal Audit, head of Vopak SpeakUp Office	ard.huisman@vopak.com
Annunziata Tripodi	SpeakUp Officer	annunziata.tripodi@vopak.com
Olivier Swart	SpeakUp Officer	olivier.swart@vopak.com
Cor Bom	SpeakUp Officer	cor.bom@vopak.com

BU Local trusted persons

BU US & Canada	Natiesha Walker	natiesha.walker@vopak.com
BU North Latin America	Georgyana Hernandez	georgyana.hernandez@vopak.com
BU Brazil	Fernanda Souto	fernanda.souto@vopak.com
BU Netherlands Westerlaan Office	Feikje Wittermans	feikje.wittermans@vopak.com
	Paul Vogelzang	paul.vogelzang@vopak.com
	Lisette Kraaijeveld	lisette.kraaijeveld@vopak.com
BU Singapore	Joann Goh	joann.goh@vopak.com
BU Asia & Middle East	Alexis Oh	alexis.oh@vopak.com
BU China & North Asia	Whitney Wu	whitney.wu@vopak.com
BU Belgium	Inne Hendrix	inne.hendrix@vopak.com
BU South Africa	Nontobeko Mhlongo	nontobeko.mhlongo@vopak.com

Title:	Vopak Speak-Up Policy
Policy Owner:	Senior Vice-President Internal Audit
Approved by:	Executive Board (responsible for the Speak Up programme)
Approval Date:	October 2024
Next review date:	October 2025