Docusign Envelope ID: 4B6B92CF-BAE9-815D-81D2-4C6F9CB5EB49

Policy Title:	**Whistleblowing Policy**
Policy Owner:	**Chief Legal Officer**
	Chief Human Resources Officer
Implemented:	**31 May 2024**
Revised Date:	**November 2026**

NEP Whistleblowing Policy

1. Policy Statement

1.1 NEP Group Inc (NEP) and all of its affiliates and subsidiaries (together, "NEP") is committed to conducting its business with honesty and integrity, and it expects all respective officers, directors, employees and in-house contractors (together, "Personnel") to maintain high standards generally and act in accordance with our Code of Ethics and Business Conduct Policy, NEP policies or any local code of conduct. However, a culture of openness and accountability is essential in order to prevent wrongdoing occurring and to address it if it does occur.

1.2 The aims of this policy are:

(a) To encourage staff to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.

(b) To provide staff with guidance as to how to raise those concerns.

(c) To reassure staff that they should be able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

1.3 This policy covers all Personnel. This policy does not form part of any employee's contract of employment and we may amend it at any time.

2. Personnel responsible for the policy

2.1 The Chief Legal Officer and Chief Human Resources Officer have overall responsibility for this policy, and for reviewing the effectiveness of actions taken in response to concerns raised under this policy.

2.2 All Personnel are responsible for the success of this policy and should ensure that they use it to disclose suspected danger or wrongdoing as detailed in sections 3 and 4 below.

Docusign Envelope ID: 4B6B92CF-BAE9-815D-81D2-4C6F9CB5EB49

3. What is whistleblowing?

3.1 **Whistleblowing** is the disclosure of information which relates to suspected wrongdoing or dangers at work. This may include:

(a) criminal activity;

(b) fraudulent activity;

(c) failure to comply with any legal or professional obligation or regulatory requirements;

(d) danger to health and safety;

(e) bribery or a breach of our Bribery Policy;

(f) a breach of competition law or our Competition Law Policy;

(g) a breach of our Code of Ethics and Business Conduct;

(h) a breach of our Anti-Harassment, Retaliation and Discrimination Policy;

(i) facilitating tax evasion;

(j) a breach of our group or local policies and procedures or codes of conduct;

(k) conduct likely to damage our reputation;

(l) conduct that you would consider unethical;

(m) unauthorised disclosure of confidential information;

(n) the deliberate concealment of any of the above matters.

3.2 A **whistleblower** is a person who raises a genuine concern relating to any of the above. If you have any genuine concerns related to suspected wrongdoing or danger affecting any of our activities (a **whistleblowing concern**) you should report it under this policy.

3.3 If you are uncertain whether something is within the scope of this policy, you should seek advice from the Whistleblowing Officers Craig Betler (HR) or David Leadbetter (Legal).

4. Raising a whistleblowing concern

4.1 We hope that in many cases you will be able to raise any concerns with your line manager or local management. You may tell them in person, follow local procedures or put the matter in writing if you prefer. They may be able to agree a way of resolving your concern quickly and effectively. In some cases, they may refer the matter to the Whistleblowing Officers, Chief Legal Officer or Chief Human Resources Officer.

4.2 Where the matter is more serious, or you feel that your line manager or local management have not addressed your concern, or you prefer not to raise it with them for any reason, you should contact one of the following:

Docusign Envelope ID: 4B6B92CF-BAE9-815D-81D2-4C6F9CB5EB49

(a) The Whistleblowing Officers, Craig Betler (HR) or David Leadbetter (Legal).

(b) Chief Legal Officer **OR** Chief Human Resource Officer.

4.3 If you do not feel comfortable with these options or wish to remain anonymous, you may report your concerns anonymously and communicate with NEP via SpeakUp, available 24 hours a day and hosted by an independent third party. This hotline can be reached +1 (669) 288 7154 (or any of the local numbers listed in annex A to this Policy) using access code '114580' via https://nep.speakup.report/nep .

5. Confidentiality and Data Protection

5.1 We hope that staff will feel able to voice whistleblowing concerns openly under this policy with their line manager or local management.

5.2 Whistleblowers who are concerned about possible reprisals from their line manager or local management should feel confident that they may:

(a) come forward to the Chief Legal Officer, Chief Human Resources Officer or Whistleblowing Officers under section 4.2 and appropriate measures can then be taken to preserve confidentiality.

(b) make an anonymous report by using SpeakUp as set out in 4.3.

5.3 NEP, SpeakUp and any assigned investigators will treat all information received in strict confidence. The privacy of both the messenger and the subject(s) in the reports will be protected as far as is possible if the report is made in good faith and NEP is not compelled to disclose it under law.

5.4 This policy relies on the processing of personal data. For more information on how NEP complies with data protection laws please refer to the NEP Data Protection Policy.

6. Investigation and outcome

6.1 Once you have raised a whistleblowing concern, the Whistleblowing Officers, Chief Legal Officer or Chief Human Resource Officer will carry out an initial assessment to determine the scope of any investigation.

6.2 In some cases, we may appoint an investigator or team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter or local employees. The investigator(s) may make recommendations for change to enable us to minimise the risk of future wrongdoing.

6.3 We will aim to keep you informed of the progress of the investigation, and its likely timescale, either directly or via SpeakUp if anonymous. However, sometimes the need for

Docusign Envelope ID: 4B6B92CF-BAE9-815D-81D2-4C6F9CB5EB49

confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

6.4 If we conclude that a whistleblower has made false allegations maliciously, the whistleblower may be subject to disciplinary action.

6.5 If we consider that the matter reported under section 4.2 or 4.3 is more appropriate for a local grievance procedure, we may suggest that it is pursued by you in that way instead. We will preserve the confidentiality of your report in this circumstance.

6.6 NEP reserves the right not to investigate a matter raised under this Policy by a whistleblower.

7. External disclosures

7.1 The aim of this policy is to provide an internal mechanism for reporting, investigating and remedying any wrongdoing in the workplace. In most cases you should not find it necessary to alert anyone externally.

7.2 The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. It will very rarely if ever be appropriate to alert the media. We strongly encourage you to seek advice before reporting a concern to anyone external.

7.3 Whistleblowing concerns usually relate to the conduct of our staff, but they may sometimes relate to the actions of a third party, such as a customer, supplier or service provider. We encourage you to report such concerns internally first.

8. Protection and support for whistleblowers

8.1 It is understandable that whistleblowers are sometimes worried about possible repercussions. We aim to encourage openness and will support staff who raise genuine concerns under this policy, even if they turn out to be mistaken.

8.2 Whistleblowers must not suffer any detrimental treatment as a result of raising a genuine concern. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Whistleblowing Officers immediately.

8.3 You must not threaten or retaliate against whistleblowers in any way. If you are involved in such conduct you may be subject to disciplinary action.

Docusign Envelope ID: 4B6B92CF-BAE9-815D-81D2-4C6F9CB5EB49

9. Approval

Approval for initiation of this Policy has been given by:

Signed by:
FEDC4C47C9544FA...

Chief Executive Officer — November 19, 2026
Date

DocuSigned by:
Dean Naccarato
FAE522F52CBC4D9...

Chief Legal Officer — November 20, 2026
Date

Signed by:
Julie Bellani
151D237994864E2...

Chief Human Resources Officer — November 19, 2026
Date

Docusign Envelope ID: 4B6B92CF-BAE9-815D-81D2-4C6F9CB5EB49

Annex A – Speak UP local contact details

Country	Phone Number and any additional notes	Code
Australia	Number: +61 2 8284 6262 Call charged at local rate	114580
Austria	Freephone: 0800 909 683	114580
Belgium	Freephone: 0800 89 326	114580
Canada	Number: +1 (514) 395 0496 Call charged at local rate	114580
China	Freephone (via China Telecom): 1080 0152 3042	114580
China	Freephone (Via China United Network): 1080 0852 2221	114580
China	Country wide number with no supplier restriction: 400 120 1842 Call charged at local rate.	114580
Denmark	Number: +45 43 31 09 61 Call charged at local rate	114580
Fiji	Freephone: 008 002 650	114580
Finland	Freephone: 0800 392 912	114580
France	Freephone: 080 554 3753	114580
Germany	Freephone: 0800 1818 952	114580
Hong Kong	Number: +852 3019 4193 Call charged at local rate	114580
India	Freephone: 0008 0005 03159	114580
Ireland	Freephone: 1800 800 636	114580
Italy	Freephone: 800 147 694	114580
Japan	Number: +81 3 6627 0734 Call charged at local rate	114580
Korea, the Republic of	Number: +82 2 3700 5146 Call charged at local rate	114580
Luxembourg	Number: +352 342 080 8982 Call charged at local rate	114580
Netherlands	Number: +31 10 700 75 03 Call charged at local rate	114580
New Zealand	Number: +64 9 913 5892 Call charged at local rate	114580

Docusign Envelope ID: 4B6B92CF-BAE9-815D-81D2-4C6F9CB5EB49

Norway	Number: +47 24 14 06 01 Call charged at local rate	114580
Portugal	Freephone: 800 831 302	114580
Saudi Arabia	Freephone: 800 850 1433	114580
Singapore	Number: +65 6403 7051 Call charged at local rate	114580
Spain	Number: +34 900 031 156 Call charged at local rate	114580
Sweden	Freephone: 020 160 4703	114580
Switzerland	Freephone: 080 000 5691	114580
United Arab Emirates	Freephone: 800 0444 0408	114580
United Kingdom	Freephone: 080 0022 4118	114580
United States of America	Number: +1 (669) 288 7154	114580