

Complaints & Whistleblowing policy – external stakeholders

Introduction

At AEGIR-Marine, we value integrity, transparency, and continuous improvement. If you have a concern or complaint about our services, behavior, or working methods, and it cannot be resolved informally, you can report it through our formal Complaints and Whistleblower Procedure. All reports will be handled confidentially and with care.

Part 1 – Complaints Procedure

1.1 Definitions

- **AEGIR-Marine Group** refers to all companies under the holding company Asgard B.V. A complete overview of these companies can be found on the contact page of our website (www.aegirmarine.com).
- **Complaint** refers to any written expression of dissatisfaction regarding:
 - The general working methods or policies of the AEGIR-Marine Group;
 - The content or manner in which services and/or products have been delivered, as formally agreed upon between AEGIR-Marine Group and the Complainant;
 - Behavior by an employee of AEGIR-Marine Group that may be in breach of our Code of Conduct, applicable laws, regulations, or professional standards.
- **Complainant** is any natural or legal person submitting a complaint under this procedure.
- **Complaints Officer** is the designated individual within AEGIR-Marine Group responsible for handling complaints when a satisfactory resolution cannot be reached with the regular contact person. The Complaints Officer operates independently from daily operations.

1.2 Submitting a Complaint

Before formally submitting a complaint, please attempt to resolve the matter with your regular contact person at AEGIR-Marine Group. If that does not lead to a resolution, you may submit a formal complaint via email or post.

Please include the following:

1. Full name, organization (if applicable), address, email, and phone number;
2. Date of submission;
3. Name of your company contact;
4. Description of the complaint and any prior steps taken.

Submit to:

- **Email:** feedback@aegirmarine.com
- **Postal address:**
AEGIR-Marine B.V.
Attn: Complaints Officer
Molenvliet 34
3961 MV Wijk bij Duurstede
The Netherlands

Only complete and clearly described complaints will be considered. By submitting, the Complainant agrees to this procedure.

1.3 Handling and Follow-Up

1. You submit a written complaint with all required information.
2. We confirm receipt within one week via email.
3. You receive a written response with findings within six weeks.

The Complaints Officer will keep you informed of progress. Communication will be via email unless postal mail is requested. Complex issues may take longer; you will be notified of any delays and revised timelines.

1.4 Data Handling and Confidentiality

In addition to the data in 1.2, we record:

1. Date and method of resolution;
2. Agreements and correspondence;
3. Complaint status.

The Complaints Officer treats all information confidentially. Files are stored centrally and retained for at least one year. You may request access to your file.

Personal data is processed in accordance with our [Privacy Statement](#). If needed, we may consult an independent expert under confidentiality. Submitting a complaint implies consent to this. Substantiated complaints help us improve our organization.

Part 2 – Whistleblowing Policy

2.1 Purpose and Scope

This policy provides a safe and confidential way for customers, suppliers, and other stakeholders to report serious concerns that could harm individuals, the organization, or the public interest.

Whistleblower reports may concern:

- Criminal offenses (e.g., fraud, bribery, corruption);
- Violations of laws, regulations, or internal policies;
- Environmental harm or safety threats;
- Unethical behavior or gross mismanagement;
- Concealment of any of the above.

If your concern falls outside the formal complaint scope or is more serious/systemic in nature, please report it under this whistleblower policy.

2.2 Reporting Channels

Reports can be submitted confidentially or anonymously via:

- **Email:** feedback@aegirmarine.com
- **Postal address:**
AEGIR-Marine B.V.
Attn: Complaints Officer
Molenvliet 34
3961 MV Wijk bij Duurstede
The Netherlands

Please include relevant details. Anonymous reports are accepted, though follow-up may be limited.

2.3 Protection of Whistleblowers

AEGIR-Marine Group ensures that whistleblowers who report in good faith are protected. This includes:

- Confidential treatment of your report;
- No retaliation or disadvantage as a result;
- Disciplinary measures for breach of confidentiality or retaliation.

2.4 Handling and Follow-Up

1. You submit a written serious concern with all required information.
2. We confirm receipt within one week via email.
3. You receive a written response with findings within 3 months.

The Complaints Officer will keep you informed of progress. Communication will be via email unless postal mail is requested. Complex issues may take longer; you will be notified of any delays and revised timelines.

2.5 Record Keeping and Data Protection

Reports are stored securely with restricted access. They are retained no longer than necessary for the investigation and follow data protection laws. Actions taken as a result of reports are documented accordingly.

AEGIR-Marine encourages all stakeholders to speak up when something seems wrong. Your integrity helps us protect ours.