



KLM Speak Up Policy

Procedures for handling reports of suspected misconduct

Royal Dutch Airlines



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1 Introduction

1.1 Introduction

KLM attaches a great deal of importance to establishing a just culture in which you feel free and willing to report cases of Misconduct. In case of Misconduct KLM encourages you to speak up, i.e. to express your concerns rather than to stay silent. It is also important that you never investigate Misconduct yourself. This Speak Up Policy will provide information on how to report, how Reporter's confidentiality and protection are guaranteed and how reports will be handled. In addition to this Speak Up Policy, a summary titled 'Key points of the Speak Up Policy' is available.

1.2 Scope and addressees of the Speak Up Policy

The Speak Up Policy applies to all Internal and External Reporters (as defined under Clause 1.4).

1.3 Effective Date & version

This Speak Up Policy replaces the KLM Whistleblower Policy (version AMS/CC/2020/v.1.) and the KLM Fraud Response Protocol (version SPLAV/22-01-2019) and enters into effect on 01-04-2022 and concerns version: AMS/CC/2022/v.1.

1.4 Definitions

The terms used in the Speak Up Policy are defined as follows:

1. **Coordinating Body:** either the First Line Coordinator, the KLM Compliance Committee or the Chair of the Supervisory Board coordinating the investigation of a report submitted in accordance with Clause 2.2 or 2.3 of the Speak Up Policy.
2. **Confidential Advisors:** a number of professionals designated by KLM that can be contacted by those who are considering filing a report but who wish to obtain advice beforehand.
3. **Executive in Charge:** the executive who bears final responsibility within the business unit or subsidiary, or, in the absence of this person, the member of the KLM Board of Managing Directors who is responsible for said business unit or subsidiary.
4. **External Reporter:** any of the following external persons who is filing (or considering filing) a report under the Speak Up Policy:
 - any persons where they acquired information on Misconduct in a work-based relationship which has since ended.
 - any persons whose work-relationship is yet to begin in cases where information on Misconduct has been acquired during the recruitment process or other pre-contractual negotiations.
 - any persons working under the supervision and direction of KLM's contractors, subcontractors and suppliers who acquired information on Misconduct in a work related context, shareholders and persons belonging to KLM's administrative or supervisory body, including Supervisory Board members who acquired information on Misconduct in a work related context.

5. **First Line Coordinator:** a person who coordinates the investigation of a report submitted through the appropriate channel in accordance with Clause 2.2.1 or 2.2.2 of the Speak Up Policy.
 6. **Internal Reporter:** any KLM staff member directly employed by KLM or self-employed as well as any paid or unpaid trainee, who acquired information on Misconduct in a work-related context and is filing (or considering filing) a report under the Speak Up Policy.
 7. **KLM:** Koninklijke Luchtvaart Maatschappij N.V. and its subsidiaries (but only those (i) in which Koninklijke Luchtvaart Maatschappij N.V. holds a shareholding >50% and (ii) of which its management and - to the extent applicable - Works Council have approved this Speak Up Policy).
 8. **KLM Compliance Committee:** the KLM Compliance Committee's primary role is to support the KLM Board of Managing Directors and Executive Team on compliance matters relevant to KLM, excluding all operational safety, occupational safety, environmental safety and operational security compliance matters. The KLM Compliance Committee consists of the following members:
 - Vice President Corporate Secretary & General Counsel - AMS/DS (Chair)
 - Chief People Officer & EVP - AMS/HA
 - Vice President of Internal Audit - AMS/DC
 - Vice President of KLM Security Services - SPL/AV
 - Director Compliance & Business Ethics - AMS/CC (Secretary)
 9. **Manager:** the person within KLM who is the Internal Reporter's manager in the hierarchy.
 10. **Misconduct:** misconduct means (suspected) misconduct or the opportunity of misconduct. Examples of Misconduct that concern the following areas can be reported under this Speak Up Policy:
 - Fraud in the broadest sense
 - Credit Card fraud
 - Bribery & Corruption
 - Money laundering
 - Conflict of interest
 - Protection of privacy and personal data, and security of network and information systems
 - Breaches of competition law
 - Export control and trade sanctions (including terrorist financing)
 - Customs compliance violations
 - Public procurement
- This Speak Up Policy does not cover:
- *Safety & Security* - Reports concerning operational safety, occupational safety, environmental safety and operational security fall under the scope of the Safety and Compliance Organisation and KLM Security Services and can be submitted via MyKLM.
 - *HR related problems and/or complaints* - Questions or problems regarding employment terms and conditions, performance reviews, or personal complaints.

11. **Reporter:** an Internal Reporter or an External Reporter.

12. **SpeakUp system:** The SpeakUp system is operated by an independent service provider and is available 24/7. Via the SpeakUp system a Reporter can report Misconduct securely. Qualified colleagues will handle the report internally.

2 Reporting

2.1 Preliminary advice from a Confidential Advisor & other questions

- 2.1.1 Confidential Advisors have been appointed on behalf of KLM to handle enquiries from Reporters who first wish to know more about the Speak Up Policy, who want advice about whether or not to file a report under the Speak Up Policy or who seek (emotional) support throughout the procedure. The contact details for the Confidential Advisors can be found on MyKLM (or for External Reporters contact vertrouwenspersonenklm@klm.com).
- 2.1.2 In order to provide advice, a Confidential Advisor may – only after consulting the Reporter and obtaining his/her approval – consult the members of the KLM Compliance Committee.
- 2.1.3 The Reporter is not bound by the advice rendered by a Confidential Advisor.
- 2.1.4 If the issue is of key importance to KLM, a Confidential Advisor may independently decide to report the Misconduct to a First Line Coordinator (or, if applicable, the KLM Compliance Committee or the Chair of the KLM Supervisory Board) regardless of whether the Reporter decides to file a report after receiving the advice. The Confidential Advisor will immediately inform the Internal Reporter of the report in such case.
- 2.1.5 Clauses 3.1 and 3.2 also apply to preliminary advice.

How and where to report / reporting procedures

2.2 Internal Reporting Procedures

Internal Reporters have four (4) options to report Misconduct as listed below:

- 2.2.1 Contact their [Manager](#) to make a report to the First Line Coordinator. Contacting the Manager is strongly recommended as KLM aims to make 'speaking up' more accessible.

The Manager will follow the procedure referred to under Appendix 1: the Procedure for Managers; or

- 2.2.2 To a [First Line Coordinator](#) through the SpeakUp system, if reporting to a Manager is impossible or undesirable. Via this [link](#), all relevant practical details are included.

The First Line Coordinator will follow the procedure referred to under Appendix 2: Procedure for the First Line Coordinator; or

- 2.2.3 To the [KLM Compliance Committee](#) through the SpeakUp system. Via this [link](#), all relevant practical details are included.

The KLM Compliance Committee will follow the procedure referred to under Appendix 3: Whistleblowing procedure for the KLM Compliance Committee/ Chair of the Supervisory Board. The KLM Board of Managing Directors will study the results and issue a decision regarding follow-up; or

2.2.4 To the [Chair of the Supervisory Board](#), only if the report involves members of the KLM Board of Managing Directors (Directie) or members of the KLM Compliance Committee themselves. In Clause 2.3, the contact details of the Chair of the Supervisory Board are included.

The Chair of the Supervisory Board will follow the procedure referred to under Appendix 3: Whistleblowing procedure for the KLM Compliance Committee/ Chair of the Supervisory Board.

2.3 Reporting Procedure for External Reporters

External Reporters should report to the [KLM Compliance Committee](#) through the SpeakUp system. Via this [link](#), all relevant practical details are included. Or, if the report involves members of the KLM Board of Managing Directors (Directie) or members of the KLM Compliance Committee themselves, to the [Chair of the KLM Supervisory Board](#).

Chair of the Supervisory Board

Regular Post

Voorzitter KLM Raad van Commissarissen

PO Box 75770

NL-1118 ZX Schiphol Airport

The KLM Compliance Committee/Chair of the Supervisory Board will follow the Procedure referred to under Appendix 3: Whistleblowing procedure for the KLM Compliance Committee/Chair of the Supervisory Board.

2.4 Anonymous reporting

2.4.1 KLM highly values contact with the Reporter, with a view to providing that person with optimal protection and guidance. This is why KLM has stated a preference for reports to be made non-anonymously. Reporters are therefore asked for their personal details when making a report. Subject to clause 3.1 the Coordinating Body treats the Reporter's identity as strictly confidential.

2.4.2 When filing an anonymous report, the Reporter should take into consideration that this will make it more difficult to follow up on the substance of the report, since it will be more difficult to maintain contact with the Reporter.

3 Guarantees (confidentiality and legal protection)

3.1 Confidentiality regarding the identity of the Reporter; Reporter's duty of confidentiality

- 3.1.1 To the extent permitted by law, every effort will be made to maintain the confidentiality of the Reporter's identity, in accordance with the need to conduct a proper investigation and in accordance with the need to protect the Reporter.
- 3.1.2 The Coordinating Body and the investigation team will be informed of the Reporter's identity. Unless (i) compelling interests dictate otherwise, (ii) disclosure is required by national laws and regulations (iii) the Reporter has granted his/her explicit written consent or (iv) in an event described under Clause 3.1.3, no one else will be informed of the Reporter's identity.

- 3.1.3 In cases in which the Reporter himself/herself has taken part in the misconduct, or in situations in which the Reporter has deliberately abused the Speak Up Policy, the Reporter's identity may be disclosed (i) within KLM to the extent necessary to take the applicable disciplinary measures stipulated in the collective agreements that apply to KLM and/or (ii) to authorised agencies outside KLM.
- 3.1.4 The Reporter undertakes a duty of confidentiality with regard to the report, unless compelling interests dictate otherwise, said determination to be made by the Coordinating Body.

Legal Protection

3.2 Legal protection of the Reporter

- 3.2.1 KLM will not discriminate in any way against a Reporter who has properly reported Misconduct in good faith. The provisions of this Clause 3.2 shall also apply to (i) facilitators, third persons who are connected with the Reporter and who could suffer retaliation in a work-related context, such as colleagues or relatives of the Reporter and (ii) legal entities that the Reporter owns, works for or are otherwise connected with in a work-related context. Where a report turns out to be unfounded, the protection against discrimination shall be extended to the reported person.

- 3.2.2 The term 'discrimination' as used in Clause 3.2.1 will in any case encompass the taking of a measure with the purpose to retaliate against a Reporter for submitting a report, such as:
- a. suspension, lay-off, dismissal or equivalent measures;
 - b. demotion or withholding of promotion;
 - c. transfer of duties, change of location of place of work, reduction in wages, change in working hours;
 - d. withholding of training;
 - e. a negative performance assessment or employment reference;
 - f. imposition or administering of any disciplinary measure, reprimand or other penalty, including a financial penalty;
 - g. coercion, intimidation, harassment or ostracism;
 - h. discrimination, disadvantageous or unfair treatment;
 - i. failure to convert a temporary employment contract into a permanent one, where the worker had legitimate expectations that he or she would be offered permanent employment;
 - j. failure to renew, or early termination of, a temporary employment contract;
 - k. harm, including to the person's reputation, particularly in social media, or financial loss, including loss of business and loss of income;
 - l. blacklisting on the basis of a sector or industry-wide informal or formal agreement, which may entail that the person will not, in the future, find employment in the sector or industry;
 - m. early termination or cancellation of a contract for goods or services;
 - n. cancellation of a licence or permit;
 - o. psychiatric or medical referrals.

3.2.3 The discrimination referred to in Clause 3.2.1 will also be deemed to exist if there are reasonable grounds for calling the Reporter to account for his/her performance or if KLM takes a measure listed in Clause 3.2.2 against him/her but the measure is disproportionate to the grounds.

3.2.4 If, within a foreseeable period after a report is made, KLM takes one of the measures referred to in Clause 3.2.2 against the Reporter, it must provide substantiation for why this was considered necessary and affirm that the measure was not taken in relation to a report of Misconduct that was made properly and in good faith.

3.2.5 KLM will ensure that the Internal Reporter's Manager and colleagues refrain from engaging in discriminatory conduct against the Reporter in connection with the report of Misconduct that was made properly and in good faith in any way that would impede the Reporter in the latter's performance of his/her personal or professional duties. This discriminatory conduct will in any case be understood to comprise:

- a. Bullying, ignoring, or excluding the Reporter;
- b. Making unfounded or disproportionate accusations regarding the Reporter's performance;
- c. Imposing de facto bans, howsoever named or formulated, prohibiting the Reporter or his/her colleagues from participating in an investigation, subjecting them to gag orders, or banning them from the workplace and/or contact;
- d. Intimidating the Reporter by threatening to take certain measures or engage in certain conduct if he/she persists in making the report.

- 3.2.6 KLM will call staff members who discriminate against the Reporter to account for their actions, and may issue a warning or impose disciplinary measures on such staff members.
- 3.2.7 Any form of discrimination against a Reporter in connection with a report of Misconduct can be reported to the KLM Compliance Committee via compliancecommittee@klm.com (or to the Chair of the Supervisory Board, only if the report involves members of the KLM Board of Managing Directors (Directie) or members of the KLM Compliance Committee themselves). The contact details of the Chair of the Supervisory Board are referred to under Clause 2.3.
- 3.2.8 Please see Appendix 2: the Procedure for the First Line Coordinator and Appendix 3: Whistleblowing procedure for the KLM Compliance Committee/Chair of the Supervisory Board, which contain additional provisions regarding contacting the Reporter during the investigation.

3.3 Dutch law and personal data protection

The Speak Up Policy and the SpeakUp system satisfy the requirements under Dutch law with regard to employment legislation and the General Data Protection Regulation (GDPR), in the Dutch Algemene Verordening Gegevensbescherming (AVG).

In the unexpected event that the Speak Up Policy is inapplicable outside the Netherlands because it does not satisfy local legislation (or does not do so in full), the other provisions of the Speak Up Policy will remain in effect. The inapplicable provision will then be replaced with a provision which is permissible under the relevant law and which differs as little as possible from the original

provision so that the objectives of the Speak Up Policy can be met. In such cases, the Coordinating Body will perform a risk assessment before the report is handled.

Questions and complaints about the use of personal data by the Coordinating Body can be submitted to the Corporate Privacy Office (AMS/PI, KLMPrivacyOffice@klm.com).

4 Proceedings and procedures after reporting

4.1 Handling of information

- 4.1.1 Information that is collected during an investigation may only be passed on within KLM if its confidentiality can be sufficiently guaranteed.
- 4.1.2 Information will only be passed on to the extent necessary for the investigation, including to the investigation team, persons who supervise and/or audit and regulate KLM and who are authorised to take action based on this information.
- 4.1.3 Only after adequate preservation measures have been taken (in order to prevent the destruction of evidence) may an individual be informed that he/she is the subject of the investigation being conducted pursuant to a report of Misconduct.

Conclusions of the investigation

4.2 Conclusions of the KLM Compliance Committee/Chair of the KLM Supervisory Board

- 4.2.1 This clause 4.2 is not applicable if a report is submitted to a First Line Coordinator (see Clause 2.2.1 and 2.2.2).

- 4.2.2 The Reporter will be informed in writing by or on behalf of the KLM Compliance Committee or the Chair of the KLM Supervisory Board of the conclusions regarding the Misconduct. This notification will be made within a period of eight weeks from the report date.
- 4.2.3 If the KLM Compliance Committee or the Chair of the KLM Supervisory Board is unable to notify the Reporter of its conclusions within the eight-week period described in Clause 4.2.2, either it or its representatives will notify the Reporter of that fact as soon as possible, but by no later than one day after the eight-week period elapses, informing the Reporter about when he/she can reasonably expect to be provided with information about the conclusions not exceeding three months from the written confirmation of receipt referred to under Appendix 3: Whistleblowing procedure for the KLM Compliance Committee/Chair of the Supervisory Board.
- 4.2.4 When the Reporter receives the decision from the KLM Compliance Committee or the Chair of the KLM Supervisory Board that indicates that no further action will be taken on the report, the Reporter may submit a substantiated objection to the KLM Board of Managing Directors.
- 4.2.5 The KLM Board of Managing Directors will formulate a substantive response to that objection within a period of four weeks.

Post Investigation

4.3 Sanctions

Staff members who are suspected of engaging in misconduct will only be considered guilty once the suspicions have been sufficiently proved. Irrespective of the authority vested in it by law, KLM may take the disciplinary measures stipulated in the collective agreements that apply to KLM. In addition, and regardless of the authority vested in it by law, KLM may take the disciplinary measures stipulated in the collective agreements that apply to KLM against individuals who report Misconduct in bad faith.

4.4 Reporting and archiving reports and investigations

4.4.1 The KLM Compliance Committee will submit a summarised and anonymized overview of all reports every six months to the KLM Audit Committee of the KLM Supervisory Board, sending a copy to the KLM Board of Managing Directors and the KLM Works Council.

The overview must contain the following information:

- the number of reports;
- insight into the divisional distribution of the reports; and
- an overview of the various main topics of the reports.

4.4.2 The Coordinating Body will retain the files pertaining to all reports for no longer than it is necessary and proportionate in order to comply with the requirements imposed by national laws and regulations.

4.4.3 If disciplinary or legal measures are taken against the individual who engaged in misconduct or against an Internal Reporter who reported Misconduct in bad faith, the information regarding the investigation will be retained until any legal proceedings have been completed.

5 Reporting outside KLM

Reporting to an external party

5.1 Reporting to an external third party

- 5.1.1 This Speak Up Policy does not limit the rights of a Reporter to report a concern or suspicion of misconduct or irregularities to an external third party, especially if the Reporter cannot reasonably be required to report internally. These events include, but are not limited to the event:
- i. there is an acute threat involving a serious and urgent public interest that requires an external report to be made immediately;
 - ii. the Reporter has good reason to fear reprisals if he/she reports the matter internally;
 - iii. there is a clear risk that evidence will be concealed or destroyed;
 - iv. a prior report of the same misconduct in accordance with the procedure did not eliminate the misconduct;
 - v. the Reporter has a duty to report the matter to an external body;
 - vi. he/she disagrees with the conclusions referred to in Clause 4.2;
 - vii. he/she has not received such conclusions within the required period of time referred to in Clauses 4.2.2 and 4.2.3.

- 5.1.2 As meant in these regulations, an external third party is any external organisation (or representative thereof) that the Reporter reasonably believes to be the most suitable recipient of the report. External third parties are understood to include, in any case:
- a. an authority charged with investigating criminal offences;
 - b. an authority charged with monitoring compliance pursuant to a statutory requirement;
 - c. another authority where (suspected) misconduct can be reported, including the investigative division of the Home for Whistleblowers.

Appendix 1

Procedure for Managers

Receiving reports

1. The Manager will receive and record reports of Misconduct.

Registration method

2. The Manager will record the report in writing, including the date on which it was received, and will have the Internal Reporter sign it for approval, unless the Internal Reporter objects to signing. The Internal Reporter will receive a copy of the record.

Procedure

3. The Manager will submit the report of Misconduct without undue delay to a First Line Coordinator through the SpeakUp system. Via this [link](#), all relevant practical details are included.
4. The Manager will ensure the confidentiality of the report and its content, the identity of the person who is the subject of the report, and the identity of the person who submitted the report.

Appendix 2

Procedure for the First Line Coordinator

Receiving reports

1. The First Line Coordinator will record reports of Misconduct in writing.
2. The First Line Coordinator will question the Internal Reporter to obtain as much information possible about the Misconduct and get a complete picture of the situation.
3. The First Line Coordinator will anonymize the report. Information that could lead to the identity of the Internal Reporter must not be included in the recitation of the facts.

Procedure

1. The First Line Coordinator will without undue delay commence investigating the report of Misconduct.
2. The First Line Coordinator will advise the Internal Reporter about the protection of his/her personal data.

3. The First Line Coordinator will advise the Internal Reporter about the follow-up process and communication during the process.
4. The First Line Coordinator will keep reports received digitally in a reporting system or database designed for that purpose or on a secure hard drive. Any printouts of this information will be stored in a secure storage space.

Contact with the Internal Reporter

In addition to Clauses 3.1.2 and 3.1.3 of the Speak Up Policy regarding the legal protection of the Reporter, KLM will ensure that the Internal Reporter's position is properly protected if personal details must be disclosed.

Concluding action on the report

1. The First Line Coordinator will take a carefully weighed, substantiated decision regarding the severity of the Misconduct, whether the report constitutes a cause of action, and the degree to which the report justifies taking further steps.
2. The First Line Coordinator will formulate an investigation plan (possibly with the assistance of the parties referred to in paragraph 4).
3. The First Line Coordinator is authorised to conduct the investigation of the report (and the underlying circumstances) or to cause such investigation to be conducted. This investigation may, depending on the situation, consist of hearing parties involved, bystanders or other parties who may be able to shed light on the case, as well as a financial audit, audit of documents, and an ICT audit. With regard to independence and objectivity, reports will be prepared regarding all of the activities and findings relating to the investigation, and these will be included in the file.

4. In the context of the investigation, the First Line Coordinator may request assistance from amongst others:
 - the Internal Audit department;
 - the Security Services department;
 - the Corporate Compliance department;
 - the Legal Affairs department;
 - the Human Resources department;
 - the Integrated Safety Services Organisation
 - other internal departments or other departments at AFKL subsidiaries; or
 - one or more external investigation agencies.
 5. If, after careful consideration, the First Line Coordinator decides that the report does not merit further investigation, it will formulate a decision stating the grounds for declining to take further action on the report.
2. On a case by case basis and without undue delay the KLM Board of Managing Directors will be informed by the First Line Coordinator via the KLM Compliance Committee of reports:
 - if the nature and severity of the report could present major risks for KLM; and/or
 - if the reports result in important general recommendations for the KLM Board of Managing Directors.

Reporting

1. The First Line Coordinator will submit a summarised and anonymized overview of all reports every six months to the KLM Compliance Committee. The overview must contain the following information:
 - the number of reports;
 - insight into the divisional distribution of the reports; and
 - an overview of the various main topics of the reports.

The KLM Compliance Committee will submit a summarised and anonymized overview of all reports every six months to the KLM Audit Committee of the KLM Supervisory Board, sending a copy to the KLM Board of Managing Directors and the KLM Works Council as referred to under Clause 4.4.1 of the Speak Up Policy.

Appendix 3

Whistleblowing procedure for the KLM Compliance Committee/Chair of the Supervisory Board

Receiving reports

1. The KLM Compliance Committee/Chair of the Supervisory Board will record reports of Misconduct in writing.
2. The KLM Compliance Committee/Chair of the Supervisory Board will question the Reporter to obtain as much information possible about the Misconduct and get a complete picture of the situation.
3. The KLM Compliance Committee/Chair of the Supervisory Board will anonymize the report. Information that could lead to the identity of the Reporter must not be included in the recitation of the facts.

4. The KLM Compliance Committee/Chair of the Supervisory Board shall offer the Reporter the opportunity to check, rectify and agree the report.

Procedure

1. The Reporter will receive written confirmation of receipt of the report within seven days of that receipt.
2. The KLM Compliance Committee/Chair of the Supervisory Board will without undue delay commence investigating the report of Misconduct.
3. The Executive in Charge is informed without delay of the reported suspicion of misconduct and the date on which the report was received.
4. The KLM Compliance Committee/Chair of the Supervisory Board will advise the Reporter about the protection of his/her personal data.
5. The KLM Compliance Committee/Chair of the Supervisory Board will advise the Reporter about the follow-up process and communication during the process.
6. The KLM Compliance Committee/Chair of the Supervisory Board will keep reports received digitally in a reporting system or database designed for that purpose or on a secure hard drive. Any printouts of this information will be stored in a secure storage space.
7. If necessary, the Reporter may request personal, professional guidance. The Reporter may, only after consulting the KLM Compliance Committee/Chair of the Supervisory Board, charge KLM the reasonable costs of obtaining such guidance.

Contact with the Reporter

In addition to Clause 3.1 of the Speak Up Policy regarding confidentiality, the following must also be observed in contacts with the Reporter.

1. If personal details must be disclosed, KLM will ensure that the Reporter's position is properly protected.
2. The KLM Compliance Committee/Chair of the Supervisory Board (i) will inform the Reporter about the start of the investigation and, in the event of a longer-term investigation, will periodically contact the Reporter with general progress reports and (ii) may only provide the Reporter with more substantive information about the investigation if doing so would be in the interests of the investigation.

Concluding action on the report

1. The KLM Compliance Committee/Chair of the Supervisory Board will take a carefully weighed, substantiated decision regarding the severity of the Misconduct, whether the report constitutes a cause of action, and the degree to which the report justifies taking further steps.
2. The decision will be recorded in writing and added to the file.
3. The KLM Compliance Committee/Chair of the Supervisory Board will formulate an investigation plan (possibly with the assistance of the parties referred to in paragraph 6).
4. The KLM Compliance Committee will formulate an investigation plan in cooperation with the Board of Managing Directors. This paragraph will not apply if the report is made to the Chair of the KLM Supervisory Board. In the latter case, the Chair of the KLM Supervisory Board himself/herself will formulate an investigation plan (possibly with the assistance of the parties referred to in paragraph 6).
5. The KLM Compliance Committee/Chair of the Supervisory Board is authorised to conduct the investigation of the report (and the underlying circumstances) or to cause such investigation to be conducted. This investigation may, depending on the situation, consist of hearing parties involved, bystanders or other parties who may be able to shed light on the case, as well as a financial audit, audit of documents, and an ICT audit. With regard to independence and objectivity, reports will be prepared regarding all of the activities and findings relating to the investigation, and these will be included in the file.
6. In the context of the investigation, the KLM Compliance Committee/Chair of the Supervisory Board may request assistance from amongst others:
 - the Internal Audit department;
 - the Security Services department;
 - the Corporate Compliance department;
 - the Legal Affairs department;
 - the Human Resources department;
 - the Integrated Safety Services Organisation;
 - other internal departments or other departments at AFKL subsidiaries; or
 - one or more external investigation agencies.

7. If, after careful consideration, the KLM Compliance Committee/Chair of the KLM Supervisory Board decides that the report does not merit further investigation, it will formulate a decision stating the grounds for declining to take further action on the report. If the report was submitted to the KLM Compliance Committee, the KLM Compliance Committee will submit its decision to the KLM Board of Managing Directors. If no objection is received from the KLM Board of Managing Directors within ten days, the KLM Compliance Committee will send the decision to the Reporter.
8. If the report was submitted to the KLM Compliance Committee, the KLM Compliance Committee will prepare a final report of the investigation on behalf of the KLM Board of Managing Directors. If an external agency is requested to conduct the investigation, the report of the external agency may be separately appended to the final report. The final report may advise the KLM Board of Managing Directors with regard to follow-up steps and possible sanctions.
9. If the report was submitted via the Manager, the KLM Compliance Committee will, unless compelling interests on the part of the Reporter dictate otherwise, notify that Manager of the findings of the investigation of the Misconduct that was reported.
10. The KLM Compliance Committee/Chair of the KLM Supervisory Board will inform the Reporter in writing of the findings of the investigation of the Misconduct that was reported and will indicate - if the report was submitted to the KLM Compliance Committee - the date on which the investigation was transferred to the KLM Board of Managing Directors.
11. If the report was submitted to the KLM Compliance Committee, the KLM Board of Managing Directors will study the results of the investigation and issue a decision regarding follow-up. If the report is held to be well-founded, the KLM Board of Managing Directors will consider any sanctions to be imposed or other measures to be taken.
12. If the report was submitted to the KLM Compliance Committee the decisions and rulings of the KLM Board of Managing Directors will be recorded by the KLM Compliance Committee, affirmed by the KLM Board of Managing Directors, and added to the report file.

Reporting

The KLM Compliance Committee will submit a summarised and anonymized overview of all reports every six months to the KLM Audit Committee of the KLM Supervisory Board, sending a copy to the KLM Board of Managing Directors and the KLM Works Council as referred to under Clause 4.4.1 of the Speak Up Policy.



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