

GENEBA PROPERTIES N.V. - INCIDENT REPORTING AND COMPLAINT MANAGEMENT POLICY

The below is an extract from the Geneba Policies and Procedures.

2.6 INCIDENT AND COMPLAINTS MANAGEMENT POLICY

The reporting and investigation of incidents and complaints plays a key part in the contribution of honest business conduct and preserving trust of all stakeholders in Geneba. Additionally, incident and complaints management will be an essential tool to improve standards in the working environment, compliance and services provided and to take appropriate actions to mitigate the risk from happening again.

2.6.1 Scope of Policy

This policy covers all complaints incidents and near misses involving employees, directors, service providers, visitors, contractors or any other person or entity involved with the business operations of Geneba. This policy applies to all employees and contractors of all subsidiaries of Geneba.

2.6.2 Responsibilities

- The Management Board has the final responsibility for the management of this policy.
- The Management Board will ensure that (i) there are processes in place by which incidents can be reported for each of Geneba's departments or services; (ii) staff is aware of this policy and its requirements; and (iii) suitable and sufficient training has been provided to ensure its implementation.
- The Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations of the compliance policies and, at his discretion, shall advise the Management Board.
- All employees are individually responsible for reporting incidents they may identify.

2.6.3 Definitions

An incident can be defined as a behaviour or occurrence which forms a serious threat to the sound operation of Geneba, whether carried out by Geneba, its employees or other individuals acting for or on behalf of Geneba. This not only includes an incident that actually occurred but also any near misses.

A complaint is a statement that something is unsatisfactory or unacceptable.

2.6.4 Reporting Incidents by employees and complaints by investors

Any employee who becomes aware of an incident, whether it has occurred or is about to occur, should report this to the Compliance Officer. Investors are also encouraged to present their complaints in the

same manner. The Compliance Officer has specific and exclusive responsibility to investigate all reported violations and complaints. Incidents are reported by the Company to the AFM.

2.6.5 No Retaliation

No employees who in good faith report a violation of the compliance policies shall suffer harassment, retaliation or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This policy is intended to encourage and enable employees and others to raise serious concerns within Geneba prior to seeking resolution outside of the organisation.

2.6.6 Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation of the compliance policies must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the compliance policies. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

2.6.7 Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

2.6.8 Handling of Reported Incidents or Complaints

The Compliance Officer will notify the sender and acknowledge receipt of the reported incident, suspected incident or complaint within 5 business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation. Both the Management Board and Supervisory Board will be informed forthwith by the Compliance Officer of incidents or complaints. The Compliance Officer may take action with respect to the incident or complaint by escalating this to the Management Board. If necessary, the appropriate financial regulatory authorities will be notified about the breach and investors will be informed.

2.6.9 Sanctions

Geneba reserves the right, in the event of the infringement of one or more of the provisions of the compliance policies, to impose all sanctions, which it can impose under the law and/or the contract (including an employment contract) with the person concerned. This could include the possible immediate termination of the contract (including an employment contract).

2.7 RECORD KEEPING

All records gathered at on-boarding stages, throughout a particular relationship, as part of on-going monitoring or throughout the different stages which lead to the completion of a transaction in general will be kept for at least 5 years after such transaction was carried out or the relationship was terminated. Geneba may, at the request of any competent authority, examine its databases in order to assess whether certain persons or institutions may be associated with suspected terrorist or related activities. The results of such examination shall be provided to the competent authority within a deadline to be determined by the competent authority.