

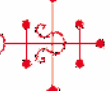


Whistleblower Policy

BoD approval date: 9 February 2021
Effective date: 15 February 2021

Institution for Occupational Retirement Provision
EXXONMOBIL OFP
Hermeslaan 2
1831 Machelen

Belgian Official Gazette identification number 2240/87
Judicial district of Machelen
Registered business number: 0432.957.916
IORP authorised on 11 January 1996, registered with the FSMA under number 50.246

 ExxonMobil OFP	ExxonMobil OFP	Feb 2021
	Whistleblower Policy	Page 2 of 4

The ExxonMobil OFP wants to treat a suspicion of irregularity or wrongdoing carefully. This policy states that people (employees and others who are in a contractual relationship with the OFP) who report potential irregularities or misconduct and act in good faith, deserve to be protected without suffering any damage to their (legal) position and reputation.

Article 1 Definitions

Irregularity/misconduct:

an incident of a general, operational or financial nature that constitutes or may constitute a serious infringement on the management and integrity of the Fund.

Confidential mediator

the person appointed as confidential mediator by the OFP's Board of Directors but who is not an official as referred to below. Please refer to the appendix for the contact details.

Whistleblower:

the official who reports an irregularity to the confidential mediator.

Official:

members of the General Assembly;

members of the Board of Directors;

members of the Pension Council;

members of the Daily Management Committee;


members of committees established by the Board of Directors or Pension Council.

Article 2 Procedure

All officials are in a position to report irregularities to the confidential mediator. This may involve irregularities both within the pension fund and with parties to whom tasks are outsourced. The reporting can be done in writing, electronically or orally.

Article 3 Processing of reports

1. The confidential mediator and chairperson of the Board of Directors coordinate which steps will be taken to process the report of an irregularity. If the report relates to the chairperson, coordination will take place with the General Council on the Board of Directors.
2. The whistleblower is informed in writing by or on behalf of the chairperson of the Board of Directors with an analysis and opinion on the reported irregularity within a period of four weeks from the moment that the incident was reported to the confidential mediator. This includes the actions that have or will be taken as a result of the report.
3. If no substantive opinion can be formulated on the reported irregularity within four weeks, the whistleblower will be notified accordingly in writing by or on behalf of the chairperson of the

 ExxonMobil OFP	ExxonMobil OFP	
	Whistleblower Policy	Feb 2021 Page 3 of 4

Board of Directors. An indication will be given of the period within which a position will be taken.

4. The Risk Manager and the Compliance Manager are informed of the report and of the analysis and opinion of the Board of Directors.

Article 4 Legal Protection

1. The pension fund ensures that the whistleblower can report irregularities within the pension fund without jeopardising his or her position.
2. A report of an irregularity will remain anonymous within the rest of the organisation of the pension fund unless the whistleblower decides otherwise.

Article 5 Internal Reporting

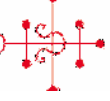
A report is submitted to the General Assembly and the Pension Council on the reported irregularities at least once per year. Such report contains a brief description of every irregularity reported:

- the irregularity raised;
- the reaction of the ExxonMobil OFP;
- any measures that may have been taken pursuant to the reporting.

Article 6 Entry into force and revisions of this policy

This policy has been adopted by the Board of Directors and may be amended by the Board of Directors.

Date	Changes
Feb 2021	Policy translated into English
Nov 2020	Policy amended for ExxonMobil OFP
Nov 2014	Policy established for Protector pensionfund

 ExxonMobil OFF	ExxonMobil OFF	
	Whistleblower Policy	Feb 2021
		Page 4 of 4

Appendix containing the Confidential Mediator contact details:

Sophie Bourgois EAME Regional Controls & Risk Manager
Email: sophie.bourgois@exxonmobil.com
Phone: +3222393966