



Whistleblower scheme

Principles

Royal Vaassen believes it is very important that whistleblowers (both inside and outside the organization) dare to report abuses and feel safe and protected. We also believe it is important that people who report abuses know which path to take and what to expect after reporting. That is why we have drawn up this whistleblower scheme.

1. What can I report?

Different kinds of abuse and/or violations can be reported. An abuse is a situation in which the social interest is at stake. The consequences must be major or serious, or could become so. Or it has disadvantages for more people than you personally and occurs frequently or for a long time. It must concern an abuse that you have seen or experienced yourself. You must be reasonably certain (a rumor is not enough). You can report the following abuses:

- Violations of the law or the Royal Vaassen code of conduct;
- Violations of integrity (for example if someone accepts bribes);
- Abuses that (may) pose a risk to public health, the environment or the safety of persons or animals;
- Violations of European Union law (for example, violations in the area of product safety).

2. Who can file a report?

- Employees, ex-employees, self-employed persons, flex workers, volunteers, interns or others who have performed (paid or unpaid) work at Royal Vaassen now or in the past;
- Employees of other organisations who have worked for Royal Vaassen, for example as a contractor, subcontractor, collaboration partner or temporary worker;
- Customers, clients, citizens, shareholders, applicants, students and parents who report abuses within Royal Vaassen.

3. Who can I report abuses to?

You can report abuses to:

- your manager or (if this person is involved in the abuse) a higher manager;
- an internal or external confidential counselor (they do not handle the report in terms of content, but advise you and act as a conduit to the manager or [if the manager is involved in the misconduct] to the external reporting point);

o Internal: Robert Schippers / rschippers@royalvaassen.com / 088-3355153

o External: Reineke Bierma of Durescom / vertrouwenspersoon@durescom.nl / 033-2003230;

- an external whistleblower reporting and investigation point: the House for Whistleblowers (see contact details below).





Royal Vaassen would like to have the opportunity to investigate reports internally first, so that we can resolve the misconduct ourselves. More serious misconduct can and sometimes must also be reported directly externally to a competent authority. For example, if there is a legal obligation to report the misconduct. Also report immediately externally if the management of Royal Vaassen is involved in the irregularity, if your colleagues or others are in acute danger or if you believe that your internal report has not been handled properly.

For Royal Vaassen, the following authorities are the most obvious:

- o in the event of (suspicions of) cartel formation or similar: the Netherlands Authority for the Financial Markets (AFM);
- o in the event of (suspicions of) money laundering practices: the Netherlands Authority for Consumers and Markets (ACM);
- o in the event of (suspicions of) privacy violations: the Dutch Data Protection Authority (AP);
- o in the event of (suspicions of) fraud: the Fiscal Intelligence and Investigation Service (FIOD);
- o in the event of (suspicions of) environmental offences: the Human Environment and Transport Inspectorate (ILT);
- o in the event of (suspicions of) violation of employment legislation: the Labour Inspectorate.

If you do not know where to go or would like advice, please contact the House for Whistleblowers;

- o T: 088 – 133 10 00 (general number)
- o E-mail: contact@huisvoorklokkenluiders.nl.

4. How do I report a wrongdoing?

You can report a wrongdoing personally, but you can also report anonymously. You can report verbally, in writing or digitally (via e-mail, app, text message, etc.).

5. What happens after my internal report?

Your report will be treated confidentially. This means that we will not disclose your identity in any way. Not even indirectly. Unless you give explicit and written permission for this.

We will register your report (anonymously if desired) in our whistleblower register. This register has been set up by an external party (Altios) in such a way that only the internal confidential counselor has access to and insight into this register. You will receive a confirmation of receipt of your report within 7 days. You will hear within two weeks of your report whether we will start an investigation.





If we decide not to conduct an investigation, we will tell you why not. If we decide to investigate, we will engage the external investigation point to conduct an independent investigation. If the data from your report no longer needs to be retained, we will remove this data from the whistleblower register.

You will be informed of the assessment and any follow-up within three months of sending the acknowledgement of receipt.

