



# Whistleblower Scheme

## ORANJEGROEP

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## Content

Introduction.....	2
Article 1 – General.....	2
Article 2 – Definitions .....	2
Article 3 – Internal reporting, information, advice and support.....	2
Article 4 – Procedure after internal reporting .....	3
Article 5 – Conducting the investigation .....	3
Article 6 – External report.....	3
Article 7 – Protection against disadvantage .....	3
Article 8 – Confidentiality .....	4

## Introduction

ORANJEGROEP considers it important that employees can report suspected wrongdoing in a safe manner without fear of negative consequences.

Based on the Whistleblowers Protection Act, ORANJEGROEP has adopted the following reporting procedure and provided it to those working for it. This procedure enables employees to report at an early stage and contributes to an adequate response by ORANJEGROEP. Within this framework, ORANJEGROEP aims for an open culture, where integrity and calling each other to account for behaviour are encouraged and appreciated.

### Article 1 – General

Deze meldregeling is bedoeld voor het melden van het vermoeden van een misstand, waarbij het vermoeden gebaseerd is op redelijke gronden en het maatschappelijk belang in het geding is. Deze meldregeling is niet bedoeld voor (individuele) arbeidsconflicten, het melden van persoonlijke klachten over aangelegenheden in verband met de verrichte arbeid en/ of beloning, het uiten van kritiek op de door ORANJEGROEP gemaakte (beleids)keuzes en/ of voor het behalen van persoonlijk gewin.

### Article 2 – Definitions

In these reporting regulations, the following definitions apply:

1. employee: the person who performs or has performed work under an employment contract or the person who performs or has performed work other than from employment;
2. employer: ORANJEGROEP Holding B.V. and its group companies, who performs work or has work performed under an employment contract or who performs work or has work performed otherwise than through employment;
3. suspected wrongdoing: the suspicion of an employee that wrongdoing exists insofar as:
  - a. the suspicion is based on reasonable grounds arising from the knowledge that the employee has gained at his employer or has gained through his work at another company; and
  - b. there is a violation or risk of violation of Union law; and
  - c. the public interest is at stake in:
    - the violation of a statutory provision;
    - the violation or a danger of violation of Union law;
    - a danger to public health
    - a danger to the safety of persons;
    - a danger of damage to the environment;
    - the violation of internal rules of the employer;
    - a danger to the proper functioning of the public service or enterprise as a result of improper acts or omissions.
4. confidential adviser: the person appointed to act as such for the employer's company, who can be consulted in confidence by an employee about a suspicion of wrongdoing;
5. management: the body or person who has the day-to-day management of the employer's company;
6. external body: the body which, in the reasonable opinion of the reporter, is the most appropriate to make the external report of wrongdoing to.

### Article 3 – Internal reporting, information, advice and support

1. An employee may consult the confidential adviser in confidence about a suspicion of wrongdoing and request information, advice and support.
2. The employee with a suspicion of wrongdoing may report it to the management within ORANJEGROEP. If the employee concerned has a reasonable suspicion that the management is

involved in the suspected wrongdoing, the report may also be made to the House for Whistleblowers.

3. The report may also be made via the confidential adviser. The confidential adviser shall forward the report.

4. The employee can report in the following way:

- a. In writing to klokkenluiders@ORANJEGROEP.nl; or
- b. Verbally via telephone or other voice messaging systems; or
- c. At his request within a reasonable time by means of an interview at a location.

5. The employee with a suspicion of wrongdoing at a company other than ORANJEGROEP may report it to the relevant other company. The management shall be informed that a report has been made to the relevant other company if employee has come into contact with the suspected wrongdoing through his work for the employer.

#### Article 4 – Procedure after internal reporting

1. The recipient of the report shall ensure that this is recorded in writing in a register, including a description of the report and the date on which it was received.

2. The employee shall receive a confirmation of receipt within seven days of receiving his report.

3. The management investigates whether the report concerns suspected wrongdoing.

4. The employee receives information on the assessment and (if applicable) follow-up of the report within a reasonable period of no more than three months after sending the confirmation of receipt.

5. If the management decides to inform an external body of the internal report, the reporter will receive a copy of this, unless there are serious objections to this and/or the interests of the investigation or enforcement may be harmed as a result.

6. If the management decides to conduct an investigation, this will be conducted by independent and impartial investigators and not by persons who may be or have been involved in the suspected wrongdoing. The reporter shall be informed of this in writing without delay.

#### Article 5 – Conducting the investigation

1. The investigators give the reporter and others involved the opportunity to be heard and draw up a draft investigation report. The reporter is given the opportunity to comment on this, unless there are serious objections. The aim is then to adopt the investigation report within ten weeks of the report.

2. The management informs the reporter in writing of the substantive standpoint concerning the report. This will also indicate the (follow-up) steps that the report has led to.

#### Article 6 – External report

1. The employee may directly report suspected wrongdoing externally.

2. The employee must make the external report to the House for Whistleblowers or to a competent authority designated by law. For more information, see the government website: <https://www.wetbeschermingklokkenluiders.nl/>

3. The employee may still make an external report even after making an internal report of suspected wrongdoing.

4. Reporting internally first is preferred and will be encouraged as much as possible.

#### Article 7 – Protection against disadvantage

1. If the reporter, in good faith and with due observance of the provisions in these reporting regulations, reports a suspicion of wrongdoing, ORANJEGROEP will not disadvantage the reporter in any way.

2. ORANJEGROEP will ensure that colleagues of the reporter refrain from any form of disadvantage in connection with reporting a suspicion of wrongdoing in good faith and properly, which hinders the reporter's professional or personal functioning.
3. If the reporter believes that there has been prejudice, he may discuss this with the confidential adviser without delay. The confidential adviser shall inform the management about this.
4. ORANJEGROEP will not disadvantage other parties involved in any way, including, but not limited to, the confidential adviser and/or the investigators.

#### Article 8 – Confidentiality

1. ORANJEGROEP shall ensure that the information about the report is kept in such a way that it is physically and digitally accessible only to those involved in the handling of this report. ORANJEGROEP shall treat the information that comes to its knowledge confidentially and shall process it - to the extent permitted - in accordance with the provisions of the General Data Protection Regulation and other relevant legislation.
2. ORANJEGROEP shall ensure that those involved in the handling of a report do not disclose the identity of the reporter without the express written consent of the reporter and shall treat the information about the report confidentially.