

WHISTLEBLOWER POLICY POLLUX PERSONEELSDIENSTEN B.V.

INTRODUCTION

Pollux Personeelsdiensten B.V. considers it important that employees can safely report suspected wrongdoing without fear of negative consequences.

On the basis of the Whistleblowers Protection Act, Pollux Personeelsdiensten B.V. 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 Pollux Personeelsdiensten B.V. responding adequately.

In this context, Pollux Personeelsdiensten B.V. strives for an open culture, in which integrity and calling each other to account for behaviour is encouraged and appreciated.

ARTICLE 1 – GENERAL

These reporting regulations are intended for the reporting of suspected misconduct, whereby the suspicion is based on reasonable grounds and social interests are at stake. These reporting regulations are not intended for (individual) labour conflicts, reporting personal complaints about matters relating to the work performed and/or remuneration, expressing criticism of (policy) choices made by Pollux Personeelsdiensten B.V. and/or for personal gain.

ARTICLE 2 – DEFINITIONS

In these reporting regulations, the following definitions apply:

1. **employee:** the person who performs or has performed work under an employment agreement or the person who performs or has performed work other than from employment;
2. **employer:** Pollux Personeelsdiensten B.V. who performs or has performed work under an employment contract or who performs or has performed work otherwise than through employment;
3. **suspicion of misconduct:** the suspicion of an employee that there is misconduct 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. social interest is at stake in:
- the violation of a statutory regulation;
 - 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 conduct or omission.
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. **senior manager:** the body or person who has day-to-day management of the employer's company;
6. **external body:** the body which, in the reporter's reasonable opinion, is best suited 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 suspected wrongdoing and request information, advice and support.
2. An employee who suspects wrongdoing may report it to the General Manager within Pollux Personeelsdiensten B.V. If the employee concerned has a reasonable suspicion that the General Manager is involved in the suspected wrongdoing, the report may also be made to the management.
3. The report can also be made via the confidential adviser. The confidant forwards the report.
4. The employee may report in the following manner:
 - a. In writing;
 - b. Verbal via telephone or other voice message 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 Pollux Personeelsdiensten B.V. may report it to the relevant other company. The General Manager is informed that a report has been made to the relevant other company if the employee came into contact with the suspected wrongdoing through his work for the employer.

ARTICLE 4 – PROCEDURE AFTER THE INTERNAL REPORT

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 after receipt of his report.
3. General Manager 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 from the sending of the confirmation of receipt.
5. If the General Manager decides to inform an external body of the internal report, the reporter will receive a copy, 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 General Manager decides to initiate an investigation, it 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 will be informed of this in writing without delay.

ARTICLE 5 – THE CONDUCT OF 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 eight weeks of the report.
2. The General Manager informs the reporter in writing of the substantive standpoint concerning the report. This will also indicate which (follow-up) steps the report has led to.

ARTICLE 6 – EXTERNAL REPORTING

1. The employee may directly report suspected wrongdoing externally.
2. The employee should make the external report to the House of Whistleblowers or to a competent authority designated by law. For more information, see: [Externe meldkanalen | Wat is er veranderd? | Wet bescherming klokkenluiders](#)
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 DETRIMENT

1. If the reporter, in good faith and with due observance of the provisions in these reporting regulations, reports a suspicion of wrongdoing, Pollux Personeelsdiensten B.V. will not disadvantage the reporter in any way.
2. Pollux Personeelsdiensten B.V. will ensure that colleagues of the reporter refrain from any form of prejudice 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 General Manager about this.
4. Pollux Personeelsdiensten B.V. shall not disadvantage other parties involved in any way, including, but not limited to, the confidential adviser and/or the investigators.

ARTICLE 8 – CONFIDENTIALITY

1. Pollux Personeelsdiensten B.V. shall ensure that the information about the report is kept in such a way that it is only physically and digitally accessible to those involved in dealing with the report. Pollux Personeelsdiensten B.V. treats the data brought to its attention as confidential and processes them – to the extent permitted – in accordance with the provisions of the General Data Protection Regulation and other relevant legislation.
2. Pollux Personeelsdiensten B.V. ensures 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 treat the information about the report as confidential.