

Whistle-blower Provision

As laid down by the InAdmin RiskCo Board of Directors on 30th October 2018

Valid until 31st December 2019

INHOUDSOPGAVE

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1 INTRODUCTION

Since the Whistleblower Act came into force on 1st July 2016, every employer with at least 50 employees is required to have an internal whistle-blower provision for wrongdoing. Certain legal requirements apply to such a whistle-blower provision. This document gives substantive expression to this whistle-blower provision for the employees of InAdmin RiskCo B.V., its subsidiaries and branches (together: **InAdmin RiskCo**).

Wrongdoing threatens the integrity and reputation of InAdmin RiskCo and its employees. InAdmin RiskCo believes it is important for any suspicion of wrongdoing to be reported. That is the only way for wrongdoing to be investigated and resolved. This can prevent possible wrongdoing to occur in the future. InAdmin RiskCo believes it is important for employees to be able to report their suspicions of wrongdoing in a safe manner and without fear of reprisals.

This whistle-blower provision includes the following:

- What is wrongdoing;
- Who can report it and how;
- What does InAdmin RiskCo do with a notification.
- What are the rights of the notifier;

2 WHAT IS WRONGDOING

Incidents occur in every organization. If such an incident has significant or social consequences, then wrongdoing has occurred.

There is suspicion of wrongdoing when you notice serious problems or irregularities during your work for InAdmin RiskCo. It involves wrongdoing that you believe must be disclosed and which requires action. The whistle-blower provision is therefore not meant for individual issues, such as a conflict between an employee and an immediate superior.

A few examples of wrongdoing are:

- Breach of legal or internal rules;
- fraude;
- proper functioning of InAdmin RiskCo in jeopardy as a result of improper actions or negligence;
- safety of employees or other persons in jeopardy.

A suspicion of wrongdoing must be substantiated. Filing a report based on rumours or stories told by others is not admissible.

The suspicion of wrongdoing must be so sensitive to you that it cannot be discussed any other way within InAdmin RiskCo. Other ways might include reporting the incident or discussing it with a colleague or a manager.

If you have doubts about whether there is wrongdoing or you are not sure what to do, you can consult the Advisory Department of the Dutch Whistleblowers Authority for information, advice and support (advies@huisvoorklokkenluiders.nl).

3 WHO CAN REPORT IT AND HOW

3.1 Who can report it

Anyone who is confronted with wrongdoing within the organisation while on the job can report this via the whistle-blower provision. This also includes the following persons:

- persons who are working for or have worked for InAdmin RiskCo in the past. This includes current employees and former employees, but also contractors, volunteers, flex workers and interns;
- employees from other organisations who, for example, work for InAdmin RiskCo as contractors, subcontractors, cooperation partners or agency workers.

3.2 How should the notification be submitted (internally)

The notification can be submitted to InAdmin RiskCo's Confidential Advisor. The name and contact details are listed on the Intranet. Of course, a notification can also be submitted with an immediate superior or that person's superior. In the interest of confidentiality and lowering the threshold for disclosure, RiskCo Administrations B.V. encourages reporting to the Confidential Advisor.

There are no specific formalities for submitting a report. This can be done orally or in writing.

3.3 Is external notification possible

External notification is appropriate when:

- Internal notification may not 'reasonably' be demanded of the employee, for example because you or a colleague are in danger. Another example is when you suspect that the Confidentiality Advisor or the most senior responsible person within the organisation is involved in wrongdoing.
- The report is not properly picked up or processed internally. For this to be the case, the notifier must first have followed the proper procedure for internal notification.
- There is an external notification requirement. In this case, the employee does not have to submit an internal notification first. In some cases, the employer is responsible for filing the external report. In that case, the employee must disclose the suspicion internally, so that the employer can comply with this notification requirement.

3.4 How should the external notification be submitted

External notification can be submitted to an inspection service or the watchdog (DNB), depending on the wrongdoing. If there is no appropriate external contact point, the external notification can also be submitted to the Investigation department of the Dutch Whistleblowers Authority.

The Dutch Whistleblowers Authority will not reveal your identity to InAdmin RiskCo. This only happens with your consent. If you would like to know more about the conditions for notification with the Dutch Whistleblowers Authority, and how the notification is processed there, then go to www.huisvoorklokkenluiders.nl.

3.5 Can I withdraw my notification?

You can withdraw your notification whenever you want. If you feel pressurised to withdraw your notification, then you can report this. The same process applies as for reporting a suspicion of wrongdoing.

4 WHAT IS THE PROCESS AFTER NOTIFICATION

4.1 What can the notifier expect when he/she files a notification

If the notifier submits a notification, he/she will receive feedback within one week with:

- Receipt of the notification;
- A 1-page explanation of the whistle-blower provision and the protection of the employee;
- The manner in which the notification will be processed;
- Explanation of the process of dealing with the notification.

4.2 Who is responsible for processing the notification

InAdmin RiskCo's Confidential Advisor is responsible for processing the notification.

InAdmin RiskCo's method is as follows:

- The notification must be recorded in writing. In case of a verbal notification, the person receiving the notification will put this to paper;
- The notifier receives a copy of the written notification and can add further information or amend it if necessary. If he/she is in agreement, he/she signs the notification;
- The notification is dated (this is also important to prove any penalisation at a later date);
- The notification will then be transferred as quickly as possible, if applicable, to the individual who will evaluate the notification. The notifier will receive notification of this.

4.3 Hoe verloopt het verdere proces

The subsequent steps and corresponding deadlines for feedback to the employee depend on the notification. It is the express wish of InAdmin RiskCo to conduct the process as quickly as possible, in the interest of all parties involved. The notifier will be involved in the continued process as follows:

- The decision regarding the notification: if the notification qualifies for investigation, but also if this is not the case, the notifier will be notified.
- The subsequent steps should an investigation take place: if the notification is to be investigated, the subsequent steps will be shared with the notifier. Contact will also be maintained with the notifier during the course of the investigation.
- The conclusion of the investigation: the notifier will be notified when the investigation is concluded. The most important conclusions will be shared with him/her.

4.4 How long is a notification saved?

When a notification has been processed or withdrawn, the details about this notification will be deleted after two months.

5 WHAT ARE THE RIGHTS OF THE NOTIFIER

5.1 Vertrouwelijkheid

InAdmin RiskCo guarantees the confidentiality of the notification and the identity of the notifier, if the notifier expressly asks for it.

The notifier is not the only one who deserves protection. Any possible witnesses and other parties involved in the wrongdoing or the suspicion thereof also qualify; after all, they are innocent until proven guilty.

5.2 No penalisation

Neither will InAdmin RiskCo penalise a notifier. Penalisation is when an employer treats the notifier worse after they have filed a report than if a report was never filed. Examples of penalisation are dismissal, involuntary reassignment or refusal of a promotion. This is prohibited by law.

Does the notifier nevertheless feel that he/she is being penalised? Then he/she can ask the Investigation Department of the Dutch Whistleblowers Authority to start an investigation into the way he/she is being treated. This request can also be made while the internal investigation into wrongdoing is still ongoing. Before the notifier starts the investigation, he/she must indicate internally that he/she feels penalised.

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