



Whistleblowing Policy

Version Control Sheet

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Whistleblower Policy – Reuzado ICT Services

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1. Objective

Reuzado ICT Services is committed to integrity, transparency, and accountability. This Whistleblowing Policy provides a safe and confidential way for employees and third parties to report potential misconduct.

This Whistleblower Policy provides information about the policy of Reuzado ICT Services, enabling individuals to report illegal, unethical, or improper conduct within or related to the activities of Reuzado ICT Services. This policy complements the regular reporting channels.

This procedure should be read in conjunction with the Reuzado Code of Conduct.

2. What is whistleblowing?

Whistleblowing is the act of reporting violations of laws or regulations or serious misconduct within or by Reuzado ICT Services. The reporter, known as the "whistleblower," may submit a report confidentially or anonymously and is protected from retaliation if the procedure is followed correctly.

3. Who can report misconduct?

This policy applies to all legal entities affiliated with Reuzado ICT Services, all employees, and any individuals or entities working for or with Reuzado ICT Services, as well as third parties with a reasonable suspicion of misconduct.

4. What types of misconduct can be reported?

The reporting channel may be used for all forms of fraud and serious misconduct, including but not limited to:

- A criminal offense
- Violations of legislation or Reuzado ICT Services' internal policies
- Health or safety risks
- Mismanagement
- Discrimination, harassment, or other unethical behavior
- Financial or tax irregularities
- Fraud
- Environmental harm
- Concealment of the above

5. How to report

5.1 Internal channels

Employees may report concerns to their supervisor, HR, or the external confidential advisor. Contact information can be found in the employee handbook or via Humanwave.

- Reuzado ICT Services provides an online form for anonymous and confidential reporting. The link to the Concern & Complaint Submission Form can be found here: [Concern & Complaint Submission Form](#)
- Third parties may contact whistleblowing@reuzado.nl or send a letter to Reuzado ICT Services, Attn. Legal Department, Haarlemmerstraatweg 103, 1165 MK Halfweg, The Netherlands.

5.2 External channel

Reuzado ICT Services encourages the use of the internal reporting channel first. In situations where this is not appropriate, reporting to an external authority may be justified, such as a regulatory body, the Dutch Data Protection Authority, Whistleblowers Authority or the Public Prosecution Service.

External reporting may be appropriate in the following cases:

- In case of imminent danger with a serious and urgent public interest
- If there is a legal obligation to report externally
- If previous internal reports have not received a sufficient response
- If there is a risk of evidence being destroyed or concealed

5.3 What information should be included in a report?

A report should ideally include:

- Date, time, and location
- Names and roles of those involved
- Relationship to the individuals involved
- Nature of the concern
- How the concern came to light
- Any potential witnesses, etc.

Providing contact details is not required but can help facilitate follow-up communication.

6. Investigation

The designated investigator (hereinafter: Whistleblower Investigator) is responsible for:

1. Conducting an investigation into the report
2. If necessary, forming a confidential investigation team
3. Informing the whistleblower about the progress; acknowledgement is provided within 7 days, with feedback within 3 months
4. Protecting the whistleblower's identity unless legally required or with explicit consent
5. Reporting to authorities or filing a formal complaint if needed
6. Protecting the rights of the person reported

In case of doubt or conflict of interest, the case will be transferred to another investigator. The investigator reports anonymously to management.

7. Management guarantees

Reuzado ICT Services' management ensures that all reports are investigated fully, objectively, within a reasonable timeframe, and with the highest level of confidentiality. Findings are evaluated and appropriate measures are taken if necessary.

8. Protection of the whistleblower

Reuzado ICT Services guarantees that whistleblowers acting in good faith are protected against retaliation or adverse treatment. If such occurs, it may be escalated to management or the compliance officer.

Any instruction to discourage or prevent reporting is considered a breach of policy. Malicious or false reports are not protected under this policy and may lead to sanctions.

9. Protection of the reported person

Reuzado ICT Services also protects the rights of the person(s) being reported. They will be informed about the investigation unless doing so would compromise the process. The identity of the whistleblower will not be disclosed.

10. Information for employees and third parties

Reuzado ICT Services will ensure awareness of this policy throughout the organization via the employee handbook, SharePoint, and the website. The goal is to provide an accessible and effective reporting channel.

11. Data protection information

11.1 What personal data do we process?

Reports may contain personal data of whistleblowers, reported individuals, or third parties, such as name, role, relationship, report content, or special categories of data such as origin, religion, political opinion, union membership, or health information.

11.2 Why do we process your personal data?

Reuzado ICT Services processes personal data for:

- Handling and following up on reports
- Preventing misconduct
- Legal compliance
- Processing special data in the public or vital interest, or for occupational health (if applicable)
- Reporting criminal offenses where legally permitted, in accordance with GDPR Article 10
- Legal compliance or legal defense

11.3 What are your rights?

If Reuzado processes personal data about you, you may (under certain conditions) have the right to access, rectify, erase, restrict processing, and object. Possible exceptions:

- Delay or limitation with justification
- Anonymization of whistleblower or third-party data
- No access if this would violate others' rights

You may exercise your rights by contacting: whistleblowing@reuzado.nl.

11.4 With whom do we share your personal data?

We only share personal data when necessary with:

- Investigators
- External advisors (e.g., legal)
- Government or enforcement bodies
- Other parties as legally required

11.5 How long do we retain your personal data?

Reuzado retains personal data for no more than two years after the case is closed, unless a legal procedure requires longer storage.

11.6 Contact details

For questions about your rights: whistleblowing@reuzado.nl

This Whistleblowing Policy and Procedure has been reviewed and approved by the Management Team of Reuzado ICT Services.

It forms part of Reuzado's integrity and compliance framework, alongside the Reuzado Code of Conduct and KYC Policy.

Approved by: Reuzado Management Team

Date: July 2025

Next Review: July 2026