

Whistleblower scheme Ooms & Partners

General

In addition to the normal complaints procedure, Ooms & Partners also has a whistleblower procedure.

This arrangement means that employees and persons from outside the organization can, without danger for their legal position, raise alleged irregularities. Someone who makes use of this whistleblower policy can, in contrast to the normal complaints procedure, submit a report anonymously to the confidential counselor of Ooms & Partners.

Where applicable?

The whistleblower policy applies in case of one of the following (alleged) irregularities.

A reasonable suspicion with regard to Ooms & Partners and/or its employees in connection with:

- a. an (imminent) criminal offense;
- b. a (threat of) destruction or manipulation of information about the aforementioned facts;
- c. a (threat of) deliberate misinformation;
- d. an (imminent) violation of laws or regulations;
- e. an (imminent) violation of internal regulations of Ooms & Partners or
- f. other situations that, in the opinion of the reporter, should be reported to the confidential counselor.

PROCEDURE:

Notification

1. An employee or an external third party who believes that there is an (alleged) irregularity, can report this to the confidential counselor.
2. The report can preferably be sent by e-mail to marco.ooms@oomsenpartners.nl.
3. It is also possible to respond in writing and send your response Strictly confidential to Ooms en Partners attn. M.A.H.G.M. Ooms, Verdilaan 9, 4837CL BREDA.
4. Within one week of receipt of the report, the confidential counselor will confirm the receipt of the report to the reporter. In this confirmation, the confidential counselor also mentions the procedure and the term for handling the report.
5. No later than four weeks later, the confidential counselor will inform the reporter which measures are taken and how the further processing will proceed. In the special situation that this message cannot be done within the period of four weeks, the confidential counselor will report this to the reporter and indicates the period within which the settlement will still take place.

Handling

1. The confidential counselor immediately informs the management and the compliance officer of Ooms & Partners. The confidential counselor informs the reporter about this.

2. Immediately after receiving the report, the compliance officer of Ooms & Partners will start an investigation into the (alleged) irregularity.
3. The compliance officer is authorized to obtain external (legal) advice if he deems this necessary, his tasks and authorities are otherwise laid down in the quality control system of Ooms & Partners.
4. The compliance officer reports in writing to the management about his findings. This report contains also an advice on any measures to be taken by the management.
5. If the management wishes to deviate from the advice, this will be discussed with the compliance officer.
6. If the report concerns the compliance officer, the management will investigate the (alleged) irregularity or let someone else investigate it.

Confidentiality and Protection

1. The report is made under complete secrecy and confidentiality. This also applies to the correspondence about and the handling of the report.
2. The reporter can release the confidential counselor from his duty of confidentiality, only in writing.
3. The management of Ooms & Partners guarantees that reports to the confidential counselor on the basis of this whistleblower policy will in no way have a (negative) influence on the employee's performance within Ooms & Partners or on the employee's career opportunities.
4. If the reporter publicizes the report directly or via third parties, this reporter can become a reporter charged by Ooms & Partners.

Breda, 15 July 2021

Ooms and Partners B.V.