

Objective:

Malpractices (including undesirable behaviour) can occur in all organisations and have a negative impact on both the organisation and the working environment. These malpractices can jeopardize Greenpack's good name as an entrepreneur and employer. It can also put pressure on relationships within the company if a person or certain group of people is hindered by this undesirable behaviour/misconduct, with as a result employees can no longer function properly.

Having a good policy for dealing with suspicions of malpractice (reporting policy) is therefore in the interest of both the organisation and its employees. Greenpack has an interest in ensuring that suspicions of malpractice are spotted and seriously investigated at the earliest possible stage, and that any malpractice found is dealt with appropriately. In doing so, employees must be confident that if they encounter suspected malpractice and report it, the organisation protects them as reporters from being disadvantaged as a result of having made a report.

At the workplace, each employee is responsible for their own behaviour and for setting boundaries, but also for discussing when these boundaries are violated. Managers are also responsible for the smooth running of the departments and know what the policy in this is within Greenpack.

Greenpack aims for a transparent and honest culture in which the employees take a centre stage and there is a team spirit. Employees must be convinced that they are not only there for Greenpack, Greenpack is also there for them.

Reporting procedure for Whistleblowers insightful:

This Whistleblower Reporting Procedure and its content is/will be communicated to employees through the memo boards within the company and through the digital Handbook via the intranet and Greenpack's personnel handbook.

What do we mean by malpractice (or suspicion thereof)?

Greenpack does everything it can to ensure that employees work in the safest possible way. Greenpack is also actively working to comply with all laws and regulations.

Malpractices are divided into 2 categories:

1. Infringement of a European Union regulation or directive in certain policy areas (breach of Union law)
2. Social malpractice

One speaks of malpractice if it appears that an employee, on reasonable grounds, suspects that within the organisation:

Breach of Union law

- A violation of a legal regulation / government order
- Financial services, products and markets, prevention of money laundering and counter-terrorism
- Product safety and product compliance
- Transport safety
- Protection of the environment
- Radiation protection and nuclear safety
- Food and feed safety, animal health and animal welfare are at risk
- Public health
- Consumer protection
- Protection of privacy and personal data

Social malpractice

- There is a violation or risk of violation of the law, violation or risk of violation of internal rules, which imply a concrete obligation with regard to a legal regulation, established by the employer.
- a danger to public health
- a danger to the safety of people
- a risk of environmental degradation
- a danger to the proper functioning of the organisation as a result of improper acts or omissions
- (a threat of) deliberately withholding, destroying or manipulating information about the above mentioned facts

The social interest is at stake if the act or omission not only affects personal interests and there is a pattern or structural character or if the act or omission is serious or extensive.

Greenpack would like to see that in addition to the malpractices indicated in the WbK (Whistleblowers Protection Act), the smaller integrity violations such as, for example, those listed below, are also reported:

- end products falling outside specifications
- abuse of position / authority
- conflict of interest
- leakage of confidential information
- abuse of information

What to do in such a situation?

Greenpack believes it is important that problems are initially reported and resolved mutually. However, sometimes this is not possible, or the problem is so serious and/or sensitive that it is not possible for the employee and/or manager to solve it among themselves. Fear of losing the job or a deteriorating work atmosphere are not reasons to accept undesirable behaviour.

Within Greenpack there are various other options for employees to report (suspected) malpractice. These malpractices can always be reported to a manager, the personnel committee (PVT), P&O department or to one of the confidential advisers within the organisation. Anonymous reports or a report with name are possible via intranet.



Who can make a report?

Every employee can be confronted with (a suspicion of) malpractice. It is therefore important that the reporting procedure is not only open to permanent employees, temporary workers and trainees. But also for people with whom Greenpack has a past and future working relationship. This includes in any case employees, civil servants, self-employed persons (e.g. consultants, freelancers, contractors, suppliers), shareholders & directors, volunteers and paid or unpaid trainees, personnel of contractors and suppliers, ex-employees and other persons whose working relationship has ended, job applicants and other persons whose working relationship has yet to commence.

For former employees and other people with whom Greenpack had a former working relationship, it must be possible to report a suspicion of malpractice within 12 months after the end of the employment contract.

To whom and how can a report be made?

It is very important for employees to know to which staff members or where within the organisation they can report (a suspicion of) malpractice. As it may involve serious or extensive malpractice, but also smaller malpractice, it is preferable to give the reporter the choice of which staff member to report to and that the anonymous variant is also available.

Internally, an employee who suspects malpractice or a violation of integrity within Greenpack can contact managers, the personnel committee (PVT), P&O department or to one of the confidential advisers within the organisation.

An anonymous report or report with name can also be made via the intranet using the report button:

Reports (anonymous or with name) made via the report button will be reported to the employer by the quality assurance department.



The suspicions of malpractice or integrity violation can be reported externally to, among others, the confidential advisor of the ARBO service: ARBO.nu

The report can be made in writing or verbally. The verbal report can be made by telephone, using a voice message system (e.g. voicemail/voice message via WhatsApp) or in person. Those involved in handling the report will not reveal the identity of the reporter without the reporter's written permission and will treat the information in the report confidentially.

The verbal reports must also be stored. The person who accepted the verbal report can save the report in the following ways:

- record the conversation (with prior permission from the reporter) and save it as such
- an accurate written record (report) of the conversation. The reporter is given the report for inspection and can then indicate any corrections and must approve the final report before it is saved.

Advice and support for the reporter:

It is very important for employees who are faced with a suspicion of malpractice and are considering reporting it or have already reported it, that they are given the opportunity to ask for advice and support. Good advice and support for the reporter at the earliest possible stage ensures that the reporter is not left alone. But it can also help prevent the situation from escalating and the difference of opinion regarding a suspected malpractice leading to an escalating personal conflict. This is in the interests of the reporter, but certainly also in the interests of the organisation.

Ask advice from:

Within the organisation, the employee can receive advice and support from a colleague, the internal confidential adviser or from the external confidential adviser at the ARBO service or seek information at www.huisvoorklokkenduiders.nl.

Follow-up steps:

The employer must register all reports they receive and maintain them in an overview. The reports in the overview will be destroyed if they are no longer necessary to comply with the requirements of the WbK or other requirements laid down by law or Union law.

The employer must send a confirmation of receipt to the reporter within 7 days of receiving an internal report of suspected malpractice. The reporter must then be provided with information about the assessment of the report within 3 months after sending the confirmation of receipt. And, if applicable, information will also be provided about the follow-up regarding the report.

What is a confidential advisor?

There are several confidential advisers in the organization, as well as an external confidential advisor. A confidential advisor is someone who is available to employees to provide independent support and advice on how the employee could deal with malpractice. The confidential advisor fulfills an honest and advisory role in this. Reporting the malpractice is subject to complete secrecy and confidentiality, unless the reporter indicates otherwise.

Confidential advisor Greenpack intern Ben van Waveren Mail: ben@green-pack.nl  06 - 30169978 	Confidential advisor Greenpack intern Viktorija Ralickaite Mail: viktorija@green-pack.nl  06 - 10097549 
Confidential advisor extern (Arbo service) Outside Greenpack, employees can contact the Arbo service Arbo.nu for advice and support	
 Ad	 +31 (0) 174 253 010
Mail: info@arbo.nu Visiting address: Poeldijkseweg 1 c, 2291AG Wateringen	
Advice and support: Arbo service: info@arbo.nu of +31 (0) 174 253 010 www.huisvoorklokkenuitdagers.nl	

Confidential handling of the identity of the reporter

It is very important for the reporter that his/her identity is treated confidentially.

The person to whom the report is made and those involved in dealing with it are not allowed to reveal the identity of the reporter, unless the reporter gives explicit written permission to do so.

It is important that all those involved realise why it is so important that the report and the identity of the reporter are treated confidentially. The priority is that the identity of the reporter is treated confidentially.

Protection of reporter and others:

There is a general prohibition of disadvantage, which means that the employer may not disadvantage the reporter (of suspected malpractice) because of the report. However, the reporter must of course have made the report in accordance with the WbK (Whistleblowers Protection Act). The person who assists the reporter, third parties involved and independent advisors also fall under the prohibition of disadvantage, e.g. confidential advisers, colleagues, family members, external experts.

The disadvantage includes, amongst other things:

1. early termination or non-renewal of a temporary employment contract
2. failure to convert a temporary employment contract into permanent employment
3. taking a disciplinary measure
4. imposing an investigation, speaking, workplace and/or contact ban on the reporter or colleagues of the reporter
5. the imposed appointment to another position
6. expanding or limiting the duties of the reporter, other than at his or her own request
7. relocating or transferring the reporter, other than at the reporter's own request
8. refusing a request to move or transfer the reporter
9. changing the workplace or refusing a request to do so
10. withholding salary increase, incidental reward, bonus, or granting allowances
11. withholding promotional opportunities
12. not accepting a sick report, or leaving the employee registered as sick
13. rejecting a leave request
14. granting leave other than at the employee's own request

Reporters cannot be held liable for making a report and are therefore protected against a lawsuit. This includes defamation, disclosure of trade secrets, violation of copyright or the obligation of confidentiality, if they rightly assume that this is necessary to reveal the reported malpractice.

If further investigation shows that the reporter has wrongly raised the suspicion of malpractice out of malicious intent or with the intention of deliberately harming another person, the management will take action in all cases. In this case, the employee is responsible for his/her own actions and cannot rely on protection against disciplinary measures and/or criminal prosecution.

Involvement of the Personnel Committee (PVT):

This whistleblowing procedure has been drawn up with the approval of the Greenpack Personnel Committee (PVT). If adjustments to the procedure are required in the future, approval from Greenpack's PVT will be requested again.

The PVT will also receive annual written information about the operation of the reporting procedure for the past year. And the expectations for the following year regarding the reporting procedure will also be shared with the PVT.