



# Veromatic

INTERNATIONAL

## Reporting scheme

Regulations concerning the handling  
of a suspicion of a wrongdoing



## Introduction

Veromatic International BV considers it important that employees and external parties can adequately and safely report any suspected wrongdoing at Veromatic. That is why good and clear regulation is important. This whistleblower procedure explains which suspicions of abuse can be reported, where and how.

This abuse reporting procedure is not intended for personal complaints from employees about them personally regarding matters related to work, sexual harassment, bullying, aggression or violence. For this we have the regulation of undesirable behavior. Nor does the procedure relate to employees' conscientious objections in connection with the performance of normal business activities. Of course, the regulation is not intended in principle to criticize the policy choices made by Veromatic.

### The scheme applies to:

- persons who now or in the past work at Veromatic International B.V. (have) performed, with or without an employment contract or appointment. This includes current employees and former employees, but also self-employed people, volunteers, flex workers and trainees;
- employees of other organizations who, for example, work for your organization as a contractor, subcontractor, cooperation partner or temporary worker.

## Objective

It is important to handle with care a suspicion of abuse. A careless procedure can lead to major damage, both for Veromatic and for the reporter. Care is promoted by drawing up an adequate procedure. We see reporting an abuse as a contribution to improving the functioning of our organization. A good procedure helps every employee to report a suspicion of wrongdoing, that all reports are treated seriously and according to a certain procedure, that measures are taken if necessary and that the (potential) whistleblower personally does not experience any negative consequences of his report. A clear, adequate procedure for reporting misconduct also encourages the employee to make his report at the correct "counter", so that action can be taken if necessary.

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<sup>1</sup> As long as the reporting of a suspected wrongdoing takes place within Veromatic, there is no whistleblowing. This is only the case as soon as the employee makes the suspicion of wrongdoing known externally.

## 1. What is a misunderstanding or irregularity

### 1.2 A misunderstanding

The suspicion of an employee that within the organization in which he works or has worked or at another organization if he has come into contact with that organization due to his activities, there is an abuse if:

- 1e. the suspicion is based on reasonable grounds that arise from the knowledge that the employee has gained from his employer or from the knowledge that the employee has gained from working at another company or organization, and
- 2e. the social interest is at stake in:
  - i. the (imminent) violation of a legal provision, including an (imminent) criminal offense, ii. an (imminent) danger to public health,
  - iii. an (imminent) danger to the safety of persons,
  - iv. an (imminent) risk of environmental degradation,
  - v. an (imminent) danger to the proper functioning of the organization as a result of improper conduct or omission,
  - vi. an (imminent) violation of rules other than a legal regulation,
  - vii. an (imminent) waste of government money,
  - viii. (a threat of) the deliberate withholding, destruction or manipulation of information about the facts mentioned under i up to and including vii above;

### 1.3 An irregularity

A reasonable suspicion of an imperfection or injustice of a general, operational or financial nature that takes place under the responsibility of the organization and is so serious that it falls outside the regular work processes and exceeds the responsibility of the immediate superior.

## 2. Who can you report to?

Everyone who at Veromatic International B.V. works can make a report to every person within Veromatic International B.V. occupies a higher hierarchical position. Also people who are not at Veromatic International B.V. are employed, but due to work with Veromatic International B.V. come into contact can make a report. The same guidelines apply here as for a report from an employee of Veromatic International B.V. Reports always end up with the Managing Director (see HS 4)

### 2.1 Inside Veromatic International BV

If you suspect an abuse or irregularity within Veromatic International B.V. You can report this to the Confidential Counselor or your supervisor. If the report relates to your manager, you can report it to your manager's manager. If you have a reasonable suspicion that the Managing Director is involved in the suspected wrongdoing or irregularity, the report is immediately made externally (see HS 5).

### 2.2 The confidant<sup>2</sup>

The confidential adviser is a person appointed by Veromatic International B.V. appointed person with confidentiality obligation that you as an employee can consult in confidence about a suspicion of an abuse. The confidential adviser can be consulted in confidence for information, advice and support in the event of a suspicion of an abuse / irregularity. The confidential counselor can also be asked for advice in case of doubt about making a report. A report can also be made directly to the external confidential adviser. The counselor forwards the report, in consultation with you, to a manager within Veromatic International B.V.

### 2.3 The house for whistleblowers

"The Whistleblower House" can advise employees with a suspicion of misconduct with a social interest on a possible report and can investigate this suspected misconduct and the way in which Veromatic International B.V. behaved towards the reporter.

Before an investigation is initiated by the advice point, the possibility of an internal report and internal investigation at Veromatic International BV will always be considered first, unless there are good reasons to immediately report externally (see HS 5).

Note: With irregularities you cannot go to the whistleblower advice point, these can only be reported internally or to the confidential adviser.

More information about "The House of Whistleblowers" [huisvoorklokkenluiders.nl](https://huisvoorklokkenluiders.nl)

## 3. How can you make a report?

### 3.1 Confidentiality

- Completely anonymously (for example, sending a letter without a sender) is not possible, the reporter always discloses his or her identity to the reporting party. It is then up to the reporter to determine within the process to what extent they wish to remain anonymous.
- NB. The identity of the reporter is always handled confidentially. Which means that everyone involved in handling a report does not disclose the identity of the reporter without the express written consent of the reporter and treats the information about the report confidentially.
- The person to whom the report was made (the adviser) may also choose not to disclose the identity, anyone involved in handling a report does not disclose the identity of this person to whom the report was made without explicit notice. written consent of the reporter and the adviser.
- Information about a report is stored in such a way that it is only physically and digitally accessible for those involved in handling this report.

<sup>2</sup>Our confidential adviser is: Corina Versluis, [cv@veromatic.com](mailto:cv@veromatic.com) or phone 204

### 3.2 Making a report

- A report can be made orally or in writing. The person to whom the report is made will arrange for a written determination of the report in consultation with the reporter, and will submit this report to the reporter for approval (and signature). The reporter receives a copy of this.
- The person who made the report sends the report within a week to the Managing Director within Veromatic International B.V ..
- If the reporter or the person to whom the report was made has a reasonable suspicion that the Managing Director is involved in the suspected wrongdoing or irregularity, the person making the report will immediately forward the report to an external party (H5).
- The Managing Director will send the reporter a confirmation within one week that the report has been received. The acknowledgment of receipt contains at least a business description of the notification, the date on which it was received and a copy of the notification.
- After receiving the report, the Managing Director, in consultation with the reporter (or the person to whom the report is made should the reporter wish to remain anonymous), appoints a contact person with a view to combating harm. This can also be the person who was initially notified.
- After making a report, together with the designated contact person it is mapped out which risks of harm are present, how these risks can be reduced and what you can do as a reporter if you believe there is harm. The contact person ensures that this is recorded in writing, and submits this document to the reporter for approval (and signature). The reporter receives a copy of this.
- When the report is made to the confidential adviser, he or she will be kept informed during the process, even if the reporter reveals the identity to Veromatic International B.V.

## 4. Handling of an internal report

### 4.1 Processing a report

1. The Managing Director conducts an investigation into the reported suspicion of misconduct or irregularity, unless:
  - a. the suspicion is not based on reasonable grounds, or
  - b. it is clear in advance that the reported does not relate to a suspicion of misconduct or irregularity.
2. If the Managing Director decides not to initiate an investigation, the reporter will be informed of this in writing within two weeks after the internal report with text and explanation.
3. The Managing Director assesses whether an external body must be notified. If Veromatic International B.V. inform an external body, the Managing Director will send a report to the notifier, unless there are serious objections.
4. The Managing Director assigns the investigation to investigators who are independent and impartial and, in any case, does not allow the investigation to be carried out by persons who may or may have been involved in the suspected wrongdoing or irregularity.

5. The Managing Director informs the reporter (or contact person) in writing that an investigation has been initiated and by whom the investigation is being conducted. The Managing Director sends the reporter a copy of the research assignment, unless there are serious objections. The Managing Director informs the persons to whom the report relates about the report and about notifying an external body, unless the research interest or the enforcement interest can be harmed as a result

### 4.2 The research

1. The investigators shall give the reporter the opportunity to be heard and may also hear others. The investigators are responsible for a written determination of this, and present it for approval and signature to the person who has been heard. The person who has been heard will receive a copy of this.
2. The researchers can within Veromatic International B.V. view and request all documents that they deem reasonably necessary for conducting the investigation.
3. Employees may provide investigators with all documents that they consider necessary for the investigators to take note of in the context of the investigation.
4. The researchers prepare a draft investigation report and give the reporter the opportunity to comment on it, unless there are serious objections.
5. The researchers then determine the research report. They send the reporter a copy of this, unless there are serious objections.

### 4.3 The position of Veromatic International BV

Following the investigation report, Veromatic International B.V. a position with regard to the report.

1. The Managing Director informs the reporter in writing of the substantive position within eight weeks of the report. It is also indicated to which steps the report led. The persons to whom the report relates are also informed, unless this could harm the investigation interest or the enforcement interest.
2. If it becomes clear that the position cannot be given within the stipulated period, the Managing Director will inform the notifier in writing. It is also indicated within which period the reporter can view the position. If the total period is therefore more than twelve weeks, it is also indicated why a longer period is necessary.
3. Upon completion of the investigation, the Managing Director or an external body assesses the internal report, the investigation report and the position of Veromatic International B.V. be informed. If Veromatic International B.V. inform an external body, we will send a report to the notifier, unless there are serious objections.

### 4.4 Hear and be heard

1. Veromatic International B.V. gives the reporter the opportunity to view the investigation report and the position of Veromatic International B.V. to respond.
2. If the reporter responds to the investigation report or the position of Veromatic International B.V. substantiated indicates that the suspicion of an irregularity or wrongdoing has not been investigated effectively or properly, or that the research report or position mentions

material inaccuracies, Veromatic International B.V. responds. substantively and, if necessary, initiate a new or additional investigation.

3. If Veromatic International B.V. inform or have informed an external body, the aforementioned reaction of the reporter to the investigation report and the position of Veromatic International B.V. sent to that external body. The reporter receives a copy of this.

## 5 Report externally

Veromatic International B.V. would like to be given the opportunity to resolve an abuse or irregularity yourself. But after you have made an internal report it is also possible to make an external report if:

1. you do not agree with the position of Veromatic International B.V. and are of the opinion that the suspicion has been wrongly set aside.
2. You have not received a position within the stipulated period.

You can also immediately make an external report if you cannot reasonably be asked to make an internal report first. This is the case when there is:

- breaking legal requirements
- acute danger, an important and urgent social interest requires immediate external reporting.
- a reasonable suspicion that the Managing Director is involved in the suspected abuse;
- a situation in which the reporter can reasonably be afraid of countermeasures in connection with making an internal report;
- a clearly identifiable threat of embezzlement or destruction of evidence;
- a previous comparable report (possibly by another reporter), after which the completed procedure has not eliminated the abuse;
- an obligation for direct external reporting.

### 5.1 Where can you report externally?

An employee can go to various authorities for an external report of an abuse in the company. In addition, an employee must look for the most appropriate agency for the situation he wants to report. For example, for an imminent violation of a tax law, it is probably best to go to the Fiscal Intelligence and Investigation Service (FIOD). There are various organizations that record whistleblower reports. For instance:

- Nationale ombudsman (NO) en gemeentelijke ombudslieden;
- Onderzoeksraad Integriteit Overheid;
- Openbaar Ministerie (OM);
- Fiscale Inlichtingen- en Opsporingsdienst (FIOD);
- Rijksrecherche;
- Sociale Recherche;
- NL Confidential met de onderdelen: Meld Misdaad Anoniem, Sektesignaal, MiND en de Vertrouwenslijn;
- College voor de Rechten van de Mens;
- Onderzoeksraad voor de Veiligheid (OVV);
- Nederlandse Zorgautoriteit (NZa);
- Autoriteit Consument & Markt (NMa);

Rijksinspectie met de onderdelen:

- Douane (Belastingdienst),
- Inspectie Leefomgeving en Transport (ILT),
- Inspectie Veiligheid en Justitie (Inspectie Ven)),
- Inspectie SZW (ministerie van Sociale Zaken en Werkgelegenheid),
- Nederlandse Voedsel- en Warenautoriteit (NVWA);
- Antidiscrimatievoorzieningen.

## 6 Make agreements about the prevention of after-treatment

### 6.1 Disadvantages by managers or colleagues

Veromatic International B.V. ensures that managers and colleagues of a reporter do not disadvantage him or her after having reported in good faith and duly reported a suspicion of misconduct or irregularity.

We understand this in any case:

- bullying, ignoring and excluding the reporter.
- making unfounded or disproportionate accusations with regard to the functioning of the reporter.
- the actual imposition of a research, speaking, workplace and / or contact prohibition on the reporter or colleagues of the reporter, in any way formulated.
- intimidating the reporter by threatening with certain measures or behavior if he continues his report.

Veromatic International B.V. addresses employees who are guilty of harming the reporter and can impose a warning or disciplinary measure on them.

### 6.2 Disadvantages of Veromatic International BV

Veromatic International B.V. will not disadvantage a reporter in good faith and duly report a suspicion of misconduct or irregularity.

By disadvantage we mean:

- granting discharge, other than at one's own request;
- the premature termination or non-renewal of temporary employment;
- not converting a temporary contract into a permanent contract;
- taking a disciplinary measure;
- the imposition of a research, speaking, workplace and / or contact prohibition on the reporter or colleagues of the reporter,
- the imposed appointment to another position;
- expanding or limiting the duties of the reporter, other than at his own request;
- moving or transferring the reporter, other than at his own request;
- refusing a request to relocate or transfer the reporter;
- changing the workplace or refusing a request thereto;
- withholding salary increases, incidental rewards, bonuses, or awarding allowances;
- remembering promotion opportunities;
- not accepting a sick report, or having the employee registered as sick.
- rejecting an application for leave;
- granting leave, other than at one's own request;

If one (or more) of the above measures is nevertheless taken after making a report, Veromatic International will justify B.V. why this measure is deemed necessary and that this measure is not related to the good faith and proper reporting of a suspicion of misconduct or irregularity. Veromatic International B.V. will also not disadvantage all other persons involved in a report (such as contact person and employees who are heard in the context of the investigation).

### **6.3 When you are disadvantaged after a report**

If a reporter is of the opinion that there is discrimination, this can be discussed with the contact person (as mentioned in 3.2). The Managing Director (or the research department of the House for Whistleblowers) may be asked to investigate the way in which Veromatic International B.V. the detector is dealt with. Together with the contact person it is discussed which measures can be taken to prevent disadvantage. The contact person ensures that this is recorded in writing, and submits this recording to the reporter for approval and signature. The contact person forwards the report to the Managing Director. The reporter receives a copy of this.

The Managing Director ensures that measures are taken to prevent disadvantage.

## **7 Annual overview**

Every year the HR department draws up a report in which the following information can be found:

- The policy pursued with regard to reporting suspicions of misconduct and irregularities conducted in the past year and any adjustments to the policy for the coming year;
- information about the number of reports and an indication of the nature of the reports, the results of the investigations and the views of Veromatic International B.V. ;
- general information about the experiences with counteracting the reporter's disadvantage;
- information about the number of requests for investigation into harm in connection with the reporting of a suspicion of abuse and an indication of the results of the investigations and the views of Veromatic International B.V.

The content of this report is made available to all employees and the counselor.



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