GRC+

Speak Up (Whistleblowing) Policy

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LATEST VERSION
grc.plus/speak-up

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Contents

1 Who can report 4

2 What you can report 4

3 How to report 4

4 What happens next 5

5 Confidentiality 5

6 Protection 5

7 External reporting 5

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We want to hear about suspected wrongdoing early, so we can deal with it. This policy explains how to report, what happens next and how you are protected. It follows the Dutch Whistleblower Protection Act (Wet bescherming klokkenluiders), which implements the EU Whistleblowing Directive (2019/1937).

1 Who can report

Everyone who works or has worked with GRC PLUS B.V. or its group companies: employees, directors, associates, interns, volunteers, job applicants, and staff of suppliers, partners and clients.

2 What you can report

- breaches of EU or national law, such as on data protection, anti-money launderingMeasures to prevent the financial system being used to launder the proceeds of crime. It is usually paired with CFT as AML/CFT, and the EU has set up a dedicated authority, AMLA, for it., competition, public procurement or tax;
- bribery, fraud or misuse of client or company money;
- risks to health, safety or the environment;
- serious breaches of our code of conduct or our professional independence;
- attempts to hide any of the above.

Personal complaints about your own working conditions are better raised directly with management, unless they concern wider wrongdoing.

3 How to report

- **In writing** to legal@grc.plus, marked “Speak up”. Only the people who handle speak-up reports can read this mailbox.
- **By phone or in person**: ask for a meeting with a member of management, within 7 days of your request. We record the conversation only with your consent, or write a summary you can check.
- **Anonymously**: you may report without giving your name, for example from a private e-mail address. We can then only follow up through that address.

If the report concerns a member of management, write to legal@grc.plus and ask for it to go to our external adviser; we will name that person in our reply so you can contact them directly.

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4 What happens next

- We confirm receipt within 7 days.
- The report is handled by someone who is not involved in the matter.
- We look into it carefully and confidentially, and may ask you for more information.
- You receive feedback on what we are doing within 3 months of the confirmation.

5 Confidentiality

Your identity, and anything that could identify you, is shared only with the people who need it to handle the report, unless you agree otherwise or the law requires it. Reports are kept securely and deleted when they are no longer needed.

6 Protection

Nobody may be disadvantaged for reporting in good faith, or for helping someone who reported: no dismissal, demotion, loss of work, bad references or intimidation. Retaliation is a serious breach of this policy. Under Dutch law, the burden of proof is on us to show that a measure against a whistleblower was not related to the report.

7 External reporting

You can also report directly to a competent authority, such as the Dutch Whistleblowers Authority (Huis voor Klokkenluiders), the Dutch Data Protection AuthorityAn independent public body that supervises compliance with data protection law. Under the GDPR, such authorities monitor and enforce its application, handle complaints and exercise investigative and corrective powers., or the authority for the area concerned. The Huis voor Klokkenluiders also gives free, confidential advice.

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