

7. GOGLA Whistleblowing Policy

7.1 Introduction

GOGLA requires its Representatives, Staff and Contractors to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. All Representatives and Third Parties must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations. This Policy is to encourage and protect Representatives and Third Parties who have serious concerns about matters of public interest to come forward.

7.2 Scope

This Policy applies to all GOGLA Representatives, Staff and Contractors.

7.3 Reporting Responsibility

This Policy aims to encourage GOGLA Representatives, Staff and Contractors who have a Suspicion of misconduct to come forward and voice those concerns. It is their responsibility to report any Suspicion of misconduct, including (amongst others) any violations of GOGLA’s Guidelines for Corporate Social Responsibility, and/or suspected violations of law and/or regulations that govern GOGLA’s operations.

7.4 No Retaliation

It is against GOGLA’s values for anyone to retaliate against any GOGLA Representatives, Staff and Contractors who, in good faith, reports a Suspicion of misconduct. Retaliation against a Whistleblower will be subject to disciplinary measures up to and including termination of employment.

7.5 Internal Reporting Procedure

GOGLA has an open-door policy and suggests that GOGLA Representatives, Staff and Contractors can report their suspicion of misconduct to their manager, or their contact person at GOGLA. If a GOGLA Representatives, Staff and Contractors has no manager/contact person, is not comfortable speaking with their manager/contact person, or is not satisfied with their manager’s/contact person’s response, they are encouraged to speak with the Executive Director, a member of the Management Team, or a member of the Board of Directors. Managers and other authorized GOGLA representatives are required to report any report of a suspicion of misconduct that was raised with them, in writing to the Executive Director, who will decide on whether or not to open an investigation.

Executive Director	Koen Peters	k.peters@gogla.org	06-33988898
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Should the suspicion of misconduct concern GOGLA’s Executive Director, the manager or other authorized GOGLA representative who received the report will raise the matter in writing with the Chair of the Board of Directors who will decide on whether to open an investigation.

Reporting can also be done anonymously [mechanism and process to be defined].

7.6 Acting in Good Faith

Anyone reporting a Suspicion of misconduct must be acting in good faith and have reasonable grounds for the suspicion. Any allegations that prove not to be substantiated and which prove to have been

made maliciously or knowingly to be false, will be viewed as a serious disciplinary offense and will result in appropriate measures.

7.7 Confidentiality

A Suspicion of misconduct may be reported on a confidential basis by GOGLA Representatives, Staff and Contractors. Reports of a Suspicion of misconduct will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

7.8 Handling of Reported Violations

GOGLA's Executive Director will notify the party who submitted a Suspicion of misconduct and acknowledge receipt of the reported Suspicion of misconduct. It will be promptly decided on whether or not to open an investigation and which appropriate follow up actions will be taken, if any. Should the suspicion of misconduct concern GOGLA's Executive Director, the Chair of the Board of Directors will take these actions.

7.9 External Contact

It is encouraged to first discuss such concerns internally within GOGLA. However, if for any reason, GOGLA Representatives, Staff and Contractors feel unable to raise the matter within GOGLA, or feel that GOGLA did not address their concern, or wish to consult an external party beforehand, they can contact the designated GOGLA external confidant or bring the issue to the attention of the Dutch House for Whistleblowers (www.huisvoorklokkenluiders.nl/onderzoek-naar-een-misstand/verzoek-tot-onderzoek).

7.10 List of definitions

Violence and harassment: any form of verbal, non-verbal or physical conduct, or threats thereof, that aims at, results in, or is likely to result in physical, psychological, sexual or economic harm, and includes gender-based violence and harassment.

GOGLA Representatives: members of the Board of Directors, members of the Advisory Board, GOGLA Employees and volunteers.

Third Parties: intermediaries, agents, consultants, advisors, distributors, and others acting on behalf of GOGLA, as well as anyone (other than GOGLA Employees) who performs or have performed work for GOGLA.

Suspicion of misconduct: the suspicion of a GOGLA Representatives, Staff and Contractors that, within GOGLA, or at another organization if a GOGLA Representatives, Staff and Contractors has come into contact with that organization due to its work for or with GOGLA, there is a misconduct to the extent that:

- the suspicion is based on reasonable grounds arising from the knowledge that the GOGLA Representatives, Staff and Contractors have gained at GOGLA, or from the knowledge that they have gained from working at another company or organization; and

- the social interest is at stake with the violation of a legal provision, a public health hazard, a safety hazard to persons, a danger to the environment, a danger to the proper functioning of the public service or an enterprise as a result of improper conduct or omission.

This policy was approved by the GOGLA Board of Directors on 26 May 2021.