



Blycolin
Whistleblower Policy

VERSION AUGUST 2025



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1 Introduction

Blycolin aims to ensure transparency in their organizational governance and conduct business based on honesty, trust, and clear agreements. To uphold these standards, Blycolin encourages its employees, suppliers and other stakeholders who suspect misconduct within the company or its value chain, such as criminal acts, financial irregularities, or situations that may endanger personnel or third parties, to report these issues without fear of punitive measures or unfair treatment.

The CEO of Blycolin is authorized to take measures to prevent or stop unacceptable behavior that harms the company, employees, or third parties.

This procedure related to the whistleblower policy enables employees, suppliers, and other stakeholders to report suspected misconduct at an early stage. Reporters are not expected to provide detailed proof to substantiate their claims. However, they must demonstrate that there is reasonable cause to suspect misconduct.

We encourage our employees and all our stakeholders to address violations of conduct or legal regulations directly with one another. If internal reporting proves impossible, should employees and all our stakeholders consider raising their concerns outside the organization.

The whistleblowers policy enables employees and stakeholders to make a Speak Up (whistleblowing) report.

The core of this policy is that whistleblowers acting in good faith are entitled to protection, provided they act diligently, both procedurally and substantively.

A whistleblower policy contributes to the effective handling of misconduct and its prevention. However, this procedure is not the only way Blycolin seeks to prevent misconduct. We adhere to the principles of having one goal, talking to one another, agreeing that agreements are binding, and respecting each other. Promoting an open culture that values integrity and the expression of criticism or addressing behavior is crucial.



2 Definitions

1. Blycolin:

All legal entities of the group and its subsidiaries.

2. Reporter:

A natural person who reports or publicly discloses information on misconduct acquired in the context of his or her work-related activities;

3. Report:

An verbal or written notification of (suspected) misconduct within Blycolin or its value chain.

4. Misconduct:

Acts or omissions that are in conflict with our Inters & Extern Code of Conduct, and/or that consist of a matter of public interest concerning at least one of the following:

- (Impending) violation of a legal provision.
- (Impending) danger to public health.
- (Impending) danger to consumer safety.
- (Impending) danger to personal safety.
- (Impending) danger to the protection of privacy and personal data, and security of network and information systems.
- (Impending) harm to the environment, for example in relation to GHG emissions, pollution, and resource use and waste management.
- (Impending) danger to the proper functioning of public services, the internal market, or businesses due to improper actions or omissions, including corruption and fraud.

This includes acts or omissions that have already taken place, that have not yet materialized, but are very likely to take place, acts or omissions which the reporting person has reasonable grounds to consider as misconduct, as well as attempts to conceal misconduct.

5. Suspicion of misconduct:

The reporter has suspicion based on reasonable grounds to believe that the information on the misconduct reported was true at the time of reporting.

6. Facilitator:

A natural person, appointed by the reporter, who assists the reporting person in the reporting process in the work-related context, and whose assistance is confidential;

7. Reporting Officer/Partner:

An impartial individual or the third-party Speak Up designated by management to act as the reporting officer within the whistleblower policy, including trusted persons appointed by management.

8. Competent authority:

Any national authority designated to receive reports in accordance with Chapter III of EU Directive 2019/1937 and give feedback to the reporting person, and/or designated to carry out the duties provided for in the Directive, in particular as regards follow-up. With exceptions specified in Chapter 8, this includes:

- Authorities responsible for investigating criminal offenses, such as the Public Prosecutor.
- Authorities supervising compliance with legal provisions, like the Labor Inspectorate.
- Other competent organizations where suspected misconduct can be reported, such as the Whistleblowers' Authority.

9. External reporting:

Oral or written communication of information on breaches with legal provisions and/or matters of public interest as mentioned in paragraph 1.4 such as competent authorities.

10. Person concerned:

Natural or legal person who is referred to in the report or public disclosure as a person to whom the misconduct is attributed or with whom that person is associated.

11. Retaliation:

Any direct or indirect act or omission which occurs in a work-related context, is prompted by internal or external reporting or by public disclosure, and which causes or may cause unjustified detriment to the reporting person. This includes all forms of retaliation mentioned in Article 19 of EU Directive 2019/1937 on the protection of persons who report breaches of Union Law, such as:

- Dismissal, suspension or lay-off
- Demotion or withholding of promotion
- Withholding of training
- Negative performance assessment or reference
- Coercion, intimidation, or harassment
- Discrimination or unfair treatment

12. Follow-up:

Any action taken by the recipient of a report or any competent authority, to assess the accuracy of the allegations made in the report and, where relevant, to address the breach reported, including through actions such as an internal enquiry, an investigation, prosecution, an action for recovery of funds, or the closure of the procedure;

13. Feedback:

The provision to the reporting person of information on the action envisaged or taken as follow-up and on the grounds for such follow-up.

3 Scope

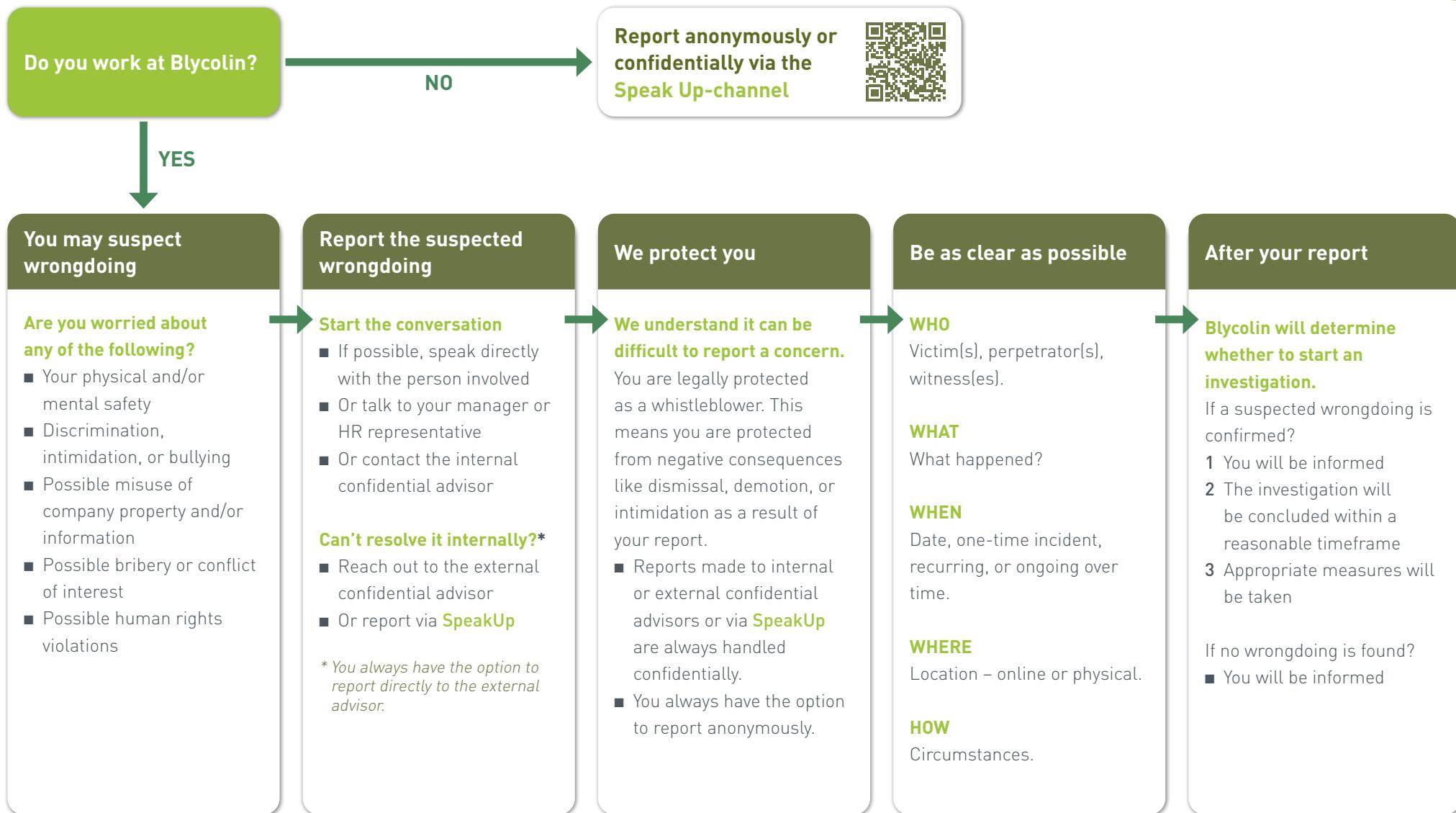
1. This policy applies to reporting persons working in the private or public sector who acquired information on misconduct in Blycolin's work-related context including, at least, the following:

 - a. persons having the status of worker, within the meaning of Article 45(1) TFEU, including civil servants, part-time workers and agency workers;
 - b. persons having self-employed status, within the meaning of Article 49 TFEU;
 - c. shareholders and persons belonging to the administrative, management or supervisory body of Blycolin, including non-executive members, as well as volunteers and paid or unpaid trainees;
 - d. any persons working under the supervision and direction of contractors, subcontractors and suppliers.
2. This policy shall also apply to reporting persons where they report or publicly disclose information on misconduct acquired in the work-based relationship with Blycolin which has since ended.
3. This policy also applies to reporting persons whose work-based relationship is yet to begin in cases where information on misconduct has been acquired during the recruitment process or other pre-contractual negotiations.
4. The measures for the protection of reporting persons set out in this policy shall also apply, where relevant, to:

 - a. facilitators;
 - b. third persons who are connected with the reporting persons and who could suffer retaliation in a work-related context, such as colleagues or relatives of the reporting persons; and
 - c. legal entities that the reporting persons own, work for or are otherwise connected with in a work-related context.



4 Summary of procedure



5 Internal Reporting

1. The reporter informs the reporting officer or “Speak Up” about suspected misconduct in accordance with the procedure described in this policy. If uncertain, the reporter can consult the reporting officer or Speak Up or a facilitator in good faith and without prejudice before making a formal report.
2. If the report concerns the reporting officer themselves, the reporter should address the report to management, a facilitator or Speak Up.
3. Any supervisor or manager who receives a complaint of misconduct that cannot be adequately addressed through normal management channels must immediately report the complaint through one of the additional channels of communication outlined above.
4. Reports should follow the procedure unless there are exceptional circumstances as outlined in Chapter 8 (External Reporting), Section 2.
5. The reporting officer or partner documents the internal report, including the date of receipt. With consent of the reporter, the reporting officer or partner has the right to document oral reports by making a recording of the conversation or through a complete and accurate transcript of the report prepared by the reporting officer. When the used channel does not allow for recording, the report is documented through accurate minutes prepared by the reporting officer. The reporting officer or partner has the reporter check, where necessary rectify, and sign the report for confirmation. The above also applies to records of meetings with the reporter. A copy is provided to the reporter. The reporting officer or partner informs the management promptly, in a manner agreed upon with the reporter.
6. During the investigation, all reports and meeting records are kept in durable and retrievable form.
7. An investigation begins as soon as possible after receiving the internal report. In consultation with management or the facilitator, the reporting officer evaluates whether an external report is required. The reporting officer and management may retain and/or consult with external auditors, external legal counsel and other experts, on a confidential basis, as necessary to investigate and resolve the (suspected) misconduct.
8. Complaints will be addressed by the persons assigned to investigate them with reasonable promptness, considering such factors as the nature, severity and complexity of the issue involved.
9. Both the reporter and the recipient of the (suspected) misconduct must handle the report confidentially.



6 Reporting Officer

1. The reporting officer acts as the process guardian for the reporting procedure.
2. The reporting officer must function with authority, credibility, and independence from the management of Blycolin.
3. If the reporting officer is an employee of Blycolin, the legal protections of [insert relevant local Article and Act if applicable]

7 Facilitator

1. The reporter may involve a facilitator for guidance regarding the report of (suspected) misconduct and may choose to be represented by them.
2. If the facilitator is an employee of Blycolin, they are entitled to the legal protections mentioned in [insert relevant local Article and Act if applicable]



8 Feedback

Within seven days after sending the report, the reporting person receives an acknowledgment of receipt from the Reporting Officer or Speak Up.

Within eight weeks from the time of the internal report, the reporting officer or management provides the reporter with a written statement regarding the suspected misconduct.

This statement also specifies the steps taken in feedback to the report. The feedback will adhere to the confidentiality of (company) information and comply with applicable legal provisions, such as privacy regulations.

If the feedback cannot be provided within eight weeks, the management informs the reporter in writing, stating the expected timeframe for feedback. In principle, the timeframe from the acknowledgment of receipt to the feedback does not exceed three months, but if absolutely necessary this can be extended to six months if the complexity of the case requires a more lengthy investigation.



9 External Reporting

1. The reporter may consider reporting to an external party (such as competent authorities) after completing the internal reporting procedure if:
 - a. The reporter disagrees with the feedback and proposed actions outlined in Chapter 6 (Feedback) and believes the suspicion has been unjustly dismissed; or
 - b. The reporter has not received feedback within the specified timeframe, even after follow-up inquiries.
2. The reporter may consider directly reporting to an external party (such as competent authorities), bypassing internal procedures, if internal reporting cannot reasonably be expected. This applies in cases such as:
 - a. Immediate danger requiring urgent external reporting due to significant and pressing public interest.
 - b. A reasonable suspicion that the highest-ranking official in the organization is involved in the suspected misconduct.
 - c. Reasonable fear of retaliation resulting from internal reporting.
 - d. A clear risk of evidence being concealed or destroyed.
 - e. A previous report that failed to address the suspected public interest misconduct.
 - f. A legal obligation to report directly to an external party.
3. An external party may also include another external third party capable of directly or indirectly addressing the suspected misconduct. This is valid only if the reporter reasonably believes the public interest significantly outweighs the company's interest in confidentiality. The reporter must consider both the effectiveness of the chosen external party in addressing the misconduct and the company's interests. An external report should only be made when no other, less harmful alternatives are available.
4. Where a report is received through channels other than the reporting channels referred to in Table 1 or by staff members other than those responsible for handling reports, the staff members who receive it are prohibited from disclosing any information that might identify the reporting person or the person concerned, and that they promptly forward the report without modification to the staff members responsible for handling reports.

10 Legal Protection for the Reporter

1. The reporting officer will keep the identity of the reporter confidential where possible, unless disclosure is legally required. If maintaining confidentiality is not feasible due to necessary actions required to address the misconduct, the reporting officer will first contact the reporter to discuss this.
2. The reporter of [suspected] misconduct is protected under Directive (EU) 2019/1937 on the protection of persons who report breaches of union law. This means the reporter will not suffer any disadvantage because of their report. Specifically, the reporter will not be treated less favorably by Blycolin or their colleagues compared to how they would have been treated if they had not made the report. This legal protection applies during and after the internal or external reporting process.
3. If an investigation determines that the suspicion of misconduct cannot be confirmed, and the reporter has acted diligently, no measures will be taken against the reporter.
4. The reporter is still protected against retaliation under the EU Directive 2019/1937 on the protection of persons who report breaches of Union Law if it makes a public disclosure when:
 - a. The reporter first reported the breach with Union law internally and externally, or directly externally if deemed appropriate according to this policy, but no appropriate action as taken in feedback within the timeframes referred to in Chapter 7.
 - b. The reporter has reasonable grounds to believe that
 - a. The breach poses danger to the public interest, such as in case of an emergency situation or risk of irreversible damage; or
 - b. In the case of external reporting, there is a risk of retaliation or there is a low prospect of the breach being effectively addressed, due to the particular circumstances of the case, such as those where evidence may be concealed or destroyed or where an authority may be in collusion with the perpetrator of the misconduct or involved in the misconduct.
5. If it is found during the investigation that a report was made falsely or in bad faith¹, this may constitute grounds for taking proportional measures against the reporter. A report is made in 'bad faith' when the whistleblower does not have personal knowledge on a factual basis for the report, or when the whistleblower knew or reasonably should have known that the communication about the [suspected] misconduct is malicious, false or frivolous.
6. If the reporter is punished, treated unfairly, or otherwise unjustly disadvantaged by a particular person, there will be consequences for that individual.
7. Diligent action is considered to be the case if:
 - a. The reporter first raised the relevant facts internally, as described in Chapter 4 (Internal Reporting), unless this could not reasonably be expected according to this policy.
 - b. The reporter disclosed the facts to an external party.
 - c. The reporter had a reasonable suspicion, based on substantial grounds, that the relevant facts were accurate, as outlined in Chapter 2 (Definitions), Section 4, Subsection a.
 - d. The report to an external party involves a public interest, as described in Chapter 2 (Definitions), Section 4, Subsection b.
 - e. In the case of Chapter 8, Section 3, the societal importance of the report outweighs Blycolin's interest in confidentiality.
8. Reporter protection is not lost where the reporting person reported inaccurate information on misconduct by honest mistake.
9. Protection does not apply to persons who report information which is already fully available in the public domain or unsubstantiated rumours and hearsay.

11 Privacy

1. All personal data processed by Blycolin under this policy will be used solely to achieve the objectives of this policy. The data will only be shared with individuals who require it for these objectives, for legal compliance, or for a compelling public interest.
2. If a report is found to be unfounded, all related data will be destroyed as soon as possible unless the data is necessary to secure evidence for any potential legal proceedings.
3. If a report is substantiated, the data related to the investigation will be deleted within two months after the investigation concludes, unless disciplinary measures are taken or the data is necessary to secure evidence for potential legal proceedings.
4. If the Blycolin entity in question is part of a corporate group, data from a report will only be shared with other entities within the group if the report impacts these entities. If personal data must be processed outside the European Economic Area, Blycolin will take the necessary privacy measures to facilitate this.

12 Final Provisions

1. This policy came into effect on [insert date], 2025.
2. The Works Council Heerenveen granted approval for this policy on [insert date], 2025.
3. The policy is made available to all employees and non-employees working at Blycolin via the local HR departments and through the Internal Code of Conduct. The policy is made available to other stakeholders via the Blycolin website and through the External Code of Conduct.
4. This policy is intended as a Group guideline, Blycolin entities might deviate from this policy in its sole discretion, consistent with local laws.

Appendix 1: Contact details

Location	Internal contact	Phone number	Email address	External contact	Phone number	Email address
Blycolin Textile Services BV	A. de Bruijn	0031-0418-541800	a.debruijn@blycolin.com	Dhr. M.C. van Diemel	073-6456453	regio.middenzuid@arboned.nl
Blycolin Laundry de Blinde	Sandra Mellema	0513-644900 of (/403)	s.mellema@blycolin.com	Monique de Jong	06-10758531	msdejong@hotmail.nl
Blycolin Laundry Spijkenisse	Ilona Lammers	06-38342958	i.lammers@blycolin.com	<i>To be appointed</i>		
Blycolin Laundry Katwijk	Ilona Lammers	06-38342958	i.lammers@blycolin.com	<i>To be appointed</i>		
Blycolin Laundry Kolham	Ilona Lammers	06-38342958	i.lammers@blycolin.com	<i>To be appointed</i>		
Blycolin Laundry Renkum	Ilona Lammers	06-38342958	i.lammers@blycolin.com	<i>To be appointed</i>		
Blycolin Laundry Bunschoten	Ilona Lammers	06-38342958	i.lammers@blycolin.com	<i>To be appointed</i>		
Blycolin Laundry Den Haag						
Blycolin Laundry Leiden						
Blycolin Textile Services NV	Serge Cools	0032-03-488 68 18		Liantis	0032-014-849498	psy@liantis.be
Blycolin Laundry Mechelen	Nathalie Hodin	0032-0473-822010		Mensura	0032-02-5497100	
Blycolin Laundry Maasmechelen	Nathalie Hodin	0032-0473-822010		Mensura	0032-02-5497100	
Blycolin Textile Services GmbH						
Blycolin Textiel Support NV						
Blycolin Laundry Badmunder						
Blycolin Textile Services Sp. z o.o.						

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