

bunq

Whistleblowing Procedure

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Introduction

bunq was established to promote transparency and integrity in banking. Hence, if our employees have concerns about possible malpractices in bunq then they should be able to internally express these safely. For this purpose, we have drawn up a Whistleblowing Procedure. Here's the summary.

What is the scope of this procedure?

bunq Whistleblowing Procedure applies to all bunq employees, including individuals employed at bunq other than on the basis of an employment agreement.

It establishes a set of rules ensuring that all bunq employees are able to report possible malpractices and anonymity of employees is, as far as possible, guaranteed.

What to report?

Our Whistleblowing Procedure is designed to allow employees to report possible malpractice within bunq. Malpractice may refer to a reasonably founded suspicion or knowledge of an act or omission (or of an intended act or omission) within bunq that;

- constitutes a criminal offence (e.g., harassment);
- violates internal rules or regulations and/or legislation (e.g., unlawful use of bunq's IT infrastructure, serious breaches of the Data Processing Policy or prohibited private investment transaction);
- may have serious consequences for the business continuity of bunq (e.g., serious lacks in the IT security procedures);
- is intended to mislead authorities or persons responsible for implementing or supervising compliance with statutory regulations or legal investigators (e.g., covering up incidents, conflicts of interest or information security breaches); or
- can directly or indirectly damage the reputation of bunq in some way.

How to report?

Every bunq employee may report malpractice anonymously or not (and qualify as Whistleblower). Our Whistleblowing Procedure sets out the process to be followed for this purpose.

What do we do in case of a report?

When a bunq employee makes a report, we investigate and take necessary measures. We also give feedback to the reporting employee.

Protection of the Whistleblower

The whistleblower acting in good faith is not in any way disadvantaged as a consequence of reporting a malpractice. The whistleblower is protected from retaliation.