



WHISTLE-BLOWING POLICY NETBAL NEDERLAND

1.0 PURPOSE AND SCOPE

Netbal Nederland is committed to upholding the highest standards of good governance, integrity, transparency, and social safety across all organizational dimensions. This policy provides a secure, legally protected internal pathway and applies to board members, volunteers, member clubs, registered participants to report structural malpractice, illegal acts, or serious violations of NNL standards without fear of retaliation, marginalization, or disciplinary reprisal.

2.0 DEFINITION OF MALPRACTICE

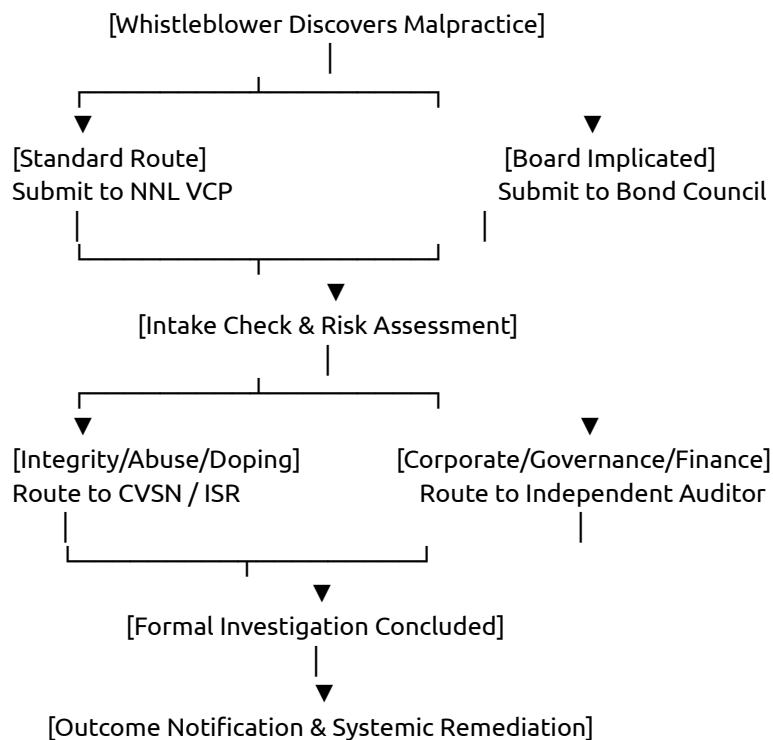
- 2.1 A whistle-blowing concern involves systemic, institutional, or hidden wrongdoings that impact the integrity or safety of the sport. It is distinct from a personal grievance .
- 2.2 Malpractice includes, but is not limited to:
- A. Financial fraud, embezzlement, corporate governance failures, or theft.
 - B. Systemic breaches of the Netbal Nederland Constitution, Netbal Nederland Statuten, or international regulations.
 - C. Severe cross-border behavioral violations, including sexual intimidation, harassment, match-fixing, or doping.
 - D. Intentionally concealing or covering up any of the above actions.

3.0 PROTECTION AND ANTI-RETALIATION

- 3.1 In strict compliance with the Dutch Whistleblowers Protection Act (*Wet bescherming klokkenluiders - Wbk*), NNL maintains zero tolerance for any form of unfair treatment, adverse career impact, harassment, or victimization of a whistleblower.
- 3.2 Any retaliatory action taken by a volunteer or elected official constitutes **gross misconduct** and may result in disciplinary action, removal from office or termination of membership, subject to due process.
- 3.3 Whistleblowers who submit a report in good faith based on reasonable belief are completely indemnified and legally protected throughout the entirety of the proceedings.
- 3.4 Submitting deliberate, malicious, or fabricated false allegations for personal gain is strictly prohibited and constitutes a severe disciplinary offense.



Step-by-Step Reporting & Intake Procedure



4.0 DESIGNATED INTAKE CHANNELS

- 4.1 To eliminate any conflict of interest, reports should be submitted through the designated reporting channels, never be routed to a shared board email address.
- 4.2 Reports must be filed via the following independent channels:

- A. **Standard Reporting Pathway:** Submitted directly to the designated NNL Independent Confidential Advisor (VCP)
- B. **Board Escalation Pathway:** If the malpractice concern involves, implicates, or blankets any member of the NNL Board of Directors, the report must be sent directly to the NNL Bond Council.

5.0 ANONYMOUS DISCLOSURES

In accordance with Dutch statutory law (*Wbk*), anonymous disclosures are fully accepted, tracked, and evaluated under this policy. While NNL encourages reporters to state their names to assist evidence collection, anonymous filings detailing verifiable objective evidence will be thoroughly processed.



6.0 CONFIDENTIALITY BOUNDARIES

- 6.1 The identity of the whistleblower will remain strictly confidential unless the reporter provides explicit written consent to dissolve anonymity, or if a statutory legal obligation under Dutch criminal law mandates disclosure.
- 6.2 If statutory exposure is legally unavoidable, NNL is required to notify the whistleblower in writing *before* their identity is revealed, and must deploy continuous protective safeguards against retaliation.

INVESTIGATION, JURISDICTIONS AND APPEALS

7.0 PROCESSING

- 7.1 Once a report is registered, an initial compliance screening must occur within seven (7) business days.
- 7.2 Whistleblowers hold no personal influence over how the investigation is managed.
- 7.3 The case will be directed exclusively through the appropriate legal channels:
 - A. **Severe Integrity, Safety, and Abuse Cases:** For all matters relating to cross-border behavior, sexual harassment, doping, or match-fixing, NNL will refer these matters to the **Instituut Sportrechtspraak (ISR)** and the **Centrum Veilige Sport Nederland (CVSN)**.
 - B. **Corporate Governance and Financial Malpractice:** Evaluated by an independent investigating officer appointed by the Bond Council, utilizing external auditors if required. Any implicated volunteer or official may be suspended as a provisional policy measure during the tracking phase.

8.0 TIMELINES AND DATA RETENTION

- 8.1 Reports will be acknowledged as soon as practicable. Acknowledgement of receipt will be given to the whistleblower within seven (7) days.
- 8.2 Reporters will receive updates during the process where appropriate and aligned with NOC*NSF regulations. The whistleblower shall receive substantive feedback regarding the process and outcome of the investigation within a reasonable timeframe, not exceeding three (3) months following the initial acknowledgement of receipt.
- 8.3 Personal data and investigative logs will be retained only as long as necessary and proportionate to fulfill legal procedures, and will be deleted or completely anonymized following case closure, save for financial data bound by statutory Dutch tax retention laws.



9.0 EXTERNAL ESCALATION FRAMEWORK

9.1 If an NNL member concludes that their concern was not handled objectively, or if they continue to face adverse treatment within their club framework, they hold an unrestrictable legal right to escalate the matter externally. The valid external entities are:

- A. **The Dutch Whistleblowers Authority (*Huis voor klokkenluiders*)** for corporate and employment infractions.
- B. **Centrum Veilige Sport Nederland (CVSN)** or the **ISR** for sports safety breaches.
- C. **The Dutch National Police (*Politie*)** for criminal offenses.

10.0 POLICY REVIEW

10.1 Any structural modifications or amendments to this policy require a formal review by the Board and a simple majority ratification vote by the **Bond Council** to maintain compliance integrity.

10.2 This policy comes into effect the day following approval by the Bond Council / Ledenraad.

11.0 DOCUMENT HISTORY

Version 01: Policy formation

Version 02: Rewrite conform NOC*NSF requirements

12.0 REFERENCES

- NNL Statuten
- NNL Constitution
- NOC*NSF Kwaliteiteneisen
- Wet bescherming klokkenluiders
- ISR
- VCSN

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Approved by Council: Approved	Votes: 8/8`	Date: 23/08/26