



TBVI INTEGRITY POLICY

Policy Statement

It is TBVI's policy to act with integrity and high ethical standards in all its business dealings, and to have a framework in place to guide employees and all who act on behalf of the Foundation to ensure these standards are upheld.

Purpose

The purpose of this Policy is to ensure that TBVI, its employees and those who act on behalf of TBVI do so in a manner that is consistent with TBVI's stated values.

Scope

This policy applies to all Directors and employees of TBVI and to all contractors who act for and on behalf of TBVI in its business dealings and relationships with the community at large

Policy outline

TBVI has established the integrity policy that is accessible for all employees at a central point. The aim is to embed and safeguard attention to integrity in the organisation. TBVI employees, and those who act on behalf of TBVI, have an obligation to conduct business consistent with TBVI's values. Integrity is an important part of the professional functioning of employees. This means, among other things, that actions and behavior must be in line with important standards and values of an organization.

The core values of TBVI include the following:

- Reliable
- Transparent
- Neutral (impartiality)
- Responsible
- Equality

Code of conduct

TBVI has a code of conduct for integrity for employees. The purpose is to provide employees with guidance when applying the standards and values of TBVI and makes clear the values and standards that TBVI considers important and what is and is not permissible for employees. The code of conduct is therefore also an instrument for calling employees to account for their actions and behaviour. The code of conduct applies to all employees.

All TBVI employees treat each other and collaborating partners with respect. Regardless of socio-economic, cultural and religious background, sexual orientation and gender.

High standards of ethical behaviour, 'we do what we say'. We behave with honesty and transparency, take responsibility and accountability, aim to trust and be trusted. We treat everybody with respect and in an ethical manner that does not harm any person working for, with or is in any way related to TBVI and its activities.

It is not acceptable for employees or those acting on behalf of TBVI to seek to obtain advantages for themselves, relatives or close friends, or other related parties, that are improper or in any way harm

TBVI's interests or reputation. Where actual or perceived conflicts of interest arise, these should be declared in accordance with the processes set out below.

Undesirable behavior

Undesirable behavior may include sexual intimidation, aggression, violence, intimidation and discrimination. Employees who are confronted with undesirable behavior can report this to a confidant from an external working conditions services.

Whistleblowing

TBVI assumes that people in the organisation work honestly and responsibly. It could, however, be the case that something is not going well. TBVI finds it important that attention is drawn to this.

Whistleblowing is where an employee (whistleblower) informs persons that could possibly take action against it of suspicions of illegal or immoral practices that take place under the responsibility of TBVI and for which a major societal interest is at stake.

The aim of the regulation is that every TBVI employee can, without obstruction, report a (suspicion of a) malpractice safely and effectively without this having consequences for his or her legal position.

TBVI assumes that work within the organisation is done in a responsible and honest manner. Integrity in actions and behaviour is an essential condition for TBVI to fulfil its statutory task. Integrity starts with sound behaviour of all employees. If something does not go right, TBVI finds it important that this can be reported.

Whistleblowing is the disclosure by an employee of (suspected) malpractice which takes place under the responsibility of TBVI and in which a major public interest is at stake. The aim of the regulation is that every TBVI employee can report (suspected) wrongdoing in a safe and effective manner without this having consequences for his legal position.

If you suspect wrongdoing, you can report this to your manager, the executive director and/or the Chair of the Governing Board but you can also turn to the outside counsel of TBVI, Groen Caubo Montessori in Almere.

The outside legal counsel informs TBVI's legal counsel and the Governing Board. This is followed by an investigation.

In addition to the possibility of internal reporting, whistleblowers will also have the possibility of directly using external channels for reporting, such as the European network (NEIWA).

<https://www.huisvoorklokkenluiders.nl/samenwerking/internationaal/europees-netwerk>

People other than employees will also be able to blow the whistle. This concerns people who perform work-related activities for TBVI such as trainees and temporary workers.

Conflicts of Interest

See the separate TBVI Conflicts of Interest Policy

Ancillary activities

Employees are obliged to report ancillary activities that relate to their job performance. The Executive Director for this purpose may or may not grant permission for the fulfilment thereof.

Bribery and Corruption

Improper payments, gifts or favours promised or offered may constitute bribery and corruption:

- If it is illegal;
- If it creates an obligation or perception of obligation on either party;
- If it cannot be transacted transparently;
- If it is unreasonable or excessive in terms of value or frequency;

- If the intention of the payment, gift or favour is to obtain undue personal or business advantage, or to encourage others to refrain from acting in the performance of their duties, or to willingly refrain from performing your own duties;
- If exposure is likely to cause embarrassment to the individual concerned or to TBVI.

In giving effect to this policy, we will not promise, offer, or accept improper payments to, through or from any person or organisation with whom we conduct business. We will not seek to influence other parties to offer or accept improper payments whether on our behalf or otherwise. This includes, but is not limited to, customers, agents, suppliers, contractors, joint venture partners, subsidiaries, labour unions, government or regulatory agents and officials, offer philanthropic donations, community investment or political contributions to try to obtain or retain undue personal or business advantage or to refrain or encourage others from performing their duties.

Gifts

The acceptance of gifts may sometimes give rise to apparent or potential conflicts of interest, as the receipt of gifts could be seen as a possible source of influence in the way a person conducts business on behalf of TBVI.

As a general rule, we should not accept any gift of significant value from outside interests in connection with the performance of TBVI. This includes gifts from vendors, suppliers, contractors, consultants, and other like organisations.

As a guide, gifts that may be in excess of Euro 100 in value should not be accepted. Where there are cultural or significant business reasons for accepting a gift of significant value you should inform the executive director and obtain the permission to accept the gift. Where such a gift is accepted it should be shared generally across TBVI or donated to a charity of TBVI's choosing. If acknowledgement is required, this should be given on behalf of TBVI and not the individual employee.

Letters of acknowledgement or thank you should be written on TBVI's letterhead and a copy should retain on a register of gifts accepted by employees.

Gifts include material items, services, accommodation, tickets to events and so forth.

If an employee believes there is an appropriate reason why an exception should be made regarding the acceptance of gifts, then they should make those reasons known to the executive director. This request for an exception should be made before any gift is accepted wherever possible.

Political Contributions

No person will make any financial or in kind contribution to a political party on behalf of TBVI. Any contributions or benefits extended to a political party will be authorised by the Governing Board.

Responsibility/Authority

It is the responsibility of the executive director to endorse, communicate and deploy this Policy, and for ensuring that all employees and contractors are aware of, understand, and comply with this policy.

If an employee does not comply with the policy, and persists in doing so, TBVI has a contract with an outside legal counsel (Groen, Caubo Montessorri, in Almere, Netherlands) to deal with the issue in an objective manner.

In all cases, the Chair of the Governing Board is available for people that wish to address any situation they may feel is not compliant with TBVI's integrity policy.

Implementation, safeguarding and evaluation of the policy

In order to ensure that employees are and remain aware of integrity, the subject 'Integrity' and the policy will recur regularly in internal meetings. These meetings offer also an opportunity to evaluate the policy and discuss possible changes and updates if needed.

Agreements and arrangements made about integrity must be complied with by all employees of TBVI. If an employee violates the agreements, regulations or otherwise does not work with integrity, this is considered a dereliction of duty.

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