



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 values as stated in this policy document.

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

The aim of TBVI's integrity policy 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 behaviour must be in line with important standards and values of an organization.

The core values of TBVI include the following:

- Equality
- Neutrality and impartiality
- Reliability
- Responsibility
- Transparency

This integrity policy is accessible for all employees at a central point.

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 to make 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.

This means 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.

Responsibility/Authority

It is the responsibility of the Executive Director to endorse, communicate and deploy this Policy, and to ensure 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 will hand the matter to its external legal counsel (Groen Caubo Montessori Advocaten in Almere, the Netherlands) to deal with the issue in an objective manner.

In all cases, the Chair of the Governing Board is available for those who 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 are regularly on the agenda in internal meetings. These meetings also offer an opportunity to evaluate the policy and discuss changes and updates if needed.

Agreements and arrangements concerning 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.

Ancillary activities

Employees are obliged to report ancillary activities that relate to their job performance. The Executive Director 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 they are illegal;
- If they create an obligation or perception of obligation on either party;
- If they cannot be transacted transparently;
- If they are 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 one's 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.

Conflicts of Interest

See the separate TBVI Conflicts of Interest Policy.

Gifts

The acceptance of gifts may 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. Gifts include material items, services, accommodation, tickets to events, and so forth.

As a general rule, TBVI related persons 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 one 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 of the individual employee.

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

If an employee believes there is an appropriate reason why an exception should be made regarding the acceptance of gifts, he or she should make those reasons known to the Executive Director. This request for an exception should be made before any gift is accepted.

Money laundering

Money laundering is the process of illegally concealing the origin of money obtained from illicit activities such as drug trafficking, corruption, embezzlement or gambling, by converting it into a legitimate source. It is a crime in many jurisdictions with varying definitions. It is usually a key operation of organized crime.

TBVI does not accept money laundering by any person employed by or associated with TBVI.

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 need to be authorised by the Governing Board.

Research integrity

To safeguard good scientific behaviour, all TBVI employees and all those who act on behalf of TBVI are bound to the principles of research integrity as laid down in the European Code of Conduct for Research Integrity (revised edition 2023).

Slavery and human trafficking

TBVI has a zero tolerance policy with regard to modern slavery and human trafficking, and is committed to monitoring, developing and improving our operations to combat slavery and human trafficking.

We seek to ensure there is no modern slavery, human trafficking or other abuse of human rights in our business operations or in the operations of any of our partners.

TBVI has an internal and external whistleblowing system in place. This includes protection for whistleblowers. Implications in terms of modern slavery can be brought via this system.

Undesirable behaviour

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

Whistleblowing

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 or her legal position.

Suspicious of wrongdoing can be reported to the employee's manager, the Executive Director and/or the Chair of the Governing Board. Alternatively, they can be reported to TBVI's external counsel, Groen Caubo Montessori Advocaten in Almere, the Netherlands. The external 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 also have the possibility of directly using external channels for reporting, such as the European network (NEIWA) or the Dutch site <https://www.huisvoorklokkenuiders.nl/samenwerking/internationaal/europees-netwerk>

Others than employees can also blow the whistle, e.g., people who perform work-related activities for TBVI such as trainees and temporary workers.