

THE AOG - PART 10

CODE OF ETHICAL BEHAVIOUR



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1 Introduction

Wittenborg aims to be a good employer, i.e. an employer that behaves ethically towards its staff, respects its staff members' rights, ensures good and safe working conditions and environments. At the same time, Wittenborg expects its staff members to uphold high ethical standards in line with its values of internationalisation, diversity and ethics. Formulating a Code of Ethical Behaviour that serves as a guideline for its staff is part of this effort.

The Wittenborg Code of Ethical Behaviour is applicable to all persons engaged with Wittenborg or its programmes, regardless of employment status or position. Our Code of Ethical Behaviour is guided by our key values of ethics, diversity and internationalisation and aimed at creating a positive working and learning environment in which everyone is treated with respect, dignity and fairness.

Wittenborg expects its staff members to behave ethically both during working hours, as well as, to an extent, part of their private (digital) lives, when the harmful private behaviour by employees reflects negatively on Wittenborg, its staff and its students.

While holding all staff members to the same standards, Wittenborg places special responsibility on its management team members to lead by example and continuously set, uphold and improve high ethical standards, ensuring integrity, accountability and fairness in all business practices.

Moreover, Wittenborg expects third parties, such as suppliers to behave in an ethical manner in line with the Wittenborg Code of Ethical Behaviour. When interacting with Wittenborg staff members, third parties will be held to the same standards and any unacceptable behaviour may result in reporting of misconduct, as well as potentially ending the cooperation with the third party.

Wittenborg aims to make its Code of Ethical Behaviour more relatable and actionable by providing working instructions and best practices, for example in the form of FAQ in Staff Resources, and as part of orientation and training.

2 Our Values

Ethics, diversity, internationalisation are the key values of Wittenborg. Wittenborg is committed to positive working and a learning environment in which everyone feels safe and is treated fairly, with respect and dignity. Guided by our motto “Better Yourself – Better Our World”, all staff members are expected to maintain and promote an inclusive and ethical working environment, free of discrimination, harassment, intimidation, violence, and corruption, and as such to uphold the Wittenborg key values.

Wittenborg is committed to maintaining the highest ethical standards and expects all staff members to uphold these principles. Any behaviour detrimental to our values and the wellbeing of colleagues and or students is not acceptable and can be subject to disciplinary action, including termination of your engagement at Wittenborg.

3 Integrity and Ethical Conduct

3.1 Conflicts of Interest

A conflict of interest is present when a staff member's direct or indirect (the latter generally related to, among others, their family and/or friends) personal interests are in conflict with, or negatively affect their work at Wittenborg, or in other ways have an adverse effect or reflection on Wittenborg.

A staff member's personal interest, both direct and indirect, can be financial or non-financial. Examples of the latter are career enhancements, personal or professional reputations, access to information and the promoting of certain staff members over others for personal reasons.

Staff members should avoid situations where their personal interests could conflict with Wittenborg's interests. Any potential conflicts of interest must be disclosed immediately, and staff members should actively recuse themselves from decisions where a potential conflict of interest exists.

Since conflicts of interest can be actual, potential, or perceived, it is important to recognise and evaluate possible actual, potential or perceived conflicts of interest and act to resolve them.. Notably, as part of our ethical standards, staff members should try to avoid even perceived or potential conflicts of interest.

If you suspect a conflict of interest or are uncertain whether an activity constitutes a conflict of interest, you are expected to discuss this with your supervisor, or the HRM Department, who will then advise you accordingly and take the required steps.

3.2 Personal Gain

Wittenborg staff members may encounter moments in which they (or people the staff member has close relationships with, in which case the following also applies) are offered gifts by internal or external business acquaintances, or students, both tangible and intangible. The basic policy regarding these situations is that Wittenborg staff members should not accept such gifts, with the following exception: occasional small gifts (worth € 25 or less) as tokens of appreciation may be accepted. This exception does not apply in negotiation situations in which the gift giver still has something to gain (such as an order or a mark).

Regarding networking invitations, staff members are allowed to accept them, provided they do not have the potential to compromise their independence.

Wittenborg maintains a strict policy prohibiting staff members from participating in activities related to services, whether for students or the school itself, outside the confines of their official employment or contractual obligations. The institution upholds a commitment to ethical conduct towards its students, staff, and organisational data at all times. This commitment includes a prohibition against the use of internal data for personal gain. All staff members are bound by a confidentiality agreement to uphold these standards.

Furthermore, staff members, whether employed or under contract with Wittenborg, as well as their immediate family members, are expressly forbidden from engaging in student recruitment activities outside

their designated professional roles. It is also strictly prohibited for them to solicit or accept payment from students or Wittenborg for recruitment services.

3.3 Ancillary and Conflicting Activities

Ancillary activities refer to staff members' work and activities (including the holding of shares) carried out outside their position at Wittenborg, regardless of the scope or compensation levels of such activities or the scope of the staff member's contract with Wittenborg.

Ancillary activities can be beneficial to Wittenborg, especially when they add value to society, academic knowledge, professional experience, and the well-being of staff members. For this reason, Wittenborg encourages a variety of ancillary activities. However, to avoid conflicts of interest, it is important for Wittenborg to be aware of and approve of staff members' ancillary activities. Staff members are thus obligated to report them.

Reporting is not required if the ancillary activities evidently have no connection to a staff member's work at Wittenborg, cannot harm the interest of the institute, do not threaten the staff member's performance, are not performed within working hours and do not include compensation of any kind.

3.4 Procurement

Staff members whose positions require procurement should avoid both actual and perceived corruption and bribery. The offering or awarding of special favours to potential suppliers is not permitted. Staff members in contact with suppliers should not use their services for private use, unless this was explicitly permitted by the Wittenborg Executive Board.

3.5 Financial Interest in Organisations

In general, financial interests in other organisations fall under ancillary activities. Having a financial interest in any other organisation that can lead to a conflict of interest should be avoided. This also applies to indirect financial interests (e.g. when a staff member's partner owns a company that does business with Wittenborg).

If you are uncertain if this applies to your situation, you should consult your supervisors or the HRM department.

3.6 Research Integrity and Ethics

Wittenborg has formally adopted the Netherlands Code of Conduct for Research Integrity (AOG-Part 8A).

4 Unacceptable Behaviour

Any type of unwanted and offensive conduct that affects the dignity and wellbeing of others is unacceptable behaviour. This includes but is not limited to any form of:

- (Sexual) intimidation
- (Sexual) harassment
- Violence and aggression
- Threats
- Bullying
- Isolation or exclusion of others
- Discrimination
- Abuse of power

These types of unacceptable behaviour can be physical, but also verbal or written. Unacceptable behaviour can be displayed by colleagues, supervisors, and managers, but also by suppliers, customers and third parties.

Wittenborg stands firmly against any type of unacceptable behaviour. Within Wittenborg it is our collective responsibility to be mindful of the types of unacceptable behaviour that can exist and support each other in maintaining an environment that is free of such behaviour. We encourage all our staff members to stand up against any form of unacceptable behaviour and to aid and support colleagues who fall victim to it.

Complaints or observations of unacceptable behaviour will always be taken seriously. Any type of retaliation against a person who brings forward a complaint or aids in the investigation of a complaint is prohibited.

Displaying unacceptable behaviour can lead to disciplinary actions, including termination.

4.1 Bullying

Bullying exists when there is ongoing and deliberate abuse of (perceived) power by an individual or group in the form of repeated behaviour intended to cause someone physical or psychological harm. Bullying can be verbal, physical or social. When someone is structurally made fun of in the workplace, what starts as teasing becomes bullying and can lead to serious health problems for the victim.

Examples of bullying at work include but are not limited to:

- Making someone perform meaningless tasks
- Intentionally given someone a wrong appraisal
- Ignoring, isolating and excluding someone
- Imitating someone
- Making jokes at the expense of someone
- Shouting, cursing, intimidation and physical aggression
- Gossip

4.2 Violence and Aggression

Aggression and violence occur when an employee is verbally or physically harassed, threatened or attacked. Violence and aggression can take several forms that include but are not limited to:

- Verbal aggression: swearing, yelling or arguing fiercely, as well as discriminatory comments
- Physical aggression: kicking, pushing, hitting, spitting, vandalising or robbing, as well as more extreme forms of violence in the case of assaults or attacks
- Psychological aggression: threatening, blackmailing or humiliating someone verbally or in writing

4.3 Discrimination

Discrimination occurs when an unfair difference is made in the treatment of people. Discrimination exists in when a difference is made based on characteristics of no consequence. There are various grounds of discrimination specified under Dutch law. Those are:

- Race
- Gender
- Pregnancy, birth and motherhood
- Sexual orientation
- Political opinion
- Religion
- Belief
- Disability or chronic illness
- Civil status
- Age
- Nationality
- Working hours (full-time or part-time)
- Type of employment contract (temporary or permanent)

Discrimination at work can take place at various times. For example, during a job application, during possible promotions, during dismissal rounds, when determining remuneration/salary, or during the work itself.

4.4 Sexual Harassment

Sexual harassment at work is any form of sexual advance, requests for sexual favours or other sexually oriented behaviour (verbal, non-verbal or physical) in the work environment that is perceived as inappropriate or unacceptable.

Sexual harassment can manifest itself in (a combination of) three forms:

- Verbal (intimidation): sexually suggestive comments, jokes, asking intimate questions or innuendo, etc.

- Non-verbal: staring, sexually oriented gestures or facial expressions, showing sexually tinted or pornographic images (including via email, WhatsApp, Teams, etc.)
- Physical: all forms of inappropriate or unacceptable physical contact, such as an arm around the shoulder, groping, squeezing, kissing, blocking the way, invading personal space and getting into someone's comfort zone, assault or even rape, etc.

Sometimes, sexual harassment can be difficult to spot, as it can be both intentional and unintentional. It is important to understand that sexual harassment is not about the intention of the perpetrator, but about how the recipient experiences it: what is innocent for one person, can be experienced as annoying, undesirable or intimidating by another. Everyone determines for themselves where the boundary lies between desirable and undesirable behaviour and that needs to be respected by others.

5 Other Standards and Rules

5.1 Confidentiality and Confidential Information

Staff members are bound to keep in confidence all information about Wittenborg that Wittenborg has classified as confidential, as well as all information of which the staff members can be expected to identify its confidential nature. This includes but is not limited to proprietary information, trade secrets, or any other confidential information that could harm Wittenborg or its stakeholders if revealed

Staff members should at all times prevent unauthorised parties from gaining access to said information. In practice, this, among other things, means that staff members are expected to protect their data carriers, accounts, computers, etc. When logged in with their accounts, staff members should not leave their computer unattended.

Staff members should furthermore only use information for its intended purpose.

Staff member's obligation to maintain confidentiality may not affect the observance of academic freedom by academic staff members as referred to in Section 1.6 of the [Higher Education and Research Act](#).

5.2 Privacy-Sensitive Data and Data Breaches

Wittenborg respects staff members' rights to have their personal data protected and treated with care and respect. Rules related to privacy-sensitive data are laid down in the [General Data Processing Regulation](#) (or GDPR) and in the AOG-Part 14.

Staff members should only use personal data for its intended purposes and should, principally, not supply said data to third parties.

A data breach refers to the loss of personal data, or if the loss or unlawful processing of personal data cannot be ruled out to a reasonable extent. Data breaches can be the result of criminal conduct, such as hacking, but also due to accidents, such as the incorrect submission of files or the loss of USB drives.

5.3 Use of Wittenborg Buildings and Grounds

Wittenborg expects all its staff members to be ethical and respectful in their use of company property.

Staff members must make use of Wittenborg buildings and grounds according to their intended purpose and must adhere to instructions provided by or in the name of management. In general, behaviour should not cause harm, damage, or inconvenience, or infringe on the rights of, Wittenborg, its students and staff, or third parties also making use of the buildings or grounds.

It is not allowed to bring any unauthorised person onto Wittenborg company property without prior agreement from management, unless staff members are authorised to do so as part of their job. In these circumstances staff members are responsible for ensuring that their visitors are appropriately monitored

during their stay, that they act according to the guidelines provided in this section, and that they do not access areas or company property inappropriately.

5.4 Use of Resources and Facilities

Wittenborg expects all its staff members to be ethical and respectful in their use of company resources and facilities.

Wittenborg staff members are given access to resources such as computers, office supplies, e-mail accounts and telephones. They are expected to treat all resources with care and for its intended purpose. In principle, those resources are not meant for private use.

Reasonable private use of company resources is allowed, although not encouraged. Similarly, staff members may make reasonable use of private resources for company purposes. If in doubt in either situation, staff members should discuss it with their supervisor. This also applies to internet usage. Crucially, in case of the latter, usage such as illegal downloading of media and software, the viewing, downloading, or distributing of harmful (pornographic, discriminatory, abusive, etc.) content and the sending of harmful messages is prohibited. Staff members should report such illicit usage by others to their supervisors or the HRM department.

It is not allowed to remove company property from Wittenborg premises unless explicit permission has been given by a supervisor.

5.5 Drugs, Alcohol, Weapons and Gambling

The following behaviour and actions (non-exhaustive) are also classified as unacceptable behaviour at work and on Wittenborg premises and as such can lead to disciplinary actions:

- Abuse of prescription and over-the-counter drugs
- Use, possession, or distribution of narcotics or other controlled substances, except as expressly permitted by law
- Use, possession, or distribution of alcoholic beverages, except as expressly permitted by the law and Wittenborg policies, or public intoxication
- Use or possession of drug-related paraphernalia
- Use or possession of firearms, fireworks, other explosives, other weapons, or dangerous chemicals on Wittenborg premises not specifically authorized by Wittenborg
- Misuse of legal objects in a dangerous manner (e.g. laser pointing in someone's eyes)
- Illegal gambling or wagering

In addition, please refer to our non-smoking policy outlined in the General Staff Handbook (AOG-Part 3).

5.6 Illegal Activity

Staff members are expected to comply with all applicable laws, regulations, and company policies. They should stay informed about relevant legal and regulatory changes affecting their work and ensure that their

actions are in full compliance. Any type of illegal activity, such as but not exclusive to fraud, violent crimes, bribery, racism and hate crimes, etc., within as well as outside of the context of working at Wittenborg, prohibited by law, even if not explicitly mentioned by this code of conduct, is seen as unacceptable behaviour at Wittenborg. When necessary, Wittenborg will report illegal activity by staff members to law enforcement authorities.

5.7 Emotional Relationships in the Workplace

Romantic or intimate relationships between Wittenborg co-workers are acceptable under the condition that Wittenborg is notified of the existence of the relationship. If the relationship exists between a direct supervisor and a team member, Wittenborg may take action to adjust reporting lines to ensure fair appraisals, evaluations, and to avoid conflicts of interest.

As an institute of higher education, Wittenborg is inherently aware and mindful of the power relationships that exist between faculty and students. To ensure fairness, integrity, and the avoidance of conflicts of interest, romantic or intimate relationships between Wittenborg staff members and active Wittenborg students are prohibited where a direct or indirect power relationship exists (e.g., teaching, assessment, supervision, counselling, or decision-making authority). Where no such power relationship exists, staff members must still disclose the relationship to HR to ensure transparency and safeguard professional boundaries.

All romantic or intimate relationships involving Wittenborg staff members—whether with other staff or with students—must be disclosed to HR. Failure to disclose a relationship or entering into a prohibited relationship may result in appropriate measures being taken by Wittenborg. These may include reassignment of duties, formal warnings, or, in serious cases where professional integrity is compromised, termination of employment.

5.8 Environmental Consciousness

Wittenborg is committed to sustainability and accepts its responsibility to pursue practices and operate in such a way as to enhance the quality of the local, national and global environment. This is done not only by making sustainability a key part of its programmes, but also through implementing recycling schemes, building connections with environmental agencies, and considering sustainability in its facilities, locations and accommodations.

Wittenborg expects staff members to:

- Reduce the amount of resources used, particularly energy and paper.
- Separate their waste for recycling and use the appropriate recycling containers.
- Travel as much as possible using public transport.

5.8.1 Sustainable Investing

The purpose is to ensure that Wittenborg University of Applied Sciences aligns its investment practices with its commitment to sustainability, ethical responsibility, and environmental stewardship. This applies to all

investment decisions, made by the institution, including but not limited to endowment of funds, reserve funds, and any other financial assets managed by the institution.

Principles

- **Ethical Considerations:** Investments will be made in companies and funds that adhere to high ethical standards, including respect for human rights, fair labour practices, and anti-corruption measures.
- **Environmental Responsibility:** Preference will be given to investments that demonstrate a commitment to reducing environmental impact, promoting renewable energy, and supporting sustainable resource management.
- **Social Impact:** Investments should contribute positively to society, supporting initiatives and organisations that foster community development, education, and social equity.
- **Governance:** Investments will be made in companies with strong governance structures, transparency, and accountability.

Implementation

- **Investment Selection:** The institution will use Environmental, Social, and Governance (ESG) criteria to guide investment decisions. External advisors with expertise in sustainable investing may be consulted.
- **Monitoring:** The institution will regularly review its investment portfolio to ensure compliance with this policy.
- **Stakeholder Engagement:** The institution will engage with stakeholders, including students, staff, and the wider community, to gather input on sustainable investing practices.

5.8.2 Sustainable Funding and Donations

The purpose is to guide the acceptance and management of funds and donations in a manner that aligns with Wittenborg values and sustainability goals. This applies to all monetary and in-kind donations, grants, and other forms of financial support received by the institution.

Principles

- **Alignment with Values:** Donations and funding must align with the institution's commitment to sustainability, academic integrity, and social responsibility.
- **Transparency:** All funding sources will be disclosed and evaluated to ensure they do not conflict with the Wittenborg's mission and values.
- **Ethical Standards:** The institution will not accept funds from sources that engage in practices harmful to the environment, society, or that violate ethical standards.

Implementation

- **Due Diligence:** A thorough vetting process will be conducted for all potential donors and funding sources to ensure alignment with the institution's values and sustainability commitments.
- **Reporting:** Wittenborg will maintain transparency by publicly reporting all accepted donations and funding, including their sources and intended use.

5.8.3 Sustainable Procurement and Purchasing

The purpose is to ensure that all goods and services acquired by Wittenborg University of Applied Sciences are sourced in a manner that is environmentally sustainable, socially responsible, and economically viable. This applies to all procurement and purchasing activities conducted by the institution, including those carried out by departments, faculties, and affiliated organisations.

Principles

- **Environmental Impact:** Preference will be given to products and services that have a reduced environmental footprint, such as those that are energy-efficient, recyclable, or made from sustainable materials.
- **Social Responsibility:** Wittenborg will prioritize suppliers that demonstrate fair labour practices, respect for human rights, and contributions to community development.
- **Economic Viability:** Sustainable procurement will be balanced with economic considerations to ensure value for money and the responsible use of Wittenborg funds.
- **Lifecycle Consideration:** The entire lifecycle of products, from production to disposal, will be considered to minimize negative environmental and social impacts.

Implementation

- **Supplier Assessment:** Suppliers will be evaluated based on their sustainability practices and adherence to ethical standards. This evaluation will be part of the procurement process.
- **Sustainable Criteria:** Procurement guidelines will include specific criteria for sustainability that must be met or exceeded in procurement decisions.
- **Training and Awareness:** Staff involved in procurement will receive training on sustainable procurement practices and the importance of sustainability in purchasing decisions.
- **Monitoring:** The institution will track and report on the sustainability performance of its procurement activities. Regular audits will be conducted to ensure compliance with this policy.

6 Ethical Leadership

Wittenborg recognises that its managers play a critical role in shaping and maintaining the ethical standards and professional culture of the institution. As such, Wittenborg places special responsibility on its management team members to lead by example and continuously set, uphold and improve high ethical standards, contributing to a culture of integrity, respect, and accountability.

We thus expect managers to follow the following key principles of ethical leadership, ensuring that they lead by example and uphold Wittenborg's values.

6.1 Integrity and Transparency

Managers are expected to act with integrity and honesty in all interactions, both within the school and with external stakeholders. Transparency in decision-making, communication, and processes is critical to building trust and fostering an ethical environment. They should provide accurate information, avoid conflicts of interest, and uphold the trust placed in them by Wittenborg, its staff members and students.

6.2 Accountability and Responsibility

Managers are responsible for their actions and decisions and must hold themselves accountable to the highest ethical standards. They are also responsible for ensuring that their teams operate within these same standards and must address any unethical behaviour promptly and fairly.

6.3 Fairness and Respect

All managers should demonstrate fairness in their decision-making processes, ensuring that they treat all staff members, students, and stakeholders with respect and without discrimination. Fairness also means providing equal opportunities for all employees and acting impartially in conflicts or grievances. Special attention should be given to aspects of diversity and inclusion (AOG-Part 11).

6.4 Ethical Decision-Making

Managers are expected to consider the ethical implications of their decisions and to use ethical frameworks in their leadership practices. When faced with dilemmas, they should seek advice and consider the long-term impact on the Wittenborg community and stakeholders.

6.5 Role Model Behaviour

Managers should lead by example by upholding Wittenborg's values and code of ethical behaviour in their own behaviour. This includes functioning as a positive example, fostering an environment of openness, encouraging ethical behaviour in others, and addressing unethical practices in a constructive and timely manner. Management team members should engage in continuous learning to improve their ethical awareness and decision-making skills, as well as continuously honing their knowledge on best practices in ethics and compliance.

6.6 Safeguarding and Professional Conduct

Managers have a duty to protect the well-being of students, staff, and other stakeholders. This includes creating a safe, inclusive, and professional working environment, as well as ensuring compliance with all relevant laws, regulations, and institutional policies. We see it as the duty of our managers to report any unethical behaviour or violations of our code of ethical behaviour, as well as to ensure that any concerns by staff members can be reported through the appropriate channels without fear of retaliation, and to ensure that all reports are taken seriously and are investigated thoroughly.

7 Facilities to Promote Ethical Behaviour

Wittenborg regards it as imperative that staff members feel safe at work and can work in a pleasant and collegial environment, being treated with respect and dignity. We actively promote ethical behaviour by encouraging each and every one of our staff members to uphold our core value of ethics, leading by example, pointing out ways to improve and standing up for others.

7.1 Confidential Adviser on Unacceptable Behaviour

Wittenborg has appointed a confidential adviser on unacceptable behaviour, such as sexual intimidation, harassment, discrimination, bullying, or aggression and violence (explained above). The confidential adviser can function as the first point of contact for staff members who experience or have experienced unacceptable behaviour from other members of the organisation. Staff members can discuss the problem that they face with the confidential adviser under strict confidentiality. The confidential adviser offers advice and only involves or informs third parties with the explicit permission of the staff member who has sought advice. The confidential adviser offers support, and can inform the victim of possible ways to resolve the problem, report the problem and file a complaint.

7.2 Unacceptable Behaviour Reporting Structure

If you are the victim of any type of unacceptable behaviour, we strongly encourage you to speak with either your supervisor, the HRM Department, or the designated confidential adviser at Wittenborg. If you are able to do so, please try to provide a written record of the incidents, including the date, time, place and circumstances.

There are two levels of reporting incidents and making complaints at Wittenborg.

In the first instance, we follow an informal reporting structure to try to avoid further escalation and re-build the relationship between the parties concerned if possible and applicable. The informal reporting procedure includes:

- Wittenborg employees can raise incidents of unacceptable behaviour to their supervisor, the HRM department, and/or the confidential adviser within Wittenborg. We intentionally offer various contact persons to informally raise incidents, so that there are numerous points of contact available to victims and/or observers depending on individual circumstances.
- Depending on the situation, the supervisor, HRM (or the confidential adviser) can choose to:
 - Take action and confront the person reported of unacceptable behaviour.
 - Opt to make use of mediation.
 - Refer the victim or observer to the confidential advisor.

If the informal procedure does not lead to a desired result or if the unacceptable behavior is of a nature that is too serious for the informal procedure, a formal complaint procedure may be necessary to understand whether the complaint is justified or not. This requires a careful investigation into the accounts of both parties. Wittenborg has a formal complaint procedure that should be followed in this case (AOG-Part 16).

If you observe any type of unacceptable behaviour towards others, we strongly encourage you to offer your support to the victim and/or to report the incident.

Be sure not to put yourself or others in danger. If someone is in immediate danger or there is an imminent threat, notify security or the appropriate authorities.

Wittenborg has aftercare procedures for victims of unacceptable behaviour. Those are outlined in our Health and Safety Policy (AOG-Part 12).

Complaints or observations of unacceptable behaviour will always be taken seriously. Any type of retaliation against a person who brings forward a complaint or aids in the investigation of a complaint is prohibited.

7.3 Reporting General Misconduct

Similarly to the reporting structure for reporting unacceptable behaviour, we strongly encourage you to speak with either your supervisor or the HRM Department if you witness misconduct, other than unacceptable behaviour, for which the separate procedure outlined above applies. If you are able to do so, please try to provide a written record of the incidents, including the date, time, place and circumstances.

In general, there are two levels of reporting incidents of misconduct and making complaints at Wittenborg.

In the first instance, we follow an informal reporting structure to try to avoid further escalation, and allow for clarification. The informal reporting procedure includes:

- Wittenborg employees can raise incidents of misconduct to their supervisor or the HRM department. We intentionally offer various contact persons to informally raise incidents, so that there are numerous points of contact available to observers and/or victims depending on the type of misconduct and individual circumstances.
- Depending on the situation, the supervisor, or HRM, can choose to:
 - Confront the person reported of misconduct, and have a conversation about the accusations and try to solve the concerns in a mutually agreeable manner.
 - Opt to make use of mediation to involve an objective third party.
 - Make a formal complaint and proceed with appropriate proceedings outlined in the Complaints Procedure (AOG-Part 16), thus starting the formal complaint procedure.

If the informal procedure does not lead to a desired result or if the behaviour is of a nature that is too serious for the informal procedure, a formal complaint procedure may be necessary to understand whether the complaint is justified or not. This requires a careful investigation into the accounts of all parties involved. Wittenborg has a formal complaint procedure that should be followed in this case (AOG-Part 16).

Complaints or observations of misconduct will always be taken seriously. Any type of retaliation against a person who brings forward a complaint or aids in the investigation of a complaint is prohibited.

7.4 *Disciplinary Measures*

An essential component of promoting ethical behaviour and enforcing our policy on ethical behaviour is answering non-compliance with disciplinary measures. Non-compliance with this code of conduct can, therefore, lead to the following disciplinary actions (non-exhaustive):

- Verbal warning
- Letter of warning
- Write up: note in the personal file of the employee
- Action plan to improve behaviour
- Suspension
- Termination

Appropriate disciplinary actions are dependent on the type and severity of the misconduct. Disciplinary actions are decided in a fair and objective procedures, allowing all parties involved to voice their perspective.