

THE AOG - PART 12

HEALTH AND SAFETY POLICY



31 August 2025

CONTENTS

1	Introduction	4
2	Risk Inventory and Evaluation	6
3	Occupational Health and Safety Service	7
3.1	Occupational Health Expert	7
3.2	Company Doctor	8
3.3	PMO	8
4	Company Emergency Response	10
5	Prevention Officer	11
6	Work and Rest Periods	12
6.1	Right to Disconnect	12
6.2	Overtime and Extra Hours	12
6.3	Legal Compliance	13
6.3.1	Legal Rest Periods	13
6.3.2	Legal Breaks	13
6.3.3	Maximum Legal Working Hours	13
6.3.4	Working on Sundays	13
6.4	Tips	13
7	Psychosocial Workplace Hazards (PSA)	14
7.1	Facilities to Prevent Work Pressure	14
7.1.1	Open-Door Policy and Transparency	15
7.1.2	Annual Development Talks	15
7.1.3	Key Role of Managers	15
7.1.4	Leave Policy	16
7.1.5	Wittenborg Family	16
7.1.6	Tips	16
7.2	Facilities to Prevent Unacceptable Behaviour	17
7.2.1	Code of Ethical Behaviour	17
7.2.2	Confidential Adviser for Unacceptable Behaviour	17
7.2.3	Information and Instructions	18

7.2.4	Training for Managers	18
7.2.5	Victim Aftercare.....	18
8	Physical Strain	20
8.1	Facilities to Prevent Physical Strain	20
8.1.1	Ergonomic Workspace.....	20
8.1.2	Additional Equipment.....	20
8.1.3	Breaks and Exercise	20
9	Working from Home.....	21
10	Special Regulations	22
10.1	Pregnant Staff Members and New Mothers.....	22
10.2	Breastfeeding.....	22
10.3	Additional Rights during Pregnancy and 6 Months after Giving Birth.....	22
10.4	Underage Staff Members.....	23
10.5	Working for Other Employers Besides Wittenborg	25

1 Introduction

Wittenborg places great value on the health, safety and well-being of its staff members and is keen on safeguarding those for the long term. We are committed to providing a work environment in which people can work in a healthy, pleasant and productive manner, free from harm.

Our Health and Safety Policy is inextricably linked to our Diversity and Inclusion Policy (AOG-Part 11) and our Code of Ethical Behaviour (AOG-Part 10). Furthermore, regulations that result from this policy on health and safety inform our regulations and guidelines, brought forward and made actionable in our staff handbooks (AOG-Part 3-5).

The basis of ensuring health and safety at work rests on Wittenborg being “a good employer” and employees being “good employees”. Both Wittenborg, as well as the employees have rights, obligations and responsibilities when it comes to health and safety.

As the employer, Wittenborg is responsible for ensuring a healthy and safe work environment for employees. An assessment of the risks associated with working at Wittenborg and a plan of action on how to prevent and cope with those risks are part of the legally required “Risk Inventory and Evaluation (RI&E)” that forms the basis of our Health and Safety Policy. As such, our Health and Safety Policy is subject to a cycle of PDCA and undergoes yearly evaluation and adjustment.

Our policy is designed to comply with the [Dutch Working Conditions Legislation](#) (*Arbeidsomstandighedenwet*). Wittenborg staff representatives have a voice regarding our Health and Safety Policy, being able to participate and influence the RI&E, the agreement with the occupational health and safety service provider. It was agreed that Wittenborg’s prevention officer is always the HR Manager, by default.

In the Netherlands, the employer and the employees are mutually responsible for implementing and ensuring health and safety at work.

The most important obligations of employees are:

- Complying with the instructions provided by Wittenborg and the agreements made with Wittenborg.
- Using the right equipment in the right manner.
- Giving Wittenborg the possibility to check and evaluate the above.
- Notifying Wittenborg of potential threats to health and safety as soon as possible, and if needed repeatedly.

The most important obligations of Wittenborg as an employer are to:

- Develop and executive policy on labour conditions.
- Asses and list risks of employees and measurements taken in the RI&E.
- Appoint a prevention officer.
- Have a basic agreement with an Occupational Health and Safety Service (Arbodienst).
- Ensure ergonomic workspaces for employees.

- Ensure that employees comply with the rules concerning work and work times.
- Inform employees about safe working conditions and help them to work safely.
- Try to prevent psychosocial strain.

While principles related to health and safety, as well as rules of conduct, apply to all staff members of Wittenborg, some of the facilities available to promote and safeguard health and safety at work, as well as to support through sickness and reintegration are only available and applicable to staff members with an employment contract at Wittenborg. If you are in doubt as to whether or not a certain provision applies to you, please feel free to contact the HRM department for further information and guidance.

Tools, information and instructions related to 'Health and Safety' are available under Staff Resources.

2 Risk Inventory and Evaluation

The risk inventory and evaluation (RI&E) outlines the risks involved in work at Wittenborg for the health and safety of its employees. Wittenborg creates its RI&E together with Perspectief and this is updated on a regular basis. Whenever new situations occur within Wittenborg, or working methods or equipment change, the RI&E has to be adjusted to reflect those changes and translate them into actions safeguarding health and safety.

In the context of Wittenborg, the RI&E generally covers the topics of:

- Physical strain and stress
- Computer work
- Noise
- Work equipment
- Psychosocial workplace hazards (*Psychosociale arbeidsbelasting, PSA*), such as work pressure, intimidation and aggression.

Additionally, special attention is paid to special categories of staff members, such as pregnant employees, underage staff members, or those involved in reintegration to work.

Based on the identified risks in the RI&E, a plan of action is developed detailing the measures taken to further reduce or eliminate the risks identified.

3 Occupational Health and Safety Service

As an employer in the Netherlands, Wittenborg is obliged to have a qualified occupational health and safety service. For this purpose, Wittenborg contracts [Perspectief](#).

Perspectief supports Wittenborg with the following:

- Employee sickness and reducing absenteeism
- Medical examinations
- Access to a company doctor
- Access to an occupational health expert
- Risk assessment and evaluation (RI&E)
- Voluntary periodical medical examinations (PMO)

The service is staffed by professional occupational health physicians and consultants.

Perspectief provides independent advice and support to HRM, employees and their direct managers on employee well-being and health matters. Please note that Perspectief and the service provided is only available to those staff members working for Wittenborg as part of an employment contract.

All consultations are carried out in strict medical confidence and no medical details or diagnosis is shared with Wittenborg.

Normally, consultations are instigated by HRM based on concerns related to employee health or well-being, or due to sickness. However, as an employee, you also have the possibility to directly refer to Perspectief and speak with the occupational health expert. You are encouraged to discuss any health problems related to your work in the first instance with your manager and/or HRM; however, you may wish to consult with Perspectief for medical advice and assistance if you are concerned that you cannot perform at work to the best of your ability because of a health problem.

If you choose to self-refer to the service, then details of discussions will not be supplied to Wittenborg or to any other person without your consent. However, where the circumstances are of a serious nature or require workplace adjustments, Perspectief may be obliged to inform Wittenborg to ensure that we can meet our duty of care to you.

3.1 Occupational Health Expert

Occupational health experts that can advise Wittenborg on matters related to health and safety at work and avoiding absenteeism are available to all Wittenborg employees through Perspectief. Wittenborg and its staff members have a dedicated adviser at Perspectief that you are free to contact as an employee. The contact details of the current adviser are published in Staff Resources.

Please note that the occupational health expert and service provided by Perspectief is only available to staff members working as part of an employment contract with Wittenborg.

3.2 Company Doctor

Access to a company doctor ensures sustainable employability. As such, access to the company doctor is a basic facility offered by Wittenborg to all employees. The company doctor is a certified medical professional who specialises in work and health.

The company doctor is involved in the supervision and guidance on absenteeism due to sickness and in the reintegration of employees to work after a period of sickness.

In the event of sickness, only the company doctor can declare you unfit for work. The company doctor makes an assessment and based on this gives advice into the appropriate steps, pace and timing of a reintegration to work. The process of reintegration is further outlined in the General Staff Handbook (AOG-Part 3).

Furthermore, the company doctor is available for all employees of Wittenborg as part of a working conditions consultation hours (*Arbeidsomstandigheidsprekuur*). You can contact the company doctor with health-related questions in connection with your work. This also applies to you when you are not ill. If such a consultation takes place, this does not have to be requested or made known to Wittenborg. Wittenborg is not informed about the consultation, not about the reason and not about the results that can potentially be traced back to you. The company doctor includes the results of the consultations at an overarching level in his prevention advice. In doing so, the company doctor observes the medical confidentiality of the profession. Not only do you have access to the company doctor on paper, via the internet or by telephone, but you are also given the opportunity to speak to the company doctor in person. The aim is to tackle and prevent possible health risks, and to promote sustainable employability.

Information on how to contact the company doctor is provided in Staff Resources.

In addition, the company doctor is involved in voluntary periodical medical examinations (PMO) that are offered to all Wittenborg employees.

Please note that the company doctor and service provided by Perspectief is only available to staff members working as part of an employment contract with Wittenborg.

3.3 PMO

According to Article 18 of the Dutch Working Conditions Legislation, as the employer, Wittenborg must periodically offer its employees an occupational health examination (PAGO). The aim of those examinations is to prevent the risks that work entails for the health and safety of workers. Instead of offering only a PAGO that is solely focused on work-related risks to health and safety, Wittenborg has chosen to offer the more extensive periodical medical examination (PMO) to its staff members. The PMO is a general medical examination, and next to examining work-related risks, it includes a focus on general health and well-being of staff members to offer a more comprehensive and holistic perspective. Based on the PMO, the occupational health and safety service advises Wittenborg on additional measures that may need to be taken to improve health and safety at work and further reduce risks, including measures for early prevention of illness.

The frequency of offering of the PMO depends on the severity of the risks present and can be adapted if needed, but in principle Wittenborg intends to offer the PMO every two years. Part of the content of the PMO at Wittenborg is based on our individual RI&E and as such perfectly adjusted to the working conditions and environment at Wittenborg. This is safeguarded in consultation with Perspectief.

4 Company Emergency Response

The Dutch Working Conditions Legislation stipulates that companies are obliged to take measures in the field of company emergency response (*bedrijfshulpverlening, BHV*). Every employer is obliged to organise good company emergency response services and to appoint one or more emergency response officers (BHV'ers) in this context. The appointment of a company emergency response officer helps to increase safety in the company. An emergency response officer is an employee who is trained to provide assistance to employees and visitors in dangerous situations. For example, an emergency response officer knows how to evacuate people out of a burning building and how to provide first aid in the event of an accident, such as resuscitation and putting on bandages.

Details about who the emergency response officers are at Wittenborg and how to contact them can be found under Staff Resources, as well as on screens and information signs at our locations.

Wittenborg follows the following guidelines with regard to BHV:

- Wittenborg works with Medprevent for emergency response training of its employees.
- Wittenborg strives to have at least two trained emergency response officers per location.
 - In the event of long-term absence of a training emergency response officer, for example through sickness or maternity leave, Wittenborg ensures that an additional staff member is trained and certified to make sure that two trained emergency response officers remain per location.
- Wittenborg does not force staff members to become emergency response officers but rather relies on those who voluntarily commit to this responsibility and are interested in receiving the associated training.
- After initial certification, Wittenborg facilitates refresher courses and re-certification on a yearly basis.

In addition to its efforts with regard to company emergency response, Wittenborg maintains contact with the external emergency responders, such as the fire department and the police, in the event of accidents.

If you would like to become an emergency response officer, please reach out to the prevention officer, or the HRM department. They will assist you in enrolling you for the emergency response training.

5 Prevention Officer

At all times, Wittenborg has at least one prevention officer as part of its staff. The prevention officer has to be a member of staff and cannot be replaced by an external party. In consultation with Wittenborg's staff representation, it was agreed that the HR Manager is by default appointed as prevention officer. Together with the company doctor and other occupational health and safety service, the prevention officer works on ensuring healthy and safe working within the company. The prevention officer performs a bridging function between Wittenborg and staff members and is an accessible point of contact for Wittenborg employees.

The most important tasks of the prevention officer are:

- Supporting Wittenborg to achieve optimal working conditions. This is done through the RI&E. The prevention officer supports with the preparation of an overview of all risks regarding safety, health and well-being within the company. This results in the RI&E. The RI&E gives Wittenborg quick insight into where improvements are needed or desired.
- Advising and working closely with the occupational health and safety experts (and if applicable, the staff representatives) on the measures to be taken for a good working conditions policy. The prevention officer contributes to the plan of action. The prevention officer must advise and work together with the company doctor and the occupational health and safety service. This is done through regular consultations between Perspectief and the prevention officer.
- The (co-)implementation of occupational health and safety measures. As the prevention officer is part of Wittenborg staff, they are accessible and make an active contribution to keeping the risk of health complaints and accidents at work to a minimum, such as neck and shoulder strain from computer work, or stress caused by work pressure. The prevention officer performs a bridging function between Wittenborg and employees and ensures that attention is paid to the risks described in the RI&E. For example, the prevention officer creates how-tos and checklists to ensure that employees are aware of and adhere to health and safety guidelines.
- Coordinating the company emergency response by ensuring adequate training and timely renewal of certificates of Wittenborg emergency response officers.

Details about who the prevention officer is at Wittenborg and how to contact them can be found under Staff Resources.

6 Work and Rest Periods

The [Dutch Working Time Legislation](#) (*Arbeidstijdenwet*) regulates, among other things, how long employees are allowed to work and when they are entitled to breaks or rest periods. By law, breaks are interruptions of work and cannot be taken at the beginning or end of the workday to shorten its duration.

Wittenborg's standard office and working hours are Monday to Friday, 08:00–18:00. A standard full-time working week consists of 40 hours, with a standard workday lasting 8.5 hours. This includes a paid 30-minute lunch break and two unpaid 15-minute coffee breaks. For professional staff, specific working hours, rest periods, and break times are outlined in their employment contracts.

For faculty members, working hours depend on the agreed timetable. Depending on their position and tasks, working outside standard office hours may be required. Faculty may be scheduled to work between 08:00 and 22:00, including weekends if necessary. Work and rest periods for faculty are specified as part of the timetabling and lesson planning process. Standard lesson time slots and break times are detailed in the Education & Examination Guide (EEG).

Staff members working on an assignment (who are not faculty) are expected to independently plan their work schedules while ensuring they take appropriate rest periods and breaks.

Wittenborg encourages all staff members to maintain a healthy work-life balance. Employees are expected to adhere to normal working hours, avoid overtime, and take sufficient breaks throughout the workday to safeguard their health and well-being. Working hours must be registered in the calendar and shared with both the team and manager. In principle, working hours should align with standard office hours. Wittenborg registers employee working hours in NMBRS and tracks holidays and sick leave.

6.1 Right to Disconnect

Wittenborg recognizes and supports the right to disconnect (see the Communication Policy in AOG-Part 3 for further details). Staff members are encouraged to limit professional communication to Wittenborg office hours. Employees are not expected to check their work accounts or respond to messages outside of their designated working hours. To support this, Wittenborg recommends turning off work-related notifications (e.g., Outlook, Teams) outside working hours.

In cases of exceptional emergencies or urgent matters that cannot wait until office hours resume, staff members may be contacted directly via their mobile phones.

6.2 Overtime and Extra Hours

Unless otherwise agreed upon, Wittenborg does not expect staff to work overtime or outside of standard working hours. If additional hours are necessary, they must be approved by the manager, registered in the calendar, and reported to HRM. Overtime regulations differ for professional staff and faculty based on contract type. The specific policies for each category are outlined in:

- Faculty Handbook (AOG-Part 4)

- Professional and Support Staff Handbook (AOG-Part 5)

6.3 Legal Compliance

Wittenborg complies with Dutch labour laws at all times. However, certain legal exemptions apply to employees who:

- Earn at least three times the minimum wage
- Are employed as scientific researchers

6.3.1 Legal Rest Periods

- All staff members have at least 11 consecutive hours of rest within 24 hours (1 day).
 - This can be shortened to 8 hours once per week, if absolutely necessary for the job.
- All staff members have at least 36 consecutive hours of rest within 168 hours (1 week/7 days).
 - This can partly be spread over 14 days. In that case, there should be at least 2 periods of 32 consecutive hours each within 336 hours (2 weeks/14 days).

6.3.2 Legal Breaks

- In the case of more than 5.5 hours of work: 30 minutes (potentially 2 x 15 minutes)
- In the case of more than 10 hours of work: 45 minutes (potentially 3 x 15 minutes)

6.3.3 Maximum Legal Working Hours

- Per day: max. 12 hours
- Per week: max. 60 hours
 - Per week, per 16 weeks: 48 hours
 - Per week, per 4 weeks: 55 hours

6.3.4 Working on Sundays

Working on Sundays is only possible if this is necessary for the work and contractually agreed. There need to be at least 13 Sundays per year which are free of work.

6.4 Tips

We have compiled tips on taking sufficient breaks and using them to be active as part of our 'Health and Safety Tips' Checklist available under Staff Resources.

7 Psychosocial Workplace Hazards (PSA)

Wittenborg is committed to protecting its staff members against psychosocial workplace hazards (*psychosociale arbeidsbelasting, PSA*) that can lead to work-related stress. The most significant types of PSA are:

1. Work pressure
2. Unacceptable behaviour, such as but not limited to sexual intimidation, discrimination, aggression, violence and bullying, etc.

Work pressure that is either too high or too low can cause stress. Pressure can be caused for a variety of reasons, such as:

- Too much work in too little time
- Too few tasks and not being challenged
- Not being able to properly plan, organise and spread work
- Not having a control over the spread of the workload or tasks
- Set unrealistic and unachievable goals with regard to work
- Objectives that are regularly being adjusted
- Having to use faulty equipment, or equipment that is not user-friendly, and technical problems
- Having conflicts with supervisors
- Not taking enough breaks or vacations
- Problems in the work and private environment, such as tension or illness in one's private life
- Being unable to say 'no'
- Being too perfectionist

A combination of high workload and too little rest and relaxation can cause psychological and physical complaints and eventually lead to illness and absenteeism. The employee runs the risk of overstrain, burnout, depression and post-traumatic stress disorders. On the other hand, too low a workload can also entail risks. Employees who have too little to do or do not see a challenge in their work or do not have career opportunities, can become frustrated as a result and can develop psychological and physical conditions.

Forms of unacceptable behaviour, as well as our commitment to protect staff members from such behaviour, are detailed in our Code of Ethical Behaviour (AOG-Part 10). Unacceptable behaviour infringes on the well-being and dignity of staff members and can mentally/physically hurt them. As such, all forms of unacceptable behaviour at work are a cause of work-related stress that can lead to depression, post-traumatic stress disorders, burnout and other types of physical and psychological conditions.

Wittenborg adopts a PDCA cycle to check and evaluate the existence, causes and possible prevention of PSA.

7.1 Facilities to Prevent Work Pressure

The aforementioned service of the occupational health and safety service, including working conditions consultation hours, access to the occupational health expert and the PMO, are important measures

implemented to protect staff members against work pressure. In addition to those Wittenborg implements and encourages the following:

7.1.1 Open-Door Policy and Transparency

Wittenborg has an open-door policy in which voicing concerns, pointing out problems and speaking freely are strongly encouraged. It is our promise to staff members that input, question and concerns from staff members related to work pressure will never be used against staff members and will be taken seriously. As a flat organisation, we encourage open communication across departments and levels of the organisation, enabling not only an exchange of knowledge and tools, but also ensuring that awareness is created early on and appropriate actions can be taken.

Furthermore, Wittenborg is committed to transparency in all aspects of the organisation. All plans, ambitions, changes and developments, etc., are being widely and announced to ensure that staff members are being kept up to date about the journey of Wittenborg.

7.1.2 Annual Development Talks

Annual development talks are outlined in the Faculty Handbook (AOG-Part 4) and Professional Staff Handbook (AOG-Part 5). The development talk includes an open conversation about stress, work pressure and workload allocation and discusses support that is needed to achieve a better work-life-balance. As such, the development talk is a formal way of ensuring that work pressure and work-related stress are being openly discussed and dealt with. Furthermore, the development talk centres on opportunities to grow and develop. A personal development plan should be developed, including the support of Wittenborg and a clear perspective.

7.1.3 Key Role of Managers

Managers at Wittenborg are “buddies” to their team members, actively involved in their development and growth. Wittenborg managers are trained to be mindful of signals of work pressure and work-related stress in their team members and intervene accordingly. There should be regular contact moments between managers and their team members, not only focused on tasks at hand, but also focused on getting to know each other, and building mutual trust and understanding, and having open conversation about how people are feeling. Managers have the responsibility to make work pressure and stress the subject of regular talks, thereby leading by example and making this an acceptable topic of discussion.

Next to this, managers are responsible for ensuring that there is good planning and coordination within the team, that tasks and expectations are clear and well communicated. In addition, they have to ensure that team members have the possibility and feel encouraged to raise any concerns related to planning, deadlines, tasks or expectations. Mistakes should be discussed openly and seen as moments to learn from.

Additionally, managers are also encouraged to lead by example in small ways, such as discussing hobbies, and taking regular leave themselves, thereby showing staff members the importance of this but also emphasising that things do not fall apart when you take time off, which is something that some people might benefit from as a type of encouragement.

7.1.4 Leave Policy

Wittenborg places great value on creating a good work-life balance for staff members. Our leave policy is a critical part of that effort. Wittenborg offers numerous leave options for different circumstances, such as holidays, care leave and special leave. Our annual leave policy (AOG-Part 3-General Staff Handbook) is designed in a way as to encourage taking regular holidays and ensuring that those are spread in a good way throughout the year.

7.1.5 Wittenborg Family

Further building and strengthen what we call the Wittenborg Family as part of our organisational culture also helps to prevent work pressure and work-related stress. This is practised through the following:

- Celebrating successes together.
- Complimenting each other and building each other up.
- Talking about mistakes and learning from them.
- Helping each other, on an individual and on a team level, by making sure that there is extra support during busy times, for example from other departments.
- Doing things together as a team, such as taking breaks together, but also having team outings.
- Being aware of early signals of work pressure in yourself and in your colleagues and addressing them, such as:
 - Tiredness
 - Losing concentration
 - Mood swings
 - Weight gain or loss
 - Sweating
 - Losing interest
 - Reacting impulsively
 - Feeling rushed
 - Trembling
 - Palpitations

7.1.6 Tips

It is important that everyone at Wittenborg takes the responsibility to prevent work pressure and work-related stress.

Next to taking into consideration the aforementioned sections, it is important to keep an eye on your individual level of work pressure and stress. That means being mindful of the early signals outlined above. In addition, there are easy-to-use online tools available to test your level, for example:

[Sneltest Werkdruk](#)

[Zelftest werkstress - GGZ Drenthe](#)

When you feel work pressure or stress, let your manager know and try to look for solutions.

Easy ways to make sure that you have time to relax and unwind are:

- Stick to official working times and do not overwork – remember that work will never be “done”.
- Turn off your notifications (Outlook, Teams) on your devices during your rest periods.
 - You are not expected to answer e-mails or messages outside of working hours. If there is an urgent problem or emergency, we will call you.
- Follow training or tutorials on time management, mindfulness, etc. There are plenty of online tutorials and tools that can assist you with these skills.
- Follow our checklist on ‘Health and Safety Tips’ available under Staff Resources.
- Take sufficient vacations and do not let your holiday hours build up.

Your manager, team, the prevention officer, HRM and the occupational health and safety expert are all there to support you. Reach out and discuss any concerns or problems early on.

7.2 Facilities to Prevent Unacceptable Behaviour

Like the rest of our Health and Safety Policy, our policy to prevent unacceptable behaviour is reviewed in a PDCA manner on a yearly basis, including an assessment and evaluation of incidents.

Some of the facilities mentioned to prevent work pressure also apply to the prevention of unacceptable behaviour and/or work-related stress caused by such behaviour. Our open-door policy, the support of managers, the team building efforts and support culture are critical to preventing unacceptable behaviour and being able to spot and effectively deal with instances of misconduct. In addition, there are specific facilities that are meant to prevent and tackle unacceptable behaviour at Wittenborg.

7.2.1 Code of Ethical Behaviour

Wittenborg has a clear commitment against any type of unacceptable behaviour as outlined in our Code of Ethical Behaviour (AOG-Part 10). We expect our staff members to stand against any type of unacceptable behaviour and support each other in preventing it. Wittenborg students are also obliged to comply with the Student Code of Behaviour. Any unacceptable behaviour from a student towards another student or staff member will not be tolerated and can ultimately lead to termination of the study agreement.

7.2.2 Confidential Adviser for Unacceptable Behaviour

Our confidential adviser (CA) is an important component of our policy aimed to protecting our staff members. The CA is a point of contact for staff members with problems or questions regarding unacceptable behaviour, such as but not limited to sexual intimidation, harassment, discrimination, bullying, or aggression and violence (please refer to the Code of Ethical Behaviour (AOG-Part 10) for details).

The CA 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 CA under strict confidentiality. The most important tasks of the CA are:

- Providing initial care for employees who have experienced unacceptable behaviour and who need help and advice.
- To examine whether a solution following an informal procedure is possible.
- Inform the victim about other solutions, such as complaints procedures.
- If desired, advising and supporting the employee in raising the matter as part of the formal complaints procedure or to management.
- Referring the victim to other aid agencies, for example, a mediator.
- Providing information about Wittenborg's approach to unacceptable behaviour
- Advising and supporting managers in preventing undesirable behaviour.
- Recording cases (anonymised) of undesirable behaviour.

A CA always treats the information of employees confidentially.

The CA only involves or informs third parties with the explicit permission of the staff member who has sought advice, but keeps an anonymised record of incidents and advises Wittenborg on the adjustment of its policy based on the incident recorded.

Details about who the CA is at Wittenborg and how to contact them, can be found under Staff Resources.

7.2.3 Information and Instructions

Wittenborg staff members are kept informed and updated about our code of ethical behaviour, our confidential adviser, and the complaints procedure as part of Staff Resources and announcements.

In addition, this is a fixed and recurring topic in team meetings and managers are encouraged to regularly point out the facilities in place.

7.2.4 Training for Managers

To be able to prevent unacceptable behaviour and embed the commitment against this in Wittenborg culture, Wittenborg managers receive training to be able to:

- Spot and recognise unacceptable behaviour
- Know how they should intervene
- Recognise and understand the need to lead by example

Managers are actively encouraged through training, as well as mentoring talks, not to ignore misconduct.

7.2.5 Victim Aftercare

An incident of unacceptable behaviour can lead to physical and psychological damage to the victim in the short or long term. Therefore, adequate care and aftercare is needed for victims. This also holds true for staff members who were wrongly accused of unacceptable behaviour. Wittenborg offer aftercare that can consist of the following:

- Temporary adjustments of tasks (manager).

- Support with complaints procedure or filing police reports (manager, confidential adviser, or HRM).
- Referral to professional trauma care (manager, confidential adviser, or HRM).
- Assessment as to whether or not the relationship between the victim and the perpetrator can be restored, and how this can be arranged and guided (manager, confidential adviser or HRM).

This is dependent on the individual circumstances and the wishes of the victim. Aftercare is started within 2 days of the incident being reported. If the victim initially declines the aftercare measures, the offer will be made again after 2 weeks.

As Wittenborg's staff body is very diverse, understanding the impact of cultural differences on coping with incidents and stress factors is very important. People from different backgrounds have different views on getting help or discussing personal feelings or issues. Possible stigmas around mental health can affect a person's willingness to seek help. Every choice in this regard is fully respected.

8 Physical Strain

The risk of physical strain at Wittenborg mostly exists in computer work, as most of us at Wittenborg spend our time working on computers. Unfortunately, computer work comes with certain risks, such as eyestrain, neck, arm or shoulder complaints, etc. In order to prevent those problems, Wittenborg implements a number of measures.

It is important to remember to notify Wittenborg if you are developing physical complaints, such as (but not exclusive to) muscle aches, headaches, neck, shoulder or arm pain, eye complaints, etc. Being alert and spotting problems early on is crucial to avoid long-term or more serious health and safety concerns. It is part of your responsibility to be open about any issues you are experiencing and to notify Wittenborg, and thus enable Wittenborg to take appropriate measures to support you.

8.1 Facilities to Prevent Physical Strain

8.1.1 Ergonomic Workspace

All Wittenborg workspaces are equipped with adjustable chairs and tables, allowing you to adjust your workspace to your individual dimensions, as well as to switch between standing and sitting when working at your desk. Equipment at Wittenborg also fulfils ergonomic guidelines.

Guidelines on how to adjust your workspace and ensure that it enables you to work in a healthy and safe way are available under Staff Resources in our 'Health and Safety Tips' checklist.

8.1.2 Additional Equipment

On request, and provided that there is a medical indication, Wittenborg offers additional equipment, such as chairs, computer glasses and ergonomic mouses. If you need special equipment, please contact the HRM Department to request this. Please note that there are compensation limits in place for the different items.

8.1.3 Breaks and Exercise

As described earlier, Wittenborg expects its employees to actively pursue a good work-life balance. We expect you to adhere to normal working hours, to avoid over hours and to take sufficient breaks during your working day to ensure your health and safety.

Physical strain can be prevented taking regular breaks from your computer, walk over to the printer, get a cup of tea or coffee, do some stretching exercises and give your eyes a rest.

Some more practical tips and exercises to prevent physical strain can be found under Staff Resources in our 'Health and Safety Tips' checklist.

9 Working from Home

As the employer, Wittenborg is responsible for ensuring a healthy and safe work environment for employees. This includes the workspace at home. As such, Wittenborg has the obligation to check the home workspace.

An assessment of the risks associated with working from home and a plan of action on how to prevent and cope with those risks are part of the legally required "Risk Inventory and Evaluation (RI&E)". The most important obligations of employees are:

- Complying with the instructions provided by Wittenborg and the agreements made with Wittenborg.
- Using the right equipment.
- Giving Wittenborg the possibility to check and evaluate the above.
- Notifying Wittenborg of potential threats to health and safety as soon as possible, and if needed repeatedly.

The obligations and rights of employees working from home are written in the Working from Home policy, that can be found in AOG-Part 5. A staff member can apply to occasionally work from home by filling in the working from home request form, which entails questions to determine whether the workspace fulfils the ergonomic guidelines. Evidence has to be provided by sending pictures of the workspace.

When working from home it is important to:

- Have proper agreements on your working times, planning and meetings.
- Maintain a clear division in work and private time.
- Have clear instructions on communication methods.
- Take regular breaks and avoid working longer than your working hours.
- Keep connected with your colleagues/supervisor. Sparring with a colleague can reduce stress and bring solutions or a different point of view on issues.

10 Special Regulations

10.1 Pregnant Staff Members and New Mothers

There are special rules with regard to the work of pregnant staff members and those who have recently given birth, taking their specific circumstances into consideration.

When you are pregnant, you are entitled to extra break time of up to 1/8 of your normal working time, for example 1 hour of extra breaks if you work 8 hours per day. This right continues until 6 months after the birth of your child.

For information on applying for pregnancy and maternity leave, please refer to our General Staff Handbook (AOG-Part 3). For other special regulations and right, please see the following sections.

If you are pregnant, you are not allowed to work from 28 days before the expected delivery to 42 days after the birth of your child.

10.2 Breastfeeding

You have a right to feed your baby. That means that during the first 9 months after the birth of your child, you may interrupt your work for breastfeeding or to pump. You can do this for as often and as long as necessary, up to a maximum of ¼ of your working time per day. For example, if you work for 8 hours per day, you can interrupt your work for pumping or breastfeeding for up to 2 hours per day.

Time taken for breastfeeding and pumping is paid. You should only use the time that you need for this purpose, the ¼ is to be seen as maximum if needed.

Wittenborg provides access to a lactation room to new mothers who are breastfeeding at any of its locations. The lactation room is a designated and safe room that can be locked, and is equipped with a chair, a sink, and a form of climate control. Instructions on where to find and how to use those rooms, are available under Staff Resources.

10.3 Additional Rights during Pregnancy and 6 Months after Giving Birth

To summarise your rights during pregnancy and after giving birth, please consult the table below as an overview:

Extra breaks	Max. up to 1/8 of your normal working time per day. For example, extra breaks of max. 1 hour when employed for 1 FTE and working 8 hours per day. Those breaks are seen as working time (paid).
Stable work pattern	No over hours

Reduced (max) working time	<p>Max. 10 hours per day</p> <p>Max. 50 hours per week, average over 4 weeks</p> <p>Max. 45 hours per week, average over 16 weeks</p>
Doctor's appointments and examinations during working hours	Paid, if those need to be planned during working hours

10.4 Underage Staff Members

Wittenborg sometimes engages teenage part-timers for odd jobs. Children from the age of 13 can work at Wittenborg as part of a part-time job, only performing light work. Both Wittenborg and the parents of the child are responsible for ensuring that rules related to health and safety and working times are being adhered to.

In general, light work is allowed for 13-, 14- and 15-year-olds. This means that the work should not be too heavy and should not pose a danger or be harmful to their (physical and mental) health. 13 and 14-year-olds are only allowed to perform odd jobs but not independent production work and there must always be someone who supervises them. Because it is important for 13, 14 and 15-year-olds that school performance does not suffer from their part-time job, the regulations make a distinction between a 'school week' and a 'holiday week'. A school week exists if educational activities take place on one or more days during that week.

Tasks that are not allowed for teenage part-timers (non-exhaustive):

- Specified under Working Conditions Legislation (*Arbowet*) to be prohibited or subject to additional safety measure
- Working under pressure and stress
- Working with money
- Working in one posture
- Lifting and carrying loads of more than 10 kilo
- Pulling or pushing of items of more than 20 kilo
- Working with equipment involving danger of fire, electrocution, cut, fall, pressure, or crushing

School work also counts as working time for teenagers. Therefore, their work and rest periods need to be adhered to, taking into consideration both school time and working time.

Work and rest periods that Wittenborg adheres to at all times and supervisor should be aware of:

Category	During a school week	During a vacation week
----------	----------------------	------------------------

13- and 14-year-olds	No work on Sundays	No work on Sundays
	14 hours rest per day, including the period from 19:00 – 07:00	14 hours rest per day, including the period from 19:00 – 07:00
	12 hours of work per week	35 hours of work per week
	7 hours of work per day	7 hours of work per day
	No work on school days	Maximum 5 days of work per week
		Work is allowed during maximum of 4 weeks of vacation per year, out of which maximum of 3 consecutive vacation weeks
15-year-olds	Work on Sundays under conditions, but Saturday before has to be a day off and minimum of 5 Sundays per 16 weeks have to be free days.	Work on Sundays under conditions, but Saturday before has to be a day off
	5 days of work per week	5 days of work per week
	12 hours rest per day, including the period between 19:00 – 07:00.	12 hours rest per day, including the period between 21:00 – 07:00.
	12 hours of work per week	40 hours of work per week
	Per day: 2 hours of work on schooldays and 8 hours of work on non-schooldays	8 hours of work per day
		Work is allowed during a max. of 6 weeks of vacation per year, out of which a max. of 4 consecutive vacation weeks

For 16 and 17-year-olds, the regulations differ:

Daily rest periods	12 consecutive hours per 24 hours, including the hours between 23:00-06:00
Weekly rest periods	36 consecutive hours per week (7 days)
Breaks	In the case of work of more than 4.5 hours: 30 minutes (potentially 2x 15 minutes)
Work on Sundays	No work on Sundays unless necessary for the job. At least 13 free Sundays per year.
Working times	Per day: max. 9 hours Per week: max. 45 hours Per week, per 4 weeks: max. 40 hours

10.5 Working for Other Employers Besides Wittenborg

If you are working for more than one employer, you are required to notify Wittenborg of this. This is needed to ensure that your work does not interfere with your responsibilities at Wittenborg and/or negatively affects your health and safety.