The new Global Office Integrity process: A commitment to ethics and transparency

1. Integrity policy

This new policy helps us prevent fraud, harassment, and misconduct while promoting a culture of integrity and accountability. Older policies have been combined into a simpler, clearer integrity system.

Meeting global standards – Our new integrity policy follows international best practices and legal requirements. In the policy we describe how we keep the subject "alive" in a positive way.

Clear responsibilities – **A Complaints Coordinator (DoR)** oversees integrity policies and ensures they are followed.

Brief summary of process steps (see next Page)

Describes the situations and first steps to be taken in the process for Global office staff and the procedure for stakeholders, external contacts and Network Offices staff.

2. **Two key documents explain how misconduct and complaints are handled:**
   - **2.1 Handling and reporting misconduct for Global Office staff** – How Global Office staff can report a misconduct and the handling of the misconduct, ensuring fairness, confidentiality, whistleblower protection, and support for all parties involved.
   - **2.2 Complaints procedure for stakeholders, external contacts and Network Offices staff** – How external complaints are managed; detailing the process for informal and formal complaints, investigation and resolution timelines, escalation and appeal options, whistleblower protection, and transparency measures to ensure accountability and fairness.
3. **Code of Conduct**

   Employees, volunteers, and partners commit to following ethical standards. This also encourages employees to talk about ethics and integrity in their daily work. This policy also encourages preventing conflicts of interest, fraud, and inappropriate behavior.

Updated & streamlined process – a**ccessible & open** – Our Code of Conduct and Complaints Procedure are available online for transparency. By following this process, we ensure a safe, respectful, and ethical working environment for everyone. Integrity is a shared responsibility—let's uphold it together!

Process steps

Step	Handling and reporting misconduct (Global Office staff)	Complaints procedure (Stakeholders, external contacts, Network Offices staff)
Informal approach	Encouraged to resolve informally with the concerned party; if not, report to supervisor, HR Officer, or External Confidential Advisor.	Encouraged to resolve informally through direct communication, mediation, or feedback.
Formal reporting	Submit a letter or email to Complaints Coordinator or External Confidential Advisor; must include name, contact details, date, and issue description.	Submit a letter or email to Complaints Coordinator; must include name, contact details, date, and issue description.
Acknowledgment	Complaints Coordinator confirms receipt within 5 working days and logs the misconduct.	Complaints Coordinator confirms receipt within 5 working days and logs the complaint.
Investigation	Complaints Coordinator gathers information, involves all parties, hearings may be held and compiles an investigation report. The Complaints Coordinator aims to resolve the misconduct within 6 weeks. If an extension is necessary, they will not exceed 4 additional weeks.	Complaints Coordinator investigates; CEO takes over if necessary; hearings may be held. The Complaints Coordinator aims to resolve the misconduct within 6 weeks. If an extension is necessary, they will not exceed 4 additional weeks.
Decision and resolution	Management Team reviews and decides within two weeks; actions range from no action, warnings, training, suspension, or termination.	Management Team reviews and decides within two weeks; actions taken depend on severity.
Appeal and escalation	Appeals can be made to Supervisory Council; if dissatisfaction remains, escalate to Partos.	Appeals can be made to Supervisory Council; if dissatisfaction remains, escalate to Partos.
Support for individuals involved	Both complainant and accused have access to External Confidential Advisor and other support services.	Stakeholders and external contacts receive guidance from the External Confidential Advisor.
Whistleblower protection	Whistleblowers are protected from retaliation under Dutch law; reports can be made anonymously.	Whistleblowers are protected from retaliation under Dutch law; reports can be made anonymously.
Transparency and accountability	Complaints register maintained; periodic reviews ensure alignment with best practices.	Complaints register maintained; compliance and review mechanisms in place.