

From The Executive Board

Date June 10th, 2021

Introduction

This document lays down the standards that the DOEN Foundation (hereinafter referred to as: DOEN) considers important for acting with integrity within DOEN and in relation to all other parties involved. The integrity policy builds on existing principles (code of conduct, whistleblowers' scheme, complaints scheme) and is intended to safeguard integrity in a broader context. That is why the code of conduct, the whistleblowers' scheme and the complaints scheme form part of the integrity policy. This integrity policy is partly based on the 'Handreiking integriteitssystemen' (Guide to Integrity Systems), drawn up by 'Goede Doelen Nederland' (the Dutch Charity Lotteries), in which, among other things, the standards and discussion points are described as included in the rules for recognition by the Netherlands Fundraising Regulator (CBF).

Integrity is about behaviour, not about procedures or recording incidents. Its purpose is to create a working, living and learning culture where integrity can and may be discussed and where acting with integrity is a top priority.

DOEN does everything in its power to prevent abuses and violations. But if suspicions of wrongdoing and violations arise, DOEN takes them seriously and responds appropriately. The integrity policy offers everyone involved with DOEN an opportunity to report suspected abuses and violations.

The purpose of the policy is to prevent abuses and violations as far as possible, to deal with them carefully if they do occur, and to account for them appropriately.¹

The integrity policy applies both to situations within DOEN and to possible abuses and violations at organisations supported by DOEN.

Definitions

The following definitions are used in the integrity policy:

- DOEN employee: a person who has an employment contract with DOEN or a person who performs work for DOEN as a trainee or temporary employee.
- Reporter: a person who formally reports a (suspected) breach.
- The manager: a person who directly manages the reporter.
- Confidential advisor: a person appointed by DOEN as confidential advisor.

Within the integrity system, a distinction is drawn between four types of violations:

- Abuse of power: corruption, blackmail, conflict of interest, leaking of confidential information, culpable negligence.
- Financial: fraud, theft, abuse of goods or services made available, gross waste.
- Interpersonal: discrimination, harassment, bullying, sexual harassment, violence, humiliation, sexual intimidation, sexual violence.
- Professional: gross negligence.

¹CBF has introduced a reporting requirement for recognised organisations as of 1 March 2019.

Prevention

DOEN code of conduct

The following code of conduct serves as a guideline for the members of the Supervisory Board, the members of the Executive Board and DOEN employees, while also serving as a basis for the integrity policy.

1. *We work with integrity and care*

This means that in our work we:

- Are honest and trustworthy;
- Do not serve interests that are incompatible;
- Avoid the occurrence of conflicts of interest;
- Create a safe work environment for DOEN employees, partners and their target audiences.
- Act in accordance with DOEN's integrity policy.

2. *We work purposefully*

The interests of our partners are of prime importance.

3. *We work efficiently*

Participants in the charity lotteries can be confident that the contributions DOEN receives from the lotteries are well spent.

4. *We keep confidential information secret*

We do not disclose confidential information about business relations without their consent, unless required by law, court order or regulators.

5. *We are transparent*

We are accountable, both compulsorily and non-compulsorily.

6. *We contribute to society's trust in DOEN and the Dutch Charity Lotteries*

DOEN exists in part thanks to society's trust in the Dutch Charity Lotteries. This means that in our work we do not take unnecessary risks that could damage this trust.

7. *We comply with the applicable legislation and other regulations that apply to our work*

We comply with all the applicable legislation, regulations, codes of conduct and instructions that apply to our work at DOEN and to the charity sector.

Promoting behaving with integrity

DOEN is committed to the integrity of DOEN employees and all other parties involved with DOEN in any way. DOEN promotes behaving with integrity by, among other things:

- Introducing the integrity policy to DOEN employees;
- Incorporating the integrity policy into the DOEN Guidelines;
- Annual discussion of the functioning of the integrity policy with all DOEN employees;
- Reporting on violations in the annual report.

Partners

DOEN has included a clause in its contracts with its partners that refers to the importance of integrity and the potential contractual consequences if partners default on handling reports.

Reports and handling

The integrity policy is intended for situations in which voicing a problem among themselves does not provide a solution or when a situation arises with significant financial, personal and/or reputational risks.

Reporters who act in accordance with this policy can make their report without jeopardising their employment status within DOEN. Any actions taken against reporters who make a sincere report are considered a serious violation of the integrity system. Appropriate actions will then be taken to protect the reporter's employment status. Those responsible for countermeasures may be punished.

If one or more of the aforementioned (suspected) violations occur, individuals who are involved with DOEN in any way (DOEN employees and/or any other parties involved) are entitled to make a report to DOEN of a (suspected) violation.

Hotline for (suspected) violations

A reporting desk for (suspected) violations must be low-threshold and confidential. At DOEN, a report of a violation or suspected violation can be made in a variety of ways.

An important principle is that the reporter is always involved in the follow-up process after the initial contact. The reporter can request that his or her identity not be disclosed. The person involved can withdraw this request at any time. The anonymity of the reporter is thus guaranteed until the reporting desk is legally obliged to disclose the name. In such a case, the DOEN Executive Board will inform the reporter of this before disclosure of the reporter's name takes place.

The ways in which a report can be made are:

1. To the Executive Board.

This includes both anonymous reports and non-anonymous reports. A report about a DOEN employee should always be forwarded by the Executive Board to the HR department.

2. To the HR department.

The HR department also has a role as an integrity officer. Reporting to HR can be done via email or in an interview.

3. Whistleblowers' reporting desk.

A report can be made to an external whistleblowers' reporting desk: the "Huis voor klokkenluiders" (House for Whistleblowers).

4. Confidential advisor.

The role of confidential advisor is to be a discussion partner for the person thinking about making a report. DOEN works with both internal and external confidential advisors.

5. Chairperson of the Supervisory Board.

A report can be made to the Chairperson of the Supervisory Board if the report concerns one or both of the members of the DOEN Executive Board.

6. Reports by outsiders about DOEN partners can be made through the DOEN employees, the Executive Board, the general mailbox or otherwise.

Handling a (suspected) violation

Internal report:

If a DOEN employee suspects that wrongdoing is occurring at DOEN or at another organisation with which that person has come into contact through his/her work (i.e. an organisation supported by DOEN), the DOEN employee involved can report it. The procedure for doing so is laid down in the "Whistleblowers' Scheme" included as Appendix 2 to the Employment Conditions Guide.

The manner in which a report of (suspected) transgressive behaviour is made within DOEN is laid down in the "DOEN employee complaints scheme" included as Appendix 3 to the Employment Conditions Guide.

If a report of (suspected) transgressive behaviour is received by a DOEN employee, the HR department consults with the Executive Board (or Chairperson of the Supervisory Board if it concerns a report about one or both members of the Executive Board) about whether or not to proceed with a formal investigation by an external party. In such a case, a preliminary investigation first takes place (behind the scenes) to determine whether the report is "worthy of investigation". A joint decision is then reached (Executive Board, HR department and external party) as to whether to conduct an investigation.

If the results of the investigation give reason to take corrective action in accordance with the report of misconduct, the Executive Board takes the final decision. In such a case, it is important to obtain legal advice, particularly to determine proportionality and consistency in accordance with the report.

DOEN also supports possible victims of transgressive behaviour and will, where necessary, help them to come to terms with the situation.

External report:

If a report is received of (suspected) transgressive behaviour at one of the organisations supported by DOEN, the Executive Board contacts the Executive Board or the Chairperson of the Supervisory Board/ Management Board (if the report concerns the Executive Board itself) of the organisation in question with a request to investigate the matter and to share the results with DOEN. Should the organisation in question not have a policy on this, reference can be made to the way DOEN handles reports (see above). DOEN will also point out the importance of support for any victims of transgression.²

If such a report is not handled appropriately, the DOEN Executive Board may decide to review the relationship with the partner in question.

Learning process

In order to prevent integrity from being compromised, it is very important to pay constant attention to this issue. For this reason, attention will be paid to this issue at least once a year. Discussions about integrity with our partners are also important. It should be clear that attention will also be paid to this issue when discussing proposals and progress reports in Team Consultations and/or Project Consultations.

By paying regular attention to integrity and sharing experiences, acting with integrity remains an important focal point for everyone at DOEN.

Accountability

In the annual report, the following points are addressed with regard to integrity:

- Number of reports/violations
- Nature of the reports/violations
- The handling of reports/violations
- Reflection on the integrity policy.

²Partners in the Arts & Culture sector in the Netherlands, for example, can use *Mores.online*, to which reporters of sexual harassment can turn with complaints and for possible support through independent, professional confidential advisors.