



## **Integrity Policy**

Codes of Conduct and Procedures  
for Good Employer/Employee Practice

**Stichting Aids Fonds- STOP AIDS NOW! – Soa Aids Nederland**

Adopted by the Executive Board after consultation with/approval of the Works Council dated 24 November 2009; previously amended in 2013; amended and re-adopted by the Executive Board after consultation with/approval of the Works Council in March 2018.

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### Adoption and validity

The Integrity Policy and the codes of conduct and procedures included therein have been approved by the Executive Board of Stichting [Foundation] Aids Fonds – STOP AIDS NOW! – Soa Aids Nederland, having its registered office in Amsterdam, referred to hereinafter as “the Foundation”, after consultation with, or with the approval of, the Works Council of the Foundation (with this being pursuant to the (Dutch) Works Councils Act [*Wet op de ondernemingsraden*, “WOR”], Section 27(1)(j): complaints procedure).

The Integrity Policy and the codes of conduct and procedures contained therein first took effect on 1 December 2009 and were re-adopted after amendment with effect from March 2018. As of that date, all previous versions of said codes of conduct and procedures within the scope of the Integrity Policy ceased to apply.

The Integrity Policy and the preventive codes of conduct and procedures included therein may be amended by the Executive Board of the Foundation after consultation with, or with the approval of, the Works Council of the Foundation (WOR, Section 27(1)(j)). Any such amendment will take effect on a date determined by the Executive Board.

This protocol is without prejudice to any power or provision arising for the Works Council from legislation, terms and conditions of employment of Aids Fonds – STOP AIDS NOW! – Soa Aids Nederland, or other applicable regulation.

## 1. Introduction

The Foundation's reputation and the confidence of its current and future stakeholders are essential for the successful completion of our missions regarding HIV/AIDS and other STIs. Our relationships with stakeholders and our day-to-day operations are guided by our core values: **an unprejudiced, reliable, careful, helpful and respectful approach, open, professional and morally responsible.**

The various codes of conduct and procedures have now been brought together in this Integrity Policy, with which we hope to guarantee integrity within our organisation and, where necessary, to promote it even further.

Our Integrity Policy and the associated codes of conduct and procedures are based on our core values and determine how we work. The Integrity Policy is supported and promoted by our Works Council and Executive Board. As employees and employer, we act in accordance with the policy and with respect for others and for ourselves.

Executive Board of Stichting Aids Fonds – STOP AIDS NOW! – Soa Aids Nederland

## 2. Definitions

In this Integrity Policy and the codes of conduct and procedures included therein, the following terms have the meanings assigned to them below:

Employee:	All persons, regardless of gender, who are employed by the employer for a fixed or indefinite period of time, including permanent and/or temporary workers, on-call employees, employment agency staff ("temps"), seconded employees, interns, and volunteers;
Person Concerned:	A person, whether or not employed pursuant to an employment contract, who carries out work for Stichting Aids Fonds – STOP AIDS NOW! – Soa Aids Nederland and reports a suspected abuse pursuant to these regulations;
Employer:	Stichting Aids Fonds – STOP AIDS NOW! – Soa Aids Nederland, having its registered office in Amsterdam;
Organisation:	Stichting Aids Fonds – STOP AIDS NOW! – Soa Aids Nederland, having its registered office in Amsterdam;
Foundation:	Stichting Aids Fonds – STOP AIDS NOW! – Soa Aids Nederland, having its registered office in Amsterdam;
Executive Board:	the Executive Board of the Foundation;
Supervisory Board:	the Supervisory Board of the Foundation;
Works Council:	The consultation and participation body elected by employees within an organisation with at least 50 employees. The Works Council consists of employees who, on behalf of the other employees, consult with the employer about company policy and the interests of the employees in accordance with the Works Councils Act;
Superior:	The person who is directly in charge of the person concerned;
Confidential Counsellor:	The person appointed by the Executive Board to act as such for the Organisation;
Adviser:	Any person who enjoys the trust of the employee and who is subject to a confidentiality obligation;
External Third Party:	An external third party as referred to in Section 8.2 of the Whistleblower Regulations [ <i>klokkenluidersregeling</i> ];
Integrity:	The upholding by employees of general or professional social and ethical standards and values of the Organisation, even in the event of external pressure to deviate from these;
Violation of integrity :	All ways in which the general or professional social and ethical standards and values of the Organisation are transgressed, in particular the presence of inadmissible behaviour, fraud, corruption, or abuse within the Organisation;
Inadmissible Behaviour:	All forms of social isolating, making work unpleasant, bullying, mocking, gossiping, threatening, physical violence, racism, discrimination or sexual intimidation, in any implicit or explicit form that the person concerned (male or female) perceives as undesirable and is thereby hindered in the performance of his/her work, as described in the Code of Conduct on Interpersonal Behaviour;

Fraud:	Any international act or omission performed in order to obtain an unfair or illegal advantage;
Corruption:	The misuse of power entrusted to a person for personal benefit. Corruption harms anyone whose life, livelihood, or happiness depends on the integrity of people in a position of authority;
Abuse:	<ul style="list-style-type: none"><li>• a criminal offence (or the threat of such);</li><li>• a gross violation of legislation and regulations or policy rules (or the threat of such);</li><li>• a serious danger to public health, safety, or the environment;</li><li>• deliberate misinformation of public bodies (or the threat of such);</li><li>• waste of public money or donor money (or the threat of such);</li><li>• deliberately withholding, destroying, or manipulating information about these facts (or the threat of such);</li></ul>
Suspicion of an abuse:	A suspicion, based on reasonable grounds, of an abuse within the Foundation.

## 3. Integrity Policy

### 3.1. Introduction

Numerous definitions and descriptions of “integrity” are in circulation. For the Foundation’s employees, a definition has been chosen that is appropriate to us; it is worked out in practical terms below.

We understand by integrity:

***The upholding by employees of general or professional social and ethical standards and values of the Organisation, even in the event of external pressure to deviate from these.***

We see Integrity Policy as the framework within which the active application, monitoring, improvement, and discussion of professional behaviour is appropriate for all people working for us (including temporary staff and volunteers). This policy also indicates how we intend to deal with our donors, funding bodies and cooperation partners, and what we expect from cooperation partners in terms of integrity. Integrity Policy is part of our quality assurance system, which consists of various codes, procedures, and policy documents. Together with the pursuit of effectiveness, efficiency, results and client focus, integrity is one of the main foundations of the quality of the Organisation.

Our Integrity Policy serves the following objectives:

- to encourage the quality of work of the Foundation’s staff and thus of the Foundation’s activities;
- to prevent fraud, corruption, or other abuses within the Organisation and in relation to the transfer of assets to third parties;
- to maintain and reinforce trust among donors, thus promoting the inflow of funds to be spent on the good cause;
- to maintain and reinforce trust among all other stakeholders, thus ensuring public support;
- to protect and reinforce the reputation of the fundraising charity sector.

As the above immediately makes clear, Integrity Policy is something that grows and changes along with the development of our organisation and that therefore needs to be modified or amended from time to time.

Our Integrity Policy comprises the following components:

- the core values of the Organisation;
- facilities and measures to promote integrity within the Organisation and in cooperation with other organisations;
- reporting of any violation of integrity (or the threat or suspicion of such);
- reference to codes of conduct, complaints regulations, and specific policy documents setting out the Organisation’s approach to integrity, and the prevention or penalisation of fraud, corruption, and other abuses.

### 3.2. The Core Values of the Organisation

#### **Unprejudiced**

Employees approach people in a manner that is neither biased nor prejudiced. Employees arrive at a decision on purely objective and well substantiated grounds and do not allow themselves to be hindered by improper or personal motives.

#### **Reliable**

Employees honour or fulfil agreements or commitments.

#### **Careful**

Decisions must be taken with care and the Organisation’s resources must be dealt with carefully.

**Helpful and respectful**

Employees act towards one another, donors, cooperation partners, and the public in a helpful manner and treat others with respect.

**Open**

Superiors and employees call one another to account regarding their attitude and improper behaviour.

**Professional and morally responsible**

Professionalism encompasses the above core values. Professionalism means that the employee performs his/her work properly, displays integrity, and is able to apply the various core values simultaneously. If various values compete for priority, he/she must be able to make a responsible trade-off between them. He/she must also be prepared to account for what he/she does.

**3.3. Fraud, Corruption, and Abuses**

Preventing, identifying, penalising, and combating fraud, corruption, or other abuses within the Organisation is an integral part of the Integrity Policy.

**Within the Organisation**

Our financial and administrative processes are organised according to three guiding principles:

- separation of positions and tasks in order to promote internal control;
- risk management for which financial procedures have been drawn up;
- regulations and procedures laid down in the framework of ISO certification.

Sanctions against violations are governed by the Terms and Conditions of Employment of Aids Fonds – STOP AIDS NOW! – Soa Aids Nederland, the Dutch Civil Code [BW], and/or the Dutch Criminal Code [WvS].

**Outside the Organisation**

Transfers of funds to third parties are governed by the *Policy on Fraud, Corruption and Mismanagement* of 3 November 2015.

**By the Organisation**

Fundraising is subject to the following guiding principles:

- The origin of the funds must be transparent. This must be registered in accordance with the requirements for the CBF Seal of Approval [CBF-Keur] and sponsoring relationships must be reported and explained in the Annual Report;
- Benefits provided in return for sponsorship must be recorded in writing and may not conflict with or influence strategic policy or the current work plan.

**3.4 Facilities and Measures to Promote integrity**

Our organisation actively promotes integrity by taking specific measures, such as internal communication and the provision of facilities, for example by appointing a Confidential Counsellor and a Complaints Committee. For all activities, in the broadest sense of the word, the employer checks whether measures or information are necessary in relation to the Integrity Policy. The Integrity Policy, codes of conduct, and procedures can be found on the intranet on the "human resources service desk" page.

**Active Integrity Policy**

The employer promotes integrity within the Organisation. Each employee receives information about the codes of conduct and is provided with a copy of the Integrity Policy when he/she is taken on. Employees are expected to have taken note of the content of the Integrity Policy and to put it into practice. All employees are also informed of the existence of the internal complaints procedure, and of who the internal and external Confidential Counsellors are. The complaints regulations are published on the intranet and a copy is available to employees on request.

All employees are informed via the usual channels about the policy for preventing and combating inadmissible behaviour at work. The employer ensures that the work atmosphere is such that complaints are actually open to discussion. All employees are made aware by the employer that inadmissible behaviour will not be tolerated and may lead to penalties for anyone who is guilty of such behaviour.

During periodic employee interviews with the superior, integrity issues are addressed with the aim of ensuring awareness of those issues and discussing situations in which employees encounter integrity dilemmas in their daily work.

Employees are encouraged to reflect and, in situations where existing rules provide little or no guidance, to discuss issues with a colleague, superior, or Confidential Counsellor.

The employer and the Works Council have agreed to place the subject on the agenda periodically. The Organisation accounts explicitly for its Integrity Policy in the Annual Report and the Accountability Statement.

### **Reporting on Integrity Policy**

The subject of integrity is periodically placed on the agenda for consultations between the employer and the Works Council. The Organisation accounts explicitly for its Integrity Policy in the Annual Report and the Accountability Statement.

### **Confidential Counsellor**

The Confidential Counsellor is an official appointed by the Executive Board to whom an employee can turn if he/she is reluctant to raise the matter with a colleague or superior. The Confidential Counsellor listens to the employee, sympathetically and confidentially, and can advise on how to deal with an integrity issue. The Confidential Counsellor can also help an employee to raise issues internally regarding integrity, and suspicion of fraud, corruption, or other abuses.

### **Complaints Regulations**

Formal complaints about inadmissible behaviour or an abuse (or suspected abuse) can be submitted to the Executive Board, either directly or via the Works Council. The Executive Board will then set up a Complaints Committee to deal with the complaint. The Complaints Committee will consist of an equal number of representatives of the employer and the employees, at least one of them a woman. Based on the outcome of the investigation by the Complaints Committee, the Executive Board will then adopt a substantive position regarding the matter and will decide on any measures to be taken. The complainant will be informed of the results of the investigation and the measures taken or to be taken.

### **Whistleblower Regulations**

The Foundation's Whistleblower Regulations indicate how an employee/person concerned can report a suspicion of an abuse within the Organisation and the actions that the management and/or the Supervisory Board must take as a result of that report. In addition, the Regulations stipulate how an employee/person concerned who reports an abuse – provided that there is no demonstrable intentional reporting of an unfounded abuse – will be protected.

### **Gifts, invitations and the Christmas tombola**

As with any organisation, our employees receive business-related gifts, invitations, and the like without being asked, directly or indirectly, to provide any benefits in return. Such offers – provided they are proportionate and within the limits of what is generally accepted within society – are regarded as expressing appreciation of a professional relationship. Gifts and invitations are always reported to the Executive Board and as far as possible made available for the annual Christmas tombola,<sup>1</sup> so that all employees have an equal chance of receiving one of the business-related gifts.

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<sup>1</sup> The Christmas tombola is a festive event within the organisation. Among other things, it involves all business-related gifts being raffled off among the employees.

### **3.5 Reporting a Violation of integrity**

Reporting a violation of integrity (or the threat or suspicion of such) is often preceded by a whole procedure. This requires caution on the part of all concerned. It is recommended that the intention to submit a report be discussed with the superior or Confidential Counsellor.

As regards reporting a violation (or suspected violation) of integrity, please refer to the reporting procedure as included in the Whistleblower Regulations.

## 4. Preventive Codes of Conduct

The internal codes of conduct on *Interpersonal Behaviour* and *E-mail and Internet Use* are intended to guide implementation of our Integrity Policy and thus to promote good interpersonal behaviour within the Organisation and prevent inadmissible behaviour.

In addition, our organisation is committed to an external code of conduct drawn up within the fundraising sector to promote integrity and ensure trust on the part of the various stakeholder groups on which the charitable sector so greatly depends. The Organisation as a whole subscribes to the Code of Conduct drawn up by the Cooperating Sectoral Organisations in Philanthropy (SBF), the [Guidelines on Remuneration of Directors of Charities](#), and the Financial Management Guidelines for Charities drawn up by the GDN, which concern financial reserves and [investment](#). The Foundation holds CBF Accreditation, in which the SBF Code of Conduct is incorporated.

Finally, our organisation endorses the external codes of conduct that relate to its objectives and mission, namely *Good Donorship in a Time of AIDS*, *Guidelines on Support to Partners to Manage HIV/AIDS in the Workplace*, and the *Code of Good Practice for NGOs Responding to HIV/AIDS*.

### 4.1. Code of Conduct on Interpersonal Behaviour

*"What are you getting upset about? A few jokes, a bit of teasing between colleagues – it livens up the atmosphere at work."*

That's just one reaction, and the picture that then emerges is that things aren't that bad at all. Of course a bit of a joke now and again isn't a problem, but sometimes it turns into genuinely inadmissible behaviour: outright racism, sexual harassment, or other intimidating behaviour constantly directed at one and the same person.

The perpetrator has more power than the victim in some way. Perhaps he or she is physically stronger, more articulate, holds a higher position, or gets more support from a group. One person often takes the lead and a small group forms, with each member having their own reasons for joining. Inadmissible Behaviour takes many forms, and there's no limit to perpetrators' "creativity".

- **Isolating someone:** For example, never asking someone to contribute or deliberately ignoring them in conversations;
- **Making it unpleasant or impossible for someone to work:** This can range from constantly leaving all the unwashed cups on someone's desk to not passing on important information or phone calls, making the same person do the unpleasant jobs, or making unnecessary criticisms or manipulating someone's performance.
- **Teasing/ridiculing:** For example, someone may be teased or ridiculed because of their appearance, their behaviour, or their way of speaking or walking.
- **Gossiping:** Everyone is the object of gossip occasionally and that need not necessarily be harmful. But it is indeed harmful if the gossip is always about the same person and if it's only their negative sides that are talked about. Gossip then becomes harmful to a person's reputation and amounts to harassment.
- **Threats:** Explicit threats, but also implicit, concealed threats.
- **Physical violence:** This includes repeatedly banging into someone "accidentally" or elbowing them when sitting next to them.
- **Racism:** Racism can include all the various forms of harassment mentioned above, as well as all possible ways of not treating him/her as equal to native Dutch colleagues.
- **Sexual harassment:** Direct or indirect sexually suggestive expressions in words, gestures, images, behaviour, or otherwise which the person concerned comes into contact with in the work situation and which he or she considers unwanted. Sexual harassment can be by persons both within and outside the Organisation. The harassment may also relate to the sexual orientation of the person concerned.

### **And then it happens to you personally...**

Almost always, it's a case of a colleague dealing with you – completely unexpectedly – in a highly exceptional manner. You're then stunned by what's happened and you don't immediately know what to do. And then it happens again, and you get the feeling that you've entered a downward spiral. A lot of employees don't know what to do in such a situation and they try not to think about it, or they try to avoid the person (or persons) concerned. Unlike the perpetrator(s), the victim doesn't know when it's going to happen again. He or she then often spends eight hours a day, every workday, preparing mentally and/or avoiding those people. That's very upsetting, and a lot of victims ultimately call in sick.

### **What can you do if it happens to you?**

- Make clear that you consider the behaviour concerned to be unacceptable. Tell the perpetrator explicitly that he or she is going too far, that you don't like his/her approach, and why not.
- Record when the incident took place, and describe what happened.
- Don't just let things take their course. The longer it continues, the more difficult it becomes to take action.
- Talk to someone you can trust and who will safeguard your privacy, for example a colleague, your superior, or the Organisation's Confidential Counsellor. Investigate what the options are for stopping the inadmissible behaviour. If this doesn't work out, then talk to someone you trust about whether submitting a complaint is justified and what the channels are for doing so.
- But don't involve too many people because that will make things more complicated and it may perhaps become very difficult to function as an equal among your departmental colleagues again.
- Try to find as much distraction as possible outside your work. The work is an important part of your life but only a small part.

### **What you shouldn't do**

- Don't just blame yourself. That won't get you anywhere.
- Stay rational and don't let yourself be led by your emotions too much.
- Don't call in sick stating a different reason but raise the matter within the Organisation.
- And don't just resign abruptly; you can lose your right to benefits by doing so.

### **"I was there and saw it happen"**

- Someone who witnesses inadmissible behaviour, in whatever form, can try to support the victim.
- They can do that actively, for example by tackling the offender(s) about their behaviour. "Don't be so nasty; you wouldn't like it if they dealt with you like that."

Passive support for the victim also helps, for example making it clear non-verbally that you disapprove of bullying by not laughing when the victim is ridiculed. You can walk away when the bullying takes place or you can stand side by side – metaphorically but also literally – with the victim. You can also support the victim by:

- making clear that you do accept him or her and that you object to the bullying behaviour;
- helping him/her find a solution;
- seeking support among colleagues. If a majority of people in the department make clear to the perpetrator that the bullying is not appreciated, then it will stop automatically. That's because he/she will lose more by bullying than he/she gains.

### **Complaints regulations and Confidential Counsellor**

Finally: Inadmissible Behaviour Complaints Regulations have been drawn up for the purpose of dealing carefully with relevant complaints. Perpetrator(s) need to realise that inadmissible behaviour can lead to penalties.

- Confidential Counsellor: The Executive Board has appointed an external Confidential Counsellor, without any other ties to the Organisation, who does not know anyone in the Organisation, and who is able to deal with everyone in an open and independent manner.
- The external Confidential Counsellor is Ella Bohnenn. You can reach her by e-mail ([e.bohnenn@xs4all.nl](mailto:e.bohnenn@xs4all.nl)) or by phone (+31 (0)20 644 9048).

## 4.2. Code of Conduct on E-mail and Internet Use

### Section 1. General Principles

Data that can be traced back to a person will not be registered, collected, monitored, combined or processed, other than as agreed in this protocol.

1.1 Personal data will only be used for the purpose for which it was collected (see [explanation](#))

1.2 Registration of data that can be traced back to a person must be limited to a minimum. The aim is to ensure maximum protection of the privacy of employees in the workplace.

### Section 2. E-mail use

2.1 Employees are entitled to use the e-mail system for non-work-related messaging, so as to receive and send personal e-mail messages both internally and externally, provided that this does not interfere with their day-to-day work.

2.2 The employee's right to receive and send personal e-mails is subject to the following conditions: messages must comply with generally accepted standards of decency (see [explanation](#))

2.3 The employer will not read either personal or work-related e-mail. Similarly, personal data regarding to the number of e-mails, the e-mail addresses, and other data relating thereto will not be registered and/or monitored (see [explanation](#))

2.4 Monitoring may take place on condition that there are compelling reasons to suspect someone of improper use of e-mail as referred to in subsections 2.1 and/or 2.2, whereby the monitoring will be announced in advance within the workplace and to the Works Council, and first reported to the Dutch Data Protection Authority [*College Bescherming Persoonsgegevens, CBP*] (see [explanation](#))

### Section 3. Internet use

3.1 Employees are entitled to use the internal and external Internet system and social media for non-work-related purposes, provided that this does not interfere with their day-to-day work.

3.2 The employer will not register and/or monitor any personal data regarding Internet use, such as time spent online and sites visited (see [explanation](#))

3.3 Monitoring may take place on condition that there are compelling reasons to suspect someone of improper use of the Internet as referred to in subsections 3.1 and/or 3.2, whereby the monitoring will be announced in advance within the workplace and to the Works Council, and first reported to the Dutch Data Protection Authority (see [explanation](#))

### Section 4. Rights of Employees (see explanation)

#### 4.1 Right of inspection

Employees have the right to inspect the data recorded about them. Requests for such inspection will be granted within four weeks.

#### 4.2 Right to a copy

Employees have the right to receive a copy of the data recorded about them within four weeks.

#### 4.3 Right of correction

Employees have the right to correct or add to factually incorrect data recorded about them, or to have it corrected or added to. A decision on requests for correction or addition will be taken within four weeks. If a request for correction and/or addition is granted, the correction or addition will be carried out immediately.

#### 4.4 Right to deletion

Employees have the right to remove or delete any data recorded about them that is not relevant (or no longer relevant) or that is in violation of this protocol or a statutory provision. A decision on requests for removal or deletion will be taken within four weeks. If the request is granted, removal and deletion will be carried out immediately.

### **Section 5. Complaints procedure**

5.1 If an employee believes that his/her rights have been harmed under this protocol, he/she may contact the Executive Board or the Works Council. Depending on the nature and seriousness of the complaint, the Executive Board will deal with the complaint in accordance with the Employee Complaints Procedure (Section 5, 5.1) or will appoint a Complaints Committee (Section 5, 5.2).

### **Explanations**

Explanation of Section 1.1 Data is "personal data" if the identity of the person to whom it relates can reasonably be established. The fact that the name of the person concerned is not linked to the data does not always matter. An employee can be traced, for example, by means of his/her employee number or a login name. Aggregated data on the whole workforce or a department of reasonable size is not covered by this protocol.

Explanation of Sections 2.2 and 3.2 Personal use of the Internet and e-mail may be made subject to certain conditions. The list of such conditions may be reduced or added to in consultation between the director and the Works Council.

Explanation of Sections 2.4 and 3.3 In the case of monitoring, there must be a reasonable suspicion or presumption of a criminal offence or unauthorised act in respect of one or more employees that justifies such monitoring. Other measures must have been exhausted and a major interest of the Organisation must be at stake. People within the Organisation must be aware that in exceptional situations computer use may be monitored and must know what behaviour is not tolerated.

Explanation of Section 4 These rights derive from the Dutch Personal Data Protection Act.

[*Wet bescherming persoonsgegevens*]. As of 25 May 2018, these rights derive from the EU's

**General Data Protection Regulation (GDPR)**, i.e. the privacy legislation applying to all Member States of the European Union.

## 5. Confidential Counsellors and Complaints Committees

### 5.1. Confidential Counsellor

#### Who is the Confidential Counsellor?

The Executive Board has appointed an external Confidential Counsellor, without any other ties to the Organisation, who does not know anyone in the Organisation, and who is able to deal with everyone in an open and independent manner.

The external Confidential Counsellor is Ella Bohnenn. You can reach her by e-mail (e.bohnenn@xs4all.nl;) or by phone (+31 (0)20 644 9048).

#### What is the position of the Confidential Counsellor?

The Confidential Counsellor works on the instructions of the Executive Board but is not an employee of the Organisation. The Confidential Counsellor is known to employees via information available on the intranet about his/her role and accessibility, his/her attendance at meetings of employees, and via the introduction for new employees. He/she can be reached by phone and e-mail. Meetings with the Confidential Counsellor take place on neutral terrain, outside the Organisation. The Confidential Counsellor is accountable only to the Executive Board, without being obliged to name any employees who call upon him/her or disclose the content of their consultations with him/her.

#### What is a Confidential Counsellor?

The Confidential Counsellor is the point of contact for employees who have problems or conflicts, or who are the victim of an abuse (or suspected abuse) or undesirable behaviour such as sexual harassment, bullying, baiting, aggression, violence, or discrimination. The Confidential Counsellor is basically there for any employee who has to deal with such issues. The Confidential Counsellor is also the point of contact for employees who are involved in a conflict in their employment relationship which has not been resolved via the regular channels.

The Confidential Counsellor adopts an independent stance, has good communication skills, provides advice (both solicited and unsolicited), and is able to deal with confidential information.

#### What does the Confidential Counsellor do?

At an employee's request, the Confidential Counsellor confidentially advises and/or assists in dealing with problems, conflicts, abuses (or suspected abuses), or undesirable behaviour. The Confidential Counsellor does this by listening, analysing the complaint, providing advice, making contacts, and perhaps bringing up the matter for discussion (or bringing it up again) in order to contribute to the solution.

The Confidential Counsellor does not replace existing procedures and lines of consultation. When a problem is reported to the Confidential Counsellor, he/she first checks whether the employee him/herself can raise the matter with the responsible colleague or superior. If that is the case, the Confidential Counsellor will adopt a reserved stance.

#### Working method for Confidential Counsellor

The Confidential Counsellor will investigate the problem and determine who or which body/bodies can best deal with it. He/she will then advise the complainant as to what to do.

The Confidential Counsellor's involvement can take three forms:

1. He/she can provide advice, after which the complainant attempts to resolve the problem without further involvement on the part of the Confidential Counsellor;
2. He/she can submit the problem to a person or body who/that can deal with it further, with the Confidential Counsellor making the initial contact between the person or body in question and the complainant.

3. The Confidential Counsellor can support the employee in submitting a written complaint in accordance with Section 6.2 of the Inadmissible Behaviour Complaints Regulations.

Section 6.2 (3) explains the task of the Confidential Counsellor in this respect in greater detail. Whichever approach is chosen, the Confidential Counsellor will always determine what his/her involvement is to be in consultation with and with the consent of the employee/complainant and any other responsible persons within the Organisation.

## **5.2. Complaints Committee**

1. The complaint by an employee or person concerned can be submitted to the employer.
2. Following receipt of a complaint from an employee or person concerned, the Executive Board will set up a Complaints Committee and appoint its members for the duration of the procedure.
3. The size of the Complaints Committee will be determined by the Executive Board and the Works Council, but will consist of at least two people. The Complaints Committee will consist of an equal number of representatives of the employer and the employees, at least one of them a woman. The representatives of the employees will be appointed by the Works Council.
4. Meetings of the Complaints Committee will take place behind closed doors. A written report will be drawn up of each meeting and signed for approval by all those involved. If one of the persons involved refuses to sign the report, the reasons why he/she has not done so will be noted in the report.
5. Both at the start of the procedure and during the term of the investigation, the employer – at the request of and after consultation with the Complaints Committee – may implement temporary measures if that is necessary for the wellbeing of the complainant or if the situation is untenable for one or more of the persons directly involved.
6. The Complaints Committee will issue a written statement to the employer within four weeks after the complaint is submitted. That four-week period may be extended by no more than two weeks. The Committee's statement will in any case contain a ruling on the following points:
  - whether the complaint is plausible and if so to what extent;
  - who is/are affected by the inadmissible behaviour;
  - advice to the employer on the measures to be taken.
7. A member of the Complaints Committee is entitled to add a minority opinion to the Committee's statement. A copy of the statement will be sent to the persons directly involved as well as to the Confidential Counsellor.
8. Depending on the seriousness of the complaint, the employer may impose penalties on the person against whom the complaint is directed, including the following: a written reprimand, suspension, compensation, transfer, dismissal.
9. Within one week of receiving the Complaints Committee's statement, the Executive Board will then adopt a written decision on any measures to be taken. No measures will be taken that are disadvantageous to the complainant. If the employer takes a decision that does not involve sanctions although the complaint has been declared well-founded by the Complaints Committee, or if the Committee has proposed measures that are not adopted by the employer, this must be explicitly stated in the employer's decision, with the reasons being stated. A copy of the statement will be sent to the persons directly involved and also to the Confidential Counsellor if the latter has been involved in dealing with the complaint.
10. In the context of this procedure, the Confidential Counsellor, the Complaints Committee, and other parties involved must act in such a way as to adequately safeguard the privacy of the complainant and other parties involved.

### **Appeal**

1. A written appeal may be lodged within two weeks of the employer's written decision.

2. An appeal by the employee can be lodged directly with the employer or with the employer via the Works Council.
3. The appeal will be forwarded to the Complaints Committee immediately so that it can advise the employer.
4. The Complaints Committee will hear both parties separately. Meetings of the Complaints Committee will take place behind closed doors. A written report will be drawn up of each meeting and signed for approval by all those involved. If a person involved refuses to sign the report, the reasons why he/she has not done so will be noted in the report.
5. The Complaints Committee will issue a written recommendation to the employer, giving its reasons, within two weeks after the appeal is submitted. That two-week period may be extended by no more than two weeks.
6. The employer will take a decision within one week of the Complaints Committee issuing its recommendation on the appeal, taking into account what is stated in that recommendation. If the employer deviates from the recommendation made by the Complaints Committee, its decision must be accompanied by the reasons for doing so.

**Confidentiality**

All those involved must should treat the information that is brought to their attention as confidential. This confidentiality obligation does not apply to the recommendation of the Complaints Committee and the final decision of the employer, unless the employee indicates in writing that he wishes to maintain confidentiality in this respect as well.

## 6. Corrective Procedures

Even if codes of conduct are in place, friction and/or complaints may sometimes still arise when people work alongside one another and cooperate. That is not in itself a cause for concern and can be resolved harmoniously by means of a serious talk between the people involved. Having a serious talk may also be the solution in the event of an occasional case of improper behaviour. If that is not possible, or if a violation of integrity is concerned – such as inadmissible behaviour, fraud, or corruption – then other measures are required.

Our organisation has three corrective procedures in place: a general one directed at employee complaints and two specific ones directed at inadmissible behaviour and violations of integrity:

- Employee Complaints Regulations;
- Inadmissible Behaviour Complaints Regulations;
- Whistleblower Regulations

### 6.1 Employee Complaints Regulations

This complaints procedure is mainly intended for complaints about the internal organisation and about working together. It may, for example, concern the application of the terms and conditions of employment, personnel policy instruments, regulations, being heard, information, and communication.

#### **What to do – specifically – if you have a complaint:**

First of all, you should discuss your complaint with the person concerned. If for any reason you don't think that's enough and you're looking for an alternative, then there are other options.

- You should basically then discuss it with your superior, who will decide what he/she will do about it.
- If the complaint is in fact about your superior, however, you should first approach his/her own superior. For example: if your superior is a programme coordinator then you can approach his/her manager, if he/she is a manager then you should go to a director. If your complaint is about a director, you should go to the other director.
- An alternative is to discuss the complaint with a member of the human resources department. He/she will then decide who to discuss it with.
- You can also discuss the complaint and how to deal with it with the Confidential Counsellor. The Organisation has an external Confidential Counsellor, Ms Ella Bohnenn. More information about the work, working method, and accessibility of the Confidential Counsellor is given in Section 5, 5.1.

If you feel that something is wrong in organisational terms, you can approach the Works Council. In really extreme cases where you feel that the Executive Board is not taking your complaint seriously, you can take the matter to the Supervisory Board. In the latter case, however, it is advisable to first consult people within the Organisation who you trust.

In any case, it is important for criticism to be expressed so that we can learn from it. It's also important that the Organisation guarantees that complaints will be dealt with properly. As the Executive Board, we also want to be able to offer that guarantee.

### 6.2 Inadmissible Behaviour Complaints Regulations

These regulations will take effect if normal attempts to mediate between the complainant and the perpetrator(s) fail to resolve the problem.

#### **Section 1. General**

- 1.1. The purpose of these complaints regulations is to give the individual employee a means of putting an end to a situation that he/she finds undesirable with regard to sexual harassment, bullying, baiting, aggression, violence, racism, discrimination, or any other form of inadmissible behaviour. The intention is also to prevent arbitrariness and/or negligence as regards dealing with such issues within the Organisation.
- 1.2. The employer and the Works Council consider inadmissible behaviour to be unacceptable and have agreed that specific measures will be taken within the Organisation to prevent and, if necessary, combat such behaviour.
- 1.3. The employer can be expected to take reasonable steps to organise the work organisation and working environment in such a way that any form of inadmissible behaviour is prevented.

## **Article 2 Definition of terms**

(See the list of terms on pages 4–5.)

### **Section 3. Confidential Counsellor**

The Confidential Counsellor designated by the employer will be charged with the initial intake of a person who has been the object of inadmissible behaviour and who wishes to talk about it.

The Confidential Counsellor's duties are:

- 3.1. to act as the contact for the employee who has a complaint about inadmissible behaviour, and to assist, guide, and advise them;
- 3.2. to determine, through investigation and consultation with the person(s) concerned, whether a solution can be found informally or through mediation;
- 3.3. if the employee so desires, to support him/her in filing a complaint with the Organisation's own Complaints Committee and/or also, if a criminal offence (assault/indecent assault, rape) is concerned, in filing an official report with the police;
- 3.4. The Confidential Counsellor will not undertake any action in the performance of his/her duties without the consent of the employee who has submitted the complaint;
- 3.5. If necessary, the Confidential Counsellor can refer to (assistance) bodies and can support the employee in calling in these bodies;
- 3.6. The Confidential Counsellor will report to the Executive Board on the implementation of this procedure and his/her role in it;
- 3.7. The employer must provide the Confidential Counsellor with the necessary facilities to enable him/her to be consulted confidentially in writing, orally, or by phone. The activities of the Confidential Counsellor take place during working hours;
- 3.8. In the performance of his/her duties, the Confidential Counsellor is accountable exclusively to the Executive Board, while respecting the confidentiality of information;
- 3.9. The Confidential Counsellor reports annually to the Executive Board on the number of complaints dealt with and, in general terms, on the nature of those complaints;
- 3.10. The Confidential Counsellor advises the Executive Board on any abuses, trends, or developments that have been observed;
- 3.11. For the duration of the complaints procedure, the Confidential Counsellor enjoys the same legal protection as members of the Works Council as referred to in Section 21 of the Works Councils Act.

### **Section 4. Complaints procedure**

- 4.1. A complaint about inadmissible behaviour will be submitted in writing by the employee who has been the object of it and/or who has been negatively affected by it.
- 4.2. Following receipt of a complaint from an employee, the Executive Board will set up a Complaints Committee and appoint its members for the duration of the procedure.
- 4.3. The size of the Complaints Committee will be determined by the Executive Board and the Works Council, but will consist of at least two people. The Complaints Committee will consist

- of an equal number of representatives of the employer and the employees, at least one of them a woman. The representatives of the employees will be appointed by the Works Council.
- 4.4. Both the person submitting a complaint and the person complained about will receive a copy of the present complaints regulations. The submission of a complaint will not in itself have any negative effect on the current or future position of the complainant. The Complaints Committee will not deal with anonymous complaints.
  - 4.5. The Complaints Committee will carry out an investigation of every complaint submitted to it regarding inadmissible behaviour. The Complaints Committee is entitled to receive all information from the employer's side that it requires in order to carry out its duties. Within two weeks after receiving the complaint, the Complaints Committee will interview, separately, the employee who submitted the complaint and other parties involved. At his/her request, the employee submitting the complaint can be assisted by the Confidential Counsellor or a person from outside the Organisation. The Complaints Committee can also interview other persons. If necessary, the Complaints Committee may decide to have an investigation carried out by experts. The cost of such investigation will be borne by the employer.
  - 4.6. Meetings of the Complaints Committee will take place behind closed doors. A written report will be drawn up of each meeting and signed for approval by all those involved. If a person involved refuses to sign the report, the reasons why he/she has not done so will be noted in the report.
  - 4.7. Both at the start of the procedure and during the term of the investigation, the employer – at the request of and after consultation with the Complaints Committee – may implement temporary measures if that is necessary for the wellbeing of the complainant or if the situation is untenable for one or more of the persons directly involved.
  - 4.8. The Complaints Committee will issue a written statement to the employer within four weeks after the complaint is submitted. That four-week period may be extended by no more than two weeks. The Committee's statement will in any case contain a ruling on the following points:
    - whether the complaint is plausible and if so to what extent;
    - who is/are affected by the inadmissible behaviour;
    - advice to the employer on the measures to be taken.
  - 4.9. A member of the Complaints Committee is entitled to add a minority opinion to the Committee's statement. A copy of the statement will be sent to the persons directly involved as well as to the Confidential Counsellor.
  - 4.10. Depending on the seriousness of the complaint, the employer may impose penalties on the person against whom the complaint is directed, including the following: a written reprimand, suspension, compensation, transfer, dismissal.
  - 4.11. Within one week of receiving the Complaints Committee's statement, the Executive Board will then adopt a written decision on any measures to be taken. No measures will be taken that are disadvantageous to the complainant. If the employer takes a decision that does not involve sanctions although the complaint has been declared well-founded by the Complaints Committee, or if the Committee has proposed measures that are not adopted by the employer, this must be explicitly stated in the employer's decision, with the reasons being stated. A copy of the statement will be sent to the persons directly involved and also to the Confidential Counsellor if the latter has been involved in dealing with the complaint.
  - 4.12. In the course of this procedure, the Confidential Counsellor, the Complaints Committee, and other parties involved must act in such a way that the privacy of the complainant and other parties involved is properly safeguarded.

## **Section 5. Appeal**

- 5.1. A written appeal may be lodged with the employer within two weeks of the latter's written decision.

- 5.2. The appeal will be forwarded to the Complaints Committee immediately so that it can advise the employer.
- 5.3. The Complaints Committee will hear both parties separately. Meetings of the Complaints Committee will take place behind closed doors. A written report will be drawn up of each meeting and signed for approval by all those involved. If a person involved refuses to sign the report, the reasons why he/she has not done so will be noted in the report.
- 5.4. The Complaints Committee will issue a written recommendation to the employer, giving its reasons, within two weeks after the appeal is submitted. That two-week period may be extended by no more than two weeks.
- 5.5. The employer will take a decision within one week of the Complaints Committee giving its recommendation on the appeal, taking into account what is stated in that recommendation. If the Executive Board decision deviates from the recommendation made by the Complaints Committee, the decision must be accompanied by the reasons.

### **Section 6. Confidentiality**

All those involved must treat the information that is brought to their attention as confidential. This confidentiality obligation does not apply to the recommendation of the Complaints Committee and the final decision of the employer, unless the employee indicates in writing that he wishes to maintain confidentiality in this respect as well.

## **6.3. Whistleblower Regulations**

### **Section 1. Definition of terms**

(See the list of terms on pages 4–5.)

### **Section 2. Scope of these Regulations**

- 2.1. These regulations apply to the reporting by a person of a violation of integrity or a suspicion of an abuse as described in the list of terms;
- 2.2. These regulations do not apply to:
  - a. reporting personal complaints by the person concerned regarding personal matters relating to the work;
  - b. reporting conscientious objections in connection with the conduct of normal business activities; or
  - c. the expression of criticism of policy decisions made by the employer.

### **Article 3. Reporting procedure**

- 3.1. Unless there is a situation as referred to in Section 5 or Section 8, the person concerned will report a suspicion of an abuse to his/her superior or, if he/she does not consider that desirable, to the Confidential Counsellor. He/she can also report the matter to both the Confidential Counsellor and his/her superior.
- 3.2. The person concerned may request the superior or Confidential Counsellor not to disclose his/her identity to the Executive Board.
- 3.3. The person to whom a suspicion of an abuse has been reported will record the report in writing, together with the date on which it was received, and will have the record signed for approval by the person concerned, who will receive a copy.
- 3.4. A person who has made use of the option in Section 3(2) for his/her identity not to be disclosed to the Executive Board may withdraw that request at any time. If the person's identity is not disclosed, the written record of the report as referred to in Section 3(3) will be submitted for approval. The person who drew up the report will state the date on which the person concerned agreed to that being done. The acknowledgement of receipt as referred to in Section 3(6) and the Position Statement as referred to in Section 4(1) and (2) will be sent

to the person to whom the person concerned has reported the suspicion of an abuse. That person will then notify the person concerned.

- 3.5. The superior or Confidential Counsellor referred to in the first subsection will personally ensure that the Chair of the Executive Board is notified – by means of the written statement (signed or approved by the person concerned) – of the reported suspicion of an abuse and the date when the report was received. If the person concerned does not wish his/her identity to be disclosed, pursuant to Section 3.2, the notification must be made without the person concerned signing it.
- 3.6. The Chair of the Executive Board will send an acknowledgement of receipt to the person who has reported a suspicion of an abuse, stating the reported suspicion and the date of receipt.
- 3.7. The Executive Board will immediately instigate an investigation as a result of a report of a suspected abuse.
- 3.8. The person concerned and the person to whom the suspicion of an abuse has been reported will treat the report confidentially. No information may be provided to third parties, inside or outside the Foundation, without the consent of the Chair of the Executive Board. When information is provided, the name of the person concerned will, as far as reasonably possible, not be mentioned and the information will also be provided in such a way that the anonymity of the person concerned is safeguarded as far as possible.

#### **Section 4. Position Statement by Executive Board**

- 4.1. Within a period of eight weeks from the moment of the internal report, the person concerned will be informed in writing by or on behalf of the Chair of the Executive Board of the Executive Board's substantive position regarding the reported suspicion of an abuse, together with an indication of the steps to which the report has led.
- 4.2. If the Position Statement cannot be provided within eight weeks, the person concerned will be notified of this by or on behalf of the Chair of the Executive Board and informed of the period within which he/she can expect a Position Statement.
- 4.3. If, in view of the circumstances, the period referred to in Section 4(2) is unreasonably long, the person concerned may lodge an objection with the Chair of the Executive Board.

#### **Section 5. Report to Supervisory Board**

- 5.1. The person concerned will report the suspicion of an abuse to the Chair of the Supervisory Board if:
  - a. he/she disagrees with the Position Statement referred to in Section 4;
  - b. he/she has not received a Position Statement within the required period as referred to in Section 4(1) and (2);
  - c. the period referred to in the second subsection of Section 4, in view of all the circumstances, is unreasonably long and the employee has submitted an objection to this to the Chair of the Executive Board, with that objection having been rejected;
  - d. there has been a previous report of essentially the same abuse, in accordance with these Regulations, which has not eliminated the abuse;
  - e. the suspicion of an abuse concerns a member of the Executive Board.
- 5.2. The report must be submitted in writing, supported by reasons, to the Chair of the Supervisory Board.
- 5.3. The Chair of the Supervisory Board will confirm receipt of a report of suspected abuse to the person concerned and will inform the Executive Board of the report.
- 5.4. The Supervisory Board will immediately start an investigation in the light of the report of a suspicion of an abuse.
- 5.5. The person concerned and the person to whom the suspicion of an abuse has been reported will treat the report confidentially. No information may be provided to third parties, inside or outside the Foundation, without the consent of the Chair of the Supervisory Board. When information is provided, the name of the person concerned will, as far as reasonably possible,

not be mentioned and the information will also be provided in such a way that the anonymity of the person concerned is safeguarded as far as possible.

### **Section 6. Position Statement by Supervisory Board**

- 6.1. Within a period of eight weeks from the moment of the report, the person concerned will be informed in writing by or on behalf of the Chair of the Supervisory Board of the substantive position regarding the reported suspicion of an abuse.
- 6.2. If the Position Statement cannot be provided within eight weeks, the person concerned will be notified of this by or on behalf of the Chair of the Supervisory Board and informed of the period within which he/she can expect a Position Statement.

### **Section 7. Consultation**

- 7.1. Before reporting a suspected abuse, the person concerned may discuss his/her suspicion with an adviser in order to seek advice.
- 7.2. Any person who enjoys the trust of the person concerned and is bound by an obligation of confidentiality may act as an adviser. This means a person acting as an adviser who, by virtue of his/her position, is subject to an obligation of confidentiality, such as a lawyer, trade union legal assistance provider, or an occupational health physician [*bedrijfsarts*].

### **Section 8. Report to External Third Party**

- 8.1. The person concerned can report a suspicion of an abuse to an external third party, with due observance of the provisions of the present section, if one of the following grounds for exception applies:
  - a. an imminent danger, whereby a serious and urgent public interest makes external reporting necessary;
  - b. a situation in which the person concerned can reasonably fear countermeasures as a result of an internal report;
  - c. a clear threat of concealment or destruction of evidence;
  - d. a previous internal report of essentially the same abuse, in accordance with these Regulations, which has not eliminated the abuse;
  - e. there is a statutory obligation to report the suspicion of an abuse.
- 8.2. An external third party within the meaning of these regulations is any organisation or representative of an organisation, not being the Confidential Counsellor or an adviser, to whom the person concerned reports a suspicion of an abuse, because in his/her reasonable opinion this is of such public importance that, in the specific circumstances of the case, that interest must take precedence over the employer's interest in maintaining confidentiality, and who/which, in his/her reasonable opinion, may be considered capable of directly or indirectly remedying the suspected abuse or causing it to be remedied.
- 8.3. With due observance of the provisions of subsection 5, the person concerned may report a suspicion of an abuse to an external third party as referred to in the previous subsection if one of the cases referred to in Section 8(1)(a) to (e) is involved.
- 8.4. The report will be made to an external third party who/which, in the reasonable opinion of the person concerned, is the most appropriate in view of the circumstances of the case, whereby the person concerned will take into account, on the one hand, the effectiveness with which that third party can intervene and, on the other, the employer's interest in the least possible loss/harm being sustained as a result of the intervention, in so far as the loss/harm does not result, of necessity, from the action taken against the abuse.
- 8.5. The more the possibility of loss/harm being sustained by the Foundation increases as a result of the report to an external third party, the greater must be the suspicion of an abuse on the part of the person reports it to an external third party.

**Section 9. Legal protection**

- 9.1. The Foundation guarantees that a person , in accordance with these regulations, reports a suspicion of an abuse in good faith, will not be disadvantaged in any way in his/her position as a result of making the report.
- 9.2. The Foundation guarantees that the Confidential Counsellor, the superior, and the adviser, as referred to in Section 1, will not be disadvantaged in any way as a result of acting as such within the context of these regulations.
- 9.3. The Foundation will take disciplinary sanctions or sanctions regarding terms and conditions of employment against anyone who, contrary to subsections 1 and 2, is responsible for actions against the person concerned, the Confidential Counsellor, the superior or the adviser, as a result of which their position is disadvantaged.
- 9.4. The provisions of subsections 1 to 3 will not apply if the person concerned demonstrably and intentionally submits an unfounded report.

## 1. Appendix: List of regulations and codes of conduct

### **The Foundation has the following:**

- Terms and Conditions of Employment of Stichting Aids Fonds – STOP AIDS NOW! – Soa Aids Nederland
- Diversity Policy, Volunteers Policy, and Stakeholders Policy
- Integrity Policy, including:
  - Employee Complaints Procedure
  - Code of Conduct on Interpersonal Behaviour, including Improper Behaviour Complaints Regulations
  - Code of Conduct on E-mail and Internet Use
  - Whistleblower Regulations
  - External Confidential Counsellor
- Financial Procedures Handbook
- Aidsfonds Investment Procedure
- General Conditions for Financial Contributions/Term and Conditions Grants
- Corporate Partnership Guidelines
- Policy on Fraud, Corruption and Mismanagement
- Fraud protocol
- Child Safeguarding Code of Conduct
- Complaints Handling Procedure
- Appeals procedure with an independent appeals committee with regard to financial contributions from Aidsfonds. Each management decision is subject to the appeal procedure.
- Objection procedure Individual Assistance Aidsfonds

### **The Foundation endorses:**

- Good Governance Code of Conduct drawn up by the Cooperating Sectoral Organisations in Philanthropy (SBF);
- Partos Code of Conduct;
- Good Donorship in a time of AIDS, Guidelines on Support to Partners to manage HIV/AIDS in the Workplace;
- Code of Good Practice for NGOs Responding to HIV/AIDS;
- Guidelines on Remuneration of Directors of Charities;
- Financial Management Guidelines for Charities.

### **The Foundation and ISO-9001 Partos**

The Foundation received ISO-9001 Partos certification in November 2011. This ISO certification is renewed every two years after an external audit.