

## **Integrity code**

The board of the Haagsche Schoolvereniging Foundation decides - in view of obligatory provision 1h of the Code Good Governance PO 2021 - to adopt the integrity code below.

### **Article 1 Definitions**

Code:	The <b>integrity code</b> adopted for the organisation by the board;
board:	The body of the organisation that exercises the administrative tasks and powers;
Employees:	The persons employed by the organisation or who are employed by the organisation;
supervisory board:	The body of the organisation that exercises internal supervision;
Statutes:	The statutes of the organisation;
Act:	The Primary Education Act

### **Article 2 Scope of application of the integrity code**

The code applies to the employees, the management and the supervisory board of the organisation.

### **Article 3 Adoption and amendment of the code**

#### Paragraph 1

The board adopts the code. Before adopting or amending the code, the board will give the supervisory board and the GMR the opportunity to advise on the intended adoption or amendment.

#### Paragraph 2

The board will evaluate the operation of the code at least once every four years and decide - with due observance of the provisions of the first paragraph of this Article - to amend the code if necessary.

#### Paragraph 3

The board will ensure that the code is made public and that it is accessible to employees, parents and other interested parties outside the organisation.

### **Article 4 Explanation and application of the code**

The board decides in those situations not provided for in the code, the text of the code that gives rise to a difference in interpretation or that the application of the code leads to manifest unfairness.

## **Article 5 Core values of integrity**

Within the organisation, the following core values apply as guidelines for acting with integrity and for internal and external conduct:

### *1. Openness*

Openness means that employees, the management and the supervisory board are open to other people's opinions and new experiences. They are open about their business. They are transparent and open to others.

### *2. Reliability*

Employees, the management and the supervisory board are honest, meet their commitments and must be able to count on each other. They use the knowledge and information at their disposal on the basis of their position and function only for the purpose for which that knowledge and information was acquired or provided.

### *3. Respect*

Employees, the management board and the supervisory board respect the dignity of all those involved in the organisation. They respect the convictions, opinions and actions of others, insofar as they do not cause harm to third parties.

## **Article 6 Prevention of conflicts of interest**

### Paragraph 1

Employees of the organisation

- a. notify the board of their financial or other interests in organisations, institutions and companies with which the organisation has business relations;
- b. avoid - in the case of a business relationship as referred to under a - favouritism or the appearance of favouritism in the case of cooperation with organisations, institutions and companies;
- c. refrain from being involved in the decision-making process concerning orders from providers of services to the organisation if those employees have family or personal relationships with those providers.

### Paragraph 2

The provisions in the first paragraph of this article apply by analogy to the executive board and the members of the supervisory board, taking into account what is arranged for these members with regard to preventing conflicts of interest in the law, the articles of association and the regulations of the organisation.

## **Article 7 Accepting gifts and gratuities**

### Paragraph 1

Gifts and gratuities received by staff members, the executive board and members of the supervisory board in connection with their duties shall be reported and registered and are the property of the organisation.

### Paragraph 2

Notwithstanding the provisions of the first paragraph of this article, employees, the board and the members of the supervisory board may retain gifts or gifts that represent a value of less than €50. The receipt of a gift with a value of more than €50 will be notified to the manager by email. On the occasion the children give the staff a joint gift that represents a value of more than €50, this may be retained.

### Paragraph 3

Employees, the management board and the members of the supervisory board will always refuse a gift or gratuity if there is a matter of consultation or negotiation with the giver.

## **Article 8 Ancillary positions**

### Paragraph 1

Employees shall report to their manager all ancillary positions the exercise of which is or may be in conflict with the interests of the organisation.

### Paragraph 2

In principle, employees will not assume any paid or unpaid ancillary positions the exercise of which conflicts or may conflict with the interests of the organisation, unless the manager determines that the exercise of the ancillary position in question in a specific situation will not result in a conflict of interest or harm the organisation.

### Paragraph 3

The provisions in the first paragraph of this Article apply accordingly to the Executive board and the members of the supervisory board, taking into account what is regulated for these members in the law, the articles of association and the organisation's regulations with regard to the exercise of secondary functions.

## **Article 9 Travel, excursions and events**

### Paragraph 1

Taking excursions and attending events at the invitation of third parties is only permitted if - at the discretion of the manager - there is a concrete interest for the organisation.

### Paragraph 2

An employee may only go on a business trip abroad after the board or a director has given permission. A request for permission must include information about the purpose of the trip, the importance for the organisation and the costs.

### Paragraph 3

If the board or a member of the supervisory board wishes to travel abroad on business, the provisions of paragraph 2 of this Article apply by analogy. The supervisory board shall decide on the request.

## **Article 10 Use of the foundation's facilities**

### Paragraph 1

With a view to the importance of the work to be performed, the Executive board may make the following facilities available to employees on the basis of a loan agreement:

- a. a mobile telephone;
- b. a laptop/Chromebook or iPad.

### Paragraph 2

Employees must use the facilities referred to in the first paragraph of this article in accordance with the regulations that form part of the loan agreement.

### Paragraph 3

The board may only monitor the use of the facilities referred to in the first paragraph of this article if there is a suspicion of misuse or a breach of the Code.

### Paragraph 4

The provisions in this article apply by analogy to the board, taking into account what has been agreed with the supervisory board for these members with respect to the use of facilities.

## **Article 11 Reporting (suspected) abuses**

Employees shall not report suspected misconduct within the organisation to the press or to third parties outside the organisation. In the event of suspected irregularities within the organisation, the employees will make use of the applicable complaints procedure or whistleblower procedure.

## **Explanation of some articles**

### *Article 3 Adoption and amendment of the code*

The board adopts the code. In view of the principle that the code applies to all those involved, it is reasonable to give both the GMR and the supervisory board the opportunity to advise on the integrity code to be adopted.

It is possible that the existing statutes and regulations of the organisation already provide for more extensive powers for the supervisory board and the GMR with regard to the adoption of the integrity code. If that is the case, Article 3 must be adjusted accordingly.

### *Article 4 Explanation and application of the code*

The integrity code contains rules that relate to the conduct of those involved, forms of behaviour and the culture of the organisation. Given that nature, it is quite possible that questions arise in practice as to whether or not a certain behaviour is in keeping with the code. Not everything can be set down in detail in rules. This article places the responsibility for testing conduct against the code primarily on the management board. If certain questions of interpretation regularly arise in practice, this can be a reason for the management board to amend the code.

If the behaviour of members of the management board is the subject of discussion, it is logical that the supervisory board - in view of its role as employer and internal supervisor - should carry out the test and, if necessary, take corrective action.

#### *Article 5 Core values of integrity*

This article contains a list and description of several core values that give further substance to the concept of integrity.

#### *Article 7 Acceptance of gifts and gratuities*

This article is based on the principle that gifts and gratuities received by the persons involved as a result of their position are transferred to the organisation. In deviation from this line, it can be decided that the people involved may keep small gifts and gratuities for themselves. It is transparent to determine a limit amount for this and to record it in the code.

#### *Article 10 Use of the foundation's facilities*

The first paragraph of this article lists a number of facilities that may be provided to employees for their use. It is recommended that a user agreement be concluded for each facility and that specific agreements on the use of the facility be laid down. This promotes transparency.

#### *Article 11 Reporting (suspected) abuses*

If an employee experiences a situation within the organisation as undesirable or as an abuse, there must be possibilities to raise this internally. It is not desirable that an employee does not immediately speak out if there is a complaint or suspicion of wrongdoing. Depending on the nature and gravity of the complaint or abuse, the person concerned can make use of the organisation's complaints procedure or whistleblower procedure.