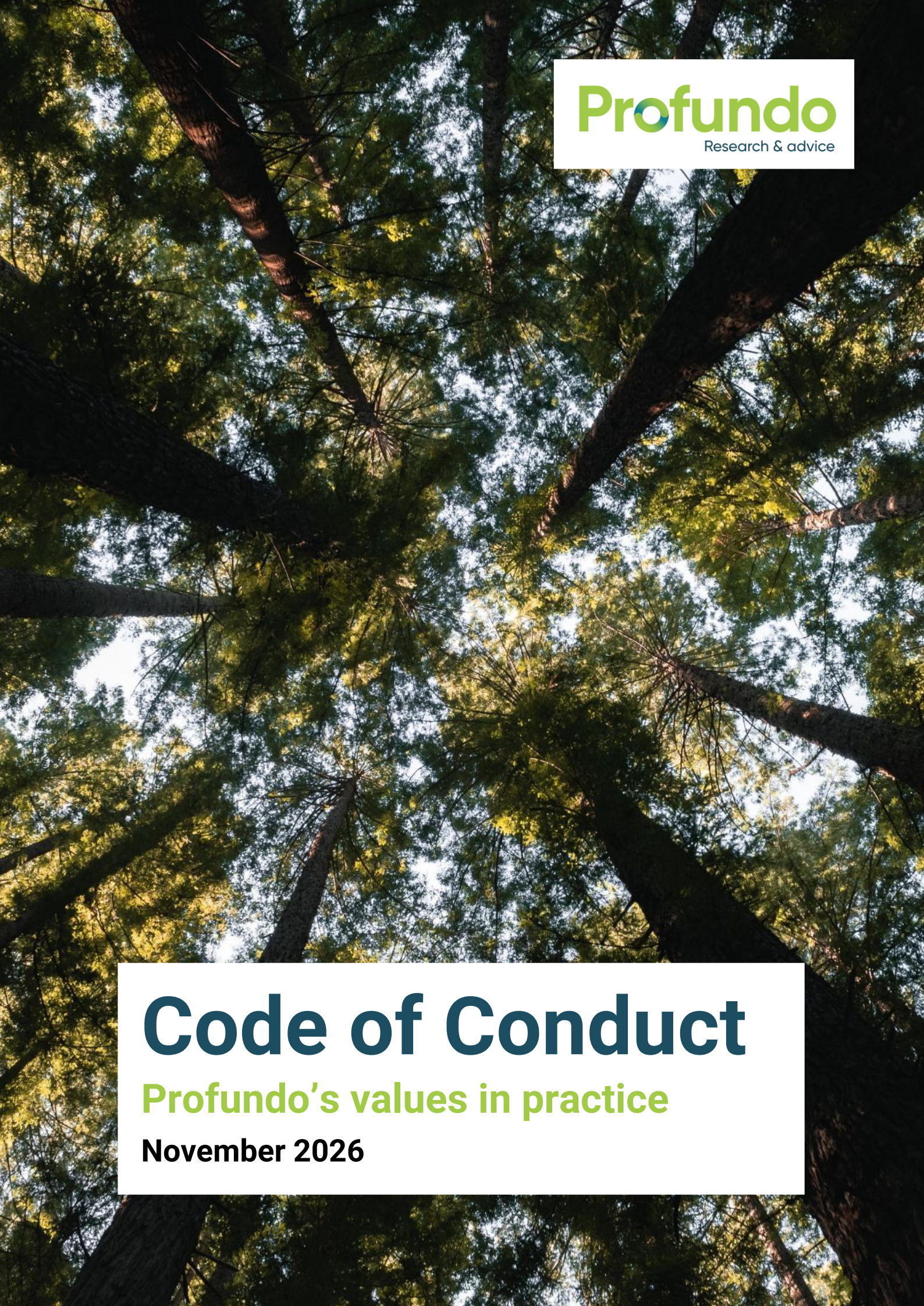


Profundo
Research & advice

Code of Conduct

Profundo's values in practice

November 2026

Profundo
Research & advice

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Introduction

With action-oriented research, advice, and capacity building, Profundo Research Foundation aims to make a practical contribution to a sustainable world and social justice. We see it as our role to unravel the facts, analyse the patterns, expose the vested interests, and identify the opportunities for change. This helps our clients and partners to exert influence where it is most effective.

Profundo is a non-profit foundation offering research, training and advisory services to clients such as civil society organisations, trade unions, research institutes, governments and other public organisations that are committed to promoting sustainability and social justice. We also work as a partner with civil society organisations and research organisations on more extensive programs in which research activities are combined with strategies to influence important stakeholders to bring about more sustainability and social justice. Governments and philanthropic donors fund these projects. Our clients and partners come from all over the world.

Profundo's core activity is research: with an open mind, we endeavour to know more and to identify and analyse all relevant facts. Our research activities result in reports and other publications, as well as in bespoke advice and capacity-building activities. This Code of Conduct sets out how Profundo strives to conduct its research, advice and training activities with high accuracy, integrity, and independence. The CoC clarifies how Profundo operates, which ethical and quality standards we abide by, and what clients, partners, donors, research subjects, training participants and other stakeholders can expect of us.

The CoC is guiding all employees of Profundo, as well as the Supervisory Board members, interns, freelancers and volunteers working at - or on behalf of - Profundo. It cannot address all situations that may arise, but sets out guidelines and defines underpinning values which will help us to assess any situation well and act in line with our values.

1 Compliance with laws and CSR standards

Profundo commits to comply fully with the relevant laws and regulations in the Netherlands and all other countries in which we operate, with all international conventions and agreements, as well as with best practices, with regard to ethics, social responsibility, and the protection of the environment. Below is an overview of such laws and standards, which is not intended to be exclusive:

- Dutch Criminal Code
- All relevant conventions of the International Labour Organization, including the Fundamental Principles and Rights at Work, guaranteeing:
    - freedom of association and the effective recognition of the right to collective bargaining;
    - the elimination of all forms of forced or compulsory labour;
    - the effective abolition of child labour;
    - the elimination of discrimination in respect of employment and occupation; and
    - a safe and healthy working environment.
- United Nations Convention for the Rights of the Child (UNCRC)
- United Nations Convention Against Corruption
- United Nations Convention on the Elimination of All Forms of Discrimination against Women (CEDAW)
- United Nations Convention for the Protection of Human Rights and Fundamental Freedoms
- United Nations Convention on the Rights of Persons with Disabilities

- United Nations Declaration on the Elimination of Violence against Women
- United Nations Guiding Principles on Business and Human Rights
- United Nations Global Compact Principles
- OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions
- OECD Guidelines for Multinational Enterprises on Responsible Business Conduct
- Council of Europe Convention on the Protection of Children against Sexual Exploitation and Sexual Abuse
- European Union Directive on combating sexual abuse, sexual exploitation of children and child pornography
- Core Humanitarian Standard on quality and accountability
- Transparency International Business Principles for Countering Bribery;

2 Independence

The independence of our organisation is a critical asset for Profundo, to be able to gather data, write reports, and formulate conclusions in an accurate, fair and unbiased way. To maintain its independence, Profundo has established several safeguards listed in the following sub-sections.

2.1 Financial and organisational independence

As a non-profit foundation, Profundo is financially and organisationally independent from governmental, corporate, political, religious or other interests. The daily operations by the managing director, under full supervision of the five-person Supervisory Board. Among the supervisory tasks of the Supervisory Board is to ensure that the independence and stability of Profundo are guaranteed by the financial policy implemented by the managing director.

Our financial and organisational independence is further guaranteed by:

- As a foundation, Profundo has no shareholders with financial interests;
- Profundo works for and with many clients, partners and donors to avoid relying excessively on one source of income;
- Profundo has no (bank) loan outstanding, avoiding any influence by external financiers;
- Profundo takes a strong position on not compromising our principles in exchange for a lucrative assignment. We reserve the right to refuse a potential project in case:
    - it does not match our broad goals of striving for more sustainability and social justice;
    - the client does not accept our independence or research quality standards; or
    - it creates a conflict of interest or compromises our integrity in any other form;
- Profundo also has a strict zero-tolerance policy on bribery and corruption (see section 7) to avoid compromising its independence.

2.2 Ideological and political independence

Our mission is:

> *Providing action-oriented research, advice and capacity building to advance sustainability and social justice*

We feel engaged with the broad goals of sustainability and social justice. Our engagement becomes apparent in the thematic areas, sectors and research questions we are researching. But

this engagement does not compromise our position as an independent research company. We analyse facts and strive to conclude as objectively as possible. We form independent opinions based on the outcomes of our research and analyses.

Profundo will only work with clients, partners and donors who share the same values regarding sustainability and social justice. However, Profundo is not committed to, nor bound by, the specific opinions and objectives of any client, donor, partner, political party, government, or other organisation. We clarify this position in our research reports, and we strive to let our clients explain this in all their publications, if they are (partially) based on our research.

In line with our mission, Profundo preserves the right to initiate debates on important issues and support calls by civil society for more sustainability and social justice. After consulting with staff members with specific expertise on the topic, the director is responsible for deciding on Profundo's support for such calls.

3 Research quality and integrity

We always base research on a transparent methodology and operate professionally and unbiasedly, striving to identify all relevant facts. We strive to be objective, critical and nuanced in our analyses and conclusions. We guard our freedom to conclude according to our standards and avoid conflicts of interest. Under no circumstances do we manipulate or fabricate our findings.

3.1 Quality standards

To ensure high quality and integrity standards in our research processes, Profundo follows the fundamental principles of research integrity defined by *The European Code of Conduct for Research Integrity (ECOCRI)* of the European Federation of Academies of Sciences and Humanities (ALLEA):

- **Reliability** in ensuring the quality of research, reflected in the design, methodology, analysis, and use of resources.
- **Honesty** in developing, undertaking, reviewing, reporting, and communicating research in a transparent, fair, full, and unbiased way.
- **Respect** for colleagues, research participants, research subjects, society, ecosystems, cultural heritage, and the environment.
- **Accountability** for the research from idea to publication, for its management and organisation, for training, supervision, and mentoring, and for its wider societal impacts.

Profundo maintains specific quality standards for each research and advice service offered and ensures that these standards are integrated into guidance notes and applied in all research projects. Profundo's project proposals, research methodologies, research processes and reports are reviewed internally to ensure their respect for our integrity and quality standards.

Methodologies are invariably designed to allow for an open and unbiased analysis of the facts found. We use a variety of scientific methods to come to independent conclusions. Depending on the research design, research subjects are offered the opportunity to give feedback in advance on the research methodology. The methodology used for a specific research project is always described clearly in the final report.

References are included for all relevant data and information sources used in Profundo reports. If any doubt arises regarding the information found in a specific source, this information will always be double-checked with a second source. Data gaps and insecurities will be clearly named. If data do not appear to be reliable, they are not used. Profundo has a strict policy to recognise and name the authors of all publications quoted in our research outputs. Any form of plagiarism is avoided.

3.2 Approach to the use of AI

As a data- and knowledge-driven organisation, Profundo recognises that advances in generative AI

can open new possibilities for efficiency and the optimisation of research processes, provided it is used responsibly. We operate on the premise that AI support never replaces a researcher's thinking, critical judgement or accountability in producing research reports, analysis and recommendations. Without proper due diligence, AI can compromise the quality of our work by introducing unpredictable inaccuracies or mistakes; it also raises concerns about bias and plagiarism.

Generative AI may support our research and improve organisational efficiency, but original, in-depth research remains central to our work. Therefore, we limit our use of AI to assisting with coding, data collection and analysis, translation, summarising, language editing, and design. In practice, data support includes searching for relevant sources, checking large data volumes for consistency, omissions, and formula errors, performing calculations, and identifying patterns. All AI-assisted output is subject to human review and verification. We disregard AI-generated results that we cannot verify against original sources.

Confidential information provided by partners, clients or third parties, and identifiable interview data will never be uploaded to an AI tool.

We do not use AI when simpler, less energy-intensive tools and methods are available. Where AI use appears justified, the choice of model and adaptation of the research mode to the specific task matter. Moreover, prompt length and output length affect energy use. We aim to learn from in-house experience and external expertise to improve our AI efficiency and limit its environmental impacts as much as possible.

If AI contributions to research methods, analysis or published findings constitute substantive parts of a research output, this will be disclosed as part of our aim for transparency.

This policy will be reviewed regularly as AI technology develops.

3.3 Due hearing

Some of Profundo's projects require communication with corporate research subjects, such as financial institutions, to give input on the research topic via a questionnaire or interview. Depending on the research set-up agreed upon with the client, Profundo may contact the research subjects again before finalising the report to ask for feedback on the research results and conclusions. This ensures the right to due hearing of the research subjects. However, if reliable sources provide conclusive evidence on a case, the research subject will not always be contacted. Previous public statements on the research topic by the research subject are also considered as due hearing.

4 Data protection and data confidentiality

Profundo is careful with the personal data of its employees, applicants and external stakeholders (see section 8). Profundo complies with all regulations concerning the processing of personal data, in particular with the *General Data Protection Regulation 2016/697 (GDPR)* of the European Union, in the Netherlands better-know as the Algemene verordening gegevensbescherming (AVG). The Profundo office manager and financial administrator are responsible for implementing the GDPR in storing and managing employee data.

In its research reports, Profundo prefers to be transparent on the sources from which data are collected, also in the case that these data come from interviews with corporate research subjects, individual research subjects or independent experts. This transparency will allow readers and other interested parties to check the sources used for a research project and verify the data.

However, upon their request, Profundo will guarantee the anonymity of interviewees and persons providing information in any other form. In some cases, Profundo is also prepared to sign a Non-Disclosure Agreement (NDA) with an organisation or individual feeding information. Profundo is ready to do so if the NDA is proportionate and does not limit Profundo's freedom to conclude

according to its standards. Whenever data are retrieved from anonymous sources, Profundo will take extra steps to confirm the validity of the data by comparing them with data from public sources.

All data collected for research projects is stored in Profundo's digital archive. Profundo's *Policy on cyber security and data protection* ensures that all sensitive data remains confidential. This policy is accessible to all Profundo staff. All people working for Profundo, or on behalf of Profundo are also expected to exercise due care in their work and private life, not divulging any confidential information about clients, partners, colleagues, and other work-related matters in accordance with their terms of employment and this Code of Conduct.

5 Safeguarding

Profundo believes that every person, regardless of their background, age, culture, sexual orientation, gender identity, disability, ethnicity or religious belief, should be able to participate in a safe society without fear, violence, abuse, bullying, discrimination or exploitation. Keeping people safe from harm, protecting the integrity of all human beings, respecting human rights and diversity, stimulating inclusion, and promoting equality are part of Profundo's fundamental values.

Based on these values, we do not tolerate discrimination, violence or harm done by any Supervisory Board member, director, employee, intern, or volunteer working at Profundo, nor by any partner or freelancer acting on our behalf. They are expected to be conscious not to abuse the power and influence they have by virtue of their position over the lives and well-being of the people they interact with in the course of their work at (or on behalf of) Profundo.

The ILO defines violence and harassment as "a range of unacceptable behaviours and practices, or threats thereof, whether a single occurrence or repeated, that aim at, result in, or are likely to result in physical, psychological, sexual or economic harm, and includes gender-based violence and harassment." This violence and harassment can take different forms, including but not limited to the following:

- Bullying
- Discriminatory abuse
- Emotional or psychological abuse
- Exploitation
- Financial or material abuse
- Harassment
- Neglect
- Physical abuse
- Sexual abuse
- Verbal abuse

To avoid all such forms of violence and harassments, we expect from all people working for Profundo, or on behalf of Profundo, that they adopt an anti-discriminatory and inclusive language and approach in all their interactions with the people in our workplace and with the people we work with. We also expect that they will not exercise any behaviour that will cause discomfort, belittle or threaten other personnel of the organisation.

Respecting the privacy of other people and avoiding misinformation and the spreading of rumours are also clear commitments. And if differences or problems arise, with colleagues or external people, they need to be solved in a positive way. Everyone at Profundo is expected to contribute to building constructive dialogue, guided by mutual respect and an open, positive approach, between management and staff representatives. employees.

Our zero-tolerance policy applies to discrimination, harm or abuse directed against people inside Profundo itself (see section 9.1) as well as against external stakeholders (see section 8) and other

individuals. As far as it is in our might, we will also take action to protect our employees and external stakeholders from discrimination, harm and abuse done against them by others.

We require Profundo's Supervisory Board members, director, employees, interns, volunteers, and freelancers who act on our behalf, to confirm in writing that they have read this Code of Conduct and will adhere to its values, standards and requirements. From our clients, partners and donors we also expect that they do not tolerate discrimination, harm or abuse in any form. Further details on our approach towards discrimination, harm and abuse are described in our separate *Safeguarding Policy*, which is accessible to all Profundo staff.

6 Transparency

As a research organisation focused on unravelling and analysing facts related to sustainability, the corporate world and government policies, transparency is at the core of what we do and who we are. Therefore, we also try to be transparent about our organisation, activities and funding. On our website, we publish the following:

- who are the managing director and the members of the Supervisory Board of Profundo Research Foundation;
- all staff members currently working for Profundo;
- all clients we worked for in the past 20 years and all donors who have funded our projects;
- all projects (for clients as well as donor-funded projects) we worked on in the past 20 years;
- the audited financial statements of Profundo Research Foundation;
- all memberships of Profundo, which comprise at this moment of the Principles for Responsible Investment, MVO Nederland, Duurzaam Ondernemen and the Dutch Association of Investors for Sustainable Development (VBDO).

7 Corruption and conflicts of interest

7.1 Payments to and by Profundo

Payments made to Profundo by clients and other third parties will only be accepted when they are made in response to an invoice sent by Profundo. Grants from donors will only be accepted when they are based on a signed contract. An invoice will only be sent to a client if it is based upon a contract between Profundo and the client or if Profundo has written evidence (in the form of a report or a written confirmation by the client) that the service has been offered.

Profundo has a no-cash policy. All payments made by Profundo to suppliers, staff, the tax office and other third parties are made via our bank and creditcard accounts and must be based on invoices received or other written agreements. Profundo can only pay third parties to provide information or participate in different forms in research projects when there is a legitimate reason to do so, and applicable legislation and rules are respected.

Profundo keeps all invoices and other financial records, which will evidence the business reasons for making payments to third parties and receiving payments from third parties for seven years. The financial records are maintained by Profundo's financial administrator and controlled by its director, as well as Profundo's external accountant.

7.2 Gifts received by Profundo

Gifts from suppliers or other external parties may not be accepted if they exceed a value of 50 euros, if they are in cash or if a favour is expected in return.

Smaller gifts received by any employee have to be reported to the office manager and will be - when physically possible - divided among the Profundo employees and interns. Gifts that cannot be divided will be displayed in Profundo's office or donated to a charitable organisation.

Employees are not allowed to offer gifts or hospitality to representatives of (prospective) clients, donors, or other third parties if these gifts could be regarded as illegal or improper. This is, in any event, the case if these gifts exceed a value of 50 euros, if they are in cash or if a favour is expected in return.

7.3 Donations made by Profundo

Profundo does not make donations, whether in cash or in kind, in support of any political party or candidate, as this can be perceived as an attempt to gain an improper business advantage.

Profundo can occasionally make (charitable) donations to (grassroots) civil society organisations, provided their objectives align with the mission of Profundo: to make a practical contribution to a sustainable world and social justice. This support can be offered through in-kind services, knowledge, time, or a financial donation.

However, to ensure that charitable donations are not used as a scheme to conceal bribery, the following precautionary measures apply:

- Profundo only makes charitable donations that are legal and ethical under local laws and practices;
- No donation can be offered or made without the prior approval of the director;
- Donations can only be offered to civil society organisations through their official communication channels and should always be based on proper financial records;
- Donations to individual representatives of civil society organisations need to follow the rules as laid down under gifts (section 7.2); and
- Profundo will publicly disclose charitable donations to civil society organisations in its annual report.

7.4 Conflicts of interest

A conflict of interest can be defined as a situation in which financial or other relations may compromise, or have the appearance of compromising, a researcher's professional judgment in conducting or reporting research.

A conflict of interest may arise or be perceived by our clients, partners and other stakeholders when a person or an organisation that is a research subject in one of our research projects also becomes a client for another project.

To avoid such conflicts of interest, Profundo will not work for a client or donor who is (or has been) a research subject in an assignment for another client, or vice versa, unless:

- The research topics in which both clients are interested do not overlap; or
- There is a time gap of two years between the two assignments.

8 Relationships between Profundo and external stakeholders

Profundo strives for fair, open, non-discriminatory relationships with external stakeholders, following the principles described in sections 1 to 7. The following sub-sections describe more specifically what different external stakeholders - including clients, donors, partners, research subjects, training participants, freelancers, job applicants, suppliers, and other stakeholders - may expect of Profundo.

8.1 Relationships with clients

Clients hire Profundo to provide research, advice and training services. Clients pay for our services and use the outcomes for their goals and objectives.

In our relationships with clients, we endeavour to develop and execute high-quality research, advice and training projects so that the client's goals and objectives are met as well as possible, within limits set by the available budget, the desired timeline and the availability of necessary data. Our clients may expect us to:

- communicate transparently on all aspects of each project;
- use our experience, expertise, and creativity to design a research project which will meet the goals and objectives of the client as well as possible;
- propose a fair and reasonable budget for our services;
- agree on a clear contract which describes the responsibilities of both sides;
- abide by this Code of Conduct and our Safeguarding Policy (see section 5);
- deliver high-quality research, advice and training services based on transparent methodologies and resulting in clear conclusions;
- exert ourselves to meet the planning agreed upon with the client;
- meet our contractual obligations;
- keep our research findings confidential at all times unless the client has published the research findings; and
- take responsibility if the project results are below expectations through our fault by doing all that is needed to satisfy the client.

While we aim to support our clients with our research, advice and trainings, we do not necessarily identify with the recommendations and messages of our clients, whether or not these are based on the results of our research or advice. We strive to make this position clear in all publications (partially) based on our services and published by our clients by including a standard text that credits our research work.

Our *General Terms and Conditions*, which describe the relationship with our clients in more (practical) detail, are accessible on our website.

8.2 Relationships with donors

Donors are private (charitable) foundations and government funding agencies that might fund significant research and influencing projects we have developed together with one or more partners (see section 8.3). Unlike our clients, donors usually do not take the initiative for projects. Through a Call for Proposals or otherwise, they make clear that they are open to reasonable proposals creating social impact, which they would like to fund. When funding is agreed upon, they don't review the results of our project in detail, and they will usually not do anything themselves with the results of our research.

In our relationships with donors, we aim to execute, together with our partners, the proposals the donor approves so that the donor's funds are used as effectively and efficiently as possible to create the social impact promised in our project proposals. Donors may further expect us to:

- communicate transparently on all aspects of the project;
- develop a proposal which fits into the priorities of the donor and will have a significant social impact;
- propose a fair and reasonable budget for our proposal;
- agree on a clear contract which describes the responsibilities of both sides;
- deliver high-quality research and advice based on a transparent methodology and resulting in clear conclusions;
- disseminate our research findings and work together with our clients to achieve social impact;

- exert ourselves to meet the proposed planning;
- meet our contractual (reporting) obligations;
- abide by this Code of Conduct and our Safeguarding Policy (see section 5); and
- take responsibility if the research project results are below expectations through our fault by doing all that is needed to meet the original expectations.

8.3 Relationships with partners

Our core activities are research, advice and training, not campaigning or influencing. Therefore, to develop long-term influencing strategies and platforms eligible for donor funding, we build long-term collaborative relationships with NGO partners who are strong at campaigning and/or engagement with corporates, financiers and governments.

We will select our partners based on their work quality, capacity to carry out advocacy activities, and values, which must be aligned with this Code of Conduct. At the start of each partnership, Profundo will agree with the partner on a Memorandum of Understanding (MoU) on expectations and standards concerning the activities and responsibilities of both sides and the procedures for handling conflicts and possible cases of misconduct.

Our partners may expect us to:

- communicate transparently on all aspects of the joint project;
- use our experience and creativity to design research activities which will meet the goals and objectives of the joint project as well as possible;
- abide by this Code of Conduct and our Safeguarding Policy (see section 5);
- agree on a clear Memorandum of Understanding (MoU) which describes the responsibilities of both sides;
- deliver high-quality research and advice based on a transparent methodology and resulting in clear conclusions;
- exert ourselves to meet the planning agreed in advance;
- support the partner in undertaking advocacy activities to achieve the desired social impact;
- meet our contractual obligations; and
- take responsibility if the project results are below expectations through our fault by doing all that is needed to meet the original expectations.

8.4 Relationships with corporate research subjects

Corporate research subjects are companies, financial institutions and other organisations that are being researched in any of Profundo's research projects. Research subjects may expect us to:

- base our research and the conclusions we draw on their organisation on a transparent methodology and reliable sources;
- abide by this Code of Conduct and our Safeguarding Policy (see section 5);
- provide sufficient time in case we ask for their cooperation in the form of a survey or interview;
- process their responses to the survey or in the interview in an unbiased, non-selective way;
- provide an opportunity to comment on our findings regarding their organisation (in case this is part of the design of the research);
- process their feedback professionally, correcting errors and conscientiously considering the relevance of other comments; and
- explain how and why we have concluded regarding their organisation.

8.5 Relationships with individual research subjects

In some of our research projects, we research the views and experiences of (groups of) individuals, for instance, local communities, smallholders and workers in certain sectors. In this Code of

Conduct, we classify such individuals as individual research subjects. Among them, there might be vulnerable adults. Children are normally not among the subjects of our research, but in the future this cannot be excluded.

Because the group of individual research subjects includes vulnerable adults and (maybe in the future) children, we pay special attention to this stakeholder group - in line with our Safeguarding Policy (see section 5). This means that individual research subjects may expect us to:

- base our research and the conclusions we draw on a transparent methodology;
- process their responses to a survey or interview in an unbiased, non-selective way;
- abide by this Code of Conduct and our Safeguarding Policy (see section 5);
- have zero-tolerance towards any form of discrimination, harm or abuse individual research subjects or their families might experience through the actions of any of our staff or of freelancers or partners working on our behalf;
- protect their privacy and personal data in line with the GDPR (see section 4);
- make them aware of the channels through which they can complain about their interactions with Profundo and of the procedures which will be followed (see section 10.2).

Further details are described in our separate *Safeguarding Policy*, which is accessible to all Profundo staff.

8.6 Relationships with training participants

We regularly give trainings to members of civil society organisations, including local community organisations. Sometimes, employees of companies, financial institutions and government bodies also participate in these trainings. Among these training participants, there might be vulnerable adults. Therefore, we pay special attention to this stakeholder group, in line with our Safeguarding Policy. This means that training participants may expect us to:

- create a safe space in which the training will be given, among others by requesting the participants if they object to pictures being taken;
- make sure that all interactions are respectful and open;
- abide by this Code of Conduct and our Safeguarding Policy (see section 5);
- have zero-tolerance towards any form of discrimination, harm or abuse participants might experience through the actions of any of our staff or of freelancers or partners working on our behalf;
- protect their privacy and personal data in line with the GDPR (see section 4);
- will send them an evaluation form to gather anonymous feedback on the training; and
- make them aware of the channels through which they can complain about their interactions with Profundo and of the procedures which will be followed (see section 10.2).

Further details are described in our separate *Safeguarding Policy*, which is accessible to all Profundo staff.

8.7 Relationships with external experts

External experts are individuals who can be interviewed for one of our research projects because of their specific knowledge or expertise. External experts may expect us to:

- base our research and the conclusions we draw on a transparent methodology and reliable sources;
- abide by this Code of Conduct and our Safeguarding Policy (see section 5);
- provide sufficient time in case we ask for their cooperation in the form of a survey or interview;
- process their responses to the survey or in the interview in an unbiased, non-selective way;
- provide sufficient opportunity to comment on how we process the information and opinions offered, especially when quoted literally;

- process their feedback professionally, correcting errors and conscientiously considering the relevance of other comments.

8.8 Relationships with freelancers

Freelancers are researchers, designers, or other specialists to whom we outsource a part of one of our research projects based on a freelance contract. Freelancers may operate independently or may be employed by another organisation. Freelancers may expect us to:

- communicate transparently on all aspects of the project;
- define clearly which activities are expected of them and give sufficient guidance on these activities;
- abide by this Code of Conduct and our Safeguarding Policy (see section 5);
- agree on a clear freelance contract which describes the responsibilities of both sides, including timelines and fees;
- exert ourselves to meet the planning agreed in advance;
- meet our contractual obligations.

As freelancers will act on our behalf, they will have to confirm in writing that they have read this Code of Conduct and will adhere to its values, standards and requirements (see also section 5).

8.9 Relationships with job applicants

Job applicants include people applying to specific vacancies published by Profundo, or people sending us an open application. As an equal opportunity employer striving for a diverse and inclusive workplace, we especially encourage applicants from minority backgrounds to apply for our vacancies.

Simultaneously, we use a safer recruitment approach as an integral part of Profundo's commitment to build an organisational culture wherein the safety and well-being of everyone involved is paramount. The overall purpose of safer recruitment is to help identify and deter or reject applicants who are deemed to pose a risk to their colleagues, research subjects and other people we come into contact with through our work.

In our recruitment processes and employment offers, job applicants may expect us to:

- mention the safeguarding responsibilities of our staff in all Profundo job descriptions;
- abide by this Code of Conduct and our Safeguarding Policy (see section 5);
- communicate transparently and respectfully during all phases of the recruitment process;
- do not let any form of discrimination play a role and respect our safeguarding principles (see section 5);
- verify the identity of the applicant through a recognised identity document;
- meet legislative requirements in terms of relevant pre-employment checks;
- request two references before confirming a job offer;
- include a probation period in the first employment contract;
- ensure a safe onboarding period and environment once the applicant is hired;
- treat all application data submitted by the applicant (including CV, motivation letter, writing and/or research sample, correspondence regarding the application process, notes on the job interview, and test assignment) as confidential and in accordance with the GDPR (see section 4); and
- delete all application data as mentioned above at the latest after the following periods:
    - 4 weeks after the application process is finished, in case of an application to a specific vacancy published by Profundo. If we would like to keep the data after the 4-week period, we will ask permission from the applicant to keep the data for a maximum of 1 year. After this year, the application data will be deleted, or permission will be requested again; and

- 1 year after the submission of an open application.

8.10 Relationships with suppliers

For its procurement of goods and services, Profundo will always look for the most sustainable supplier that meets internationally supported CSR standards in all its activities and behaviour. Our suppliers may further expect us to:

- communicate transparently;
- define clearly which goods and services are expected of them;
- abide by this Code of Conduct and our Safeguarding Policy (see section 5); and
- meet our contractual obligations.

8.11 Relationships with other stakeholders

In our relationships with other stakeholders, we commit to the general standards described in sections 1 to 7.

9 Relationships between Profundo and its employees

This section describes the key expectations regarding the relationships of its employees, Supervisory Board members, interns, volunteers and freelancers with each other and with Profundo as an organisation.

9.1 Safeguarding

Profundo believes that every person, regardless of their background, age, culture, sexual orientation, gender identity, disability, ethnicity or religious belief, should be able to participate in a safe society without fear, violence, abuse, bullying, discrimination or exploitation. Keeping people safe from harm, respect for human rights, especially diversity and inclusion, integrity, and commitment to promote equality are part of Profundo's fundamental values. Profundo promotes respect for others, has zero tolerance for sexual exploitation and abuse of vulnerable adults and children and discrimination because of creed, colour, race or any other diversity factors. This applies to all relationships, both internally and externally.

Based on these beliefs, we do not tolerate harm or abuse done by, nor done to, all our employees, applicants, interns, and volunteers of Profundo and its external stakeholders (see section 8). Harm and abuse can take different forms, including but not limited to the following:

- Bullying
- Discriminatory abuse
- Emotional or psychological abuse
- Exploitation
- Financial or material abuse
- Harassment
- Neglect
- Physical abuse
- Sexual abuse
- Verbal abuse

It is Profundo's policy to ensure that all persons working at Profundo respect each other and strive to help each other professionally and respectfully. Profundo's management will promote an inclusive, fair, open and positive culture. When conflicts arise, staff members are encouraged to settle their disputes amicably where possible. However, where this is not possible, Profundo expects that those involved feel able to report concerns, confident in the knowledge that they will

be heard and responded to in an objective and timely manner (see section 10.2). Further details are described in a separate *Safeguarding Policy*, which is accessible to all Profundo staff.

- Profundo is an internationally oriented organisation with staff from different nationalities as well as an equal opportunity employer striving for a diverse and inclusive workplace;
- Profundo seeks to help refugees integrate into Dutch society by offering them a stable and safe place to work, which they can use to build a network and learn (more) Dutch;
- Profundo strives for gender equality in its hiring and promotion policies. Equal payment is evident, and we strive for similar percentages of women and men among the coordinating staff;

This Code of Conduct aims to create a culture of safety and well-being and reduce the risks of harm. Therefore, Profundo's Supervisory Board members, director, employees, interns, volunteers, and freelancers who act on our behalf, will have to confirm in writing that they have read the Code of Conduct and will adhere to its values and standards.

9.2 Working from abroad

All Profundo employees can work from wherever they want: in the Profundo office, from home, or from another location. Some of our employees are now working permanently from abroad. In line with our Policy on Working Locations, this requires efforts from all people working at Profundo to create the right conditions for collaboration and the exchange of ideas and experiences. All employees should fill in their Outlook calendars properly, share relevant information with everyone who should have this information, plan online meetings at moments that everyone can join, make efforts to join all online meetings and join the semi-annual teamdays. In general, we expect all Supervisory Board members, the director, employees, interns and volunteers to adopt an inclusive, welcoming attitude towards everyone in the team, irrespective of their working location.

9.3 Inappropriate personal relationships

Profundo's Supervisory Board members, director, employees, interns, volunteers, and freelancers who act on our behalf are expected not to engage in inappropriate personal relationships in the workplace or with research subjects or training participants. An inappropriate relationship is defined as a relationship of a romantic or intimate nature, where there is a power dynamic between the individuals, such as in the relationship between a coordinator or director and a working group member.

Profundo strongly believes that an environment where employees maintain clear boundaries between personal and work-related interactions is most effective for conducting its activities. Romantic relationships may cause misunderstandings, conflicts of interest, complaints of favouritism and negative employee morale. Also, they might lead to sexual harassment claims if the relationship ends.

An employee who becomes romantically involved with a colleague or with anyone else working on behalf of Profundo should immediately and fully disclose the relevant circumstances to the office manager or director so that a determination can be made as to whether the relationship presents an actual or potential conflict of interest. If so, Profundo may take appropriate action according to the circumstances, up to and including termination of the employment contract.

9.4 Use of alcohol and other substances

Profundo expects all its Supervisory Board members, the director, employees, interns, volunteers, and freelancers who act on our behalf to refrain from being under the influence of alcohol or other substances and from possessing any illegal substance when undertaking activities for Profundo or when representing the organisation.

9.5 Salaries and employee benefits

Profundo has developed clear policies and procedures for hiring, remunerating and promoting employees, interns, and volunteers. These policies and practices are described in Profundo's *Policy on Salaries and employee benefits*, which is accessible to all Profundo staff. In this policy, we describe the function profiles and salary scales we use. We also clarify the procedures and criteria for inflation compensation, salary increases, promotions, paid leave and unpaid leave.

9.6 Equal opportunities

As an equal opportunity employer, Profundo is striving for a diverse and inclusive workplace. Apart from what is mentioned in section 9.1 on Safeguarding, we also aim to create such a workplace by offering, among others:

- a friendly office close to the Amsterdam Sloterdijk train station, which is accessible to people with physical challenges;
- a resting room at the office which can be used for praying or meditation;
- flexible working hours and the right to switch public holidays;
- the opportunity to work most of the time from home; and
- twice a week a healthy vegetarian lunch at the office for free, which can be adjusted to accommodate different dietary preferences (Halal, Kosher, allergies, a.o.).

9.7 Safety, health and well-being

Profundo aims to create a stimulating and pleasant working environment and a culture of safety and well-being, in which all forms of harm, stress-related issues and physical problems are avoided as much as possible. This means that we set high standards in terms of Occupational Safety and Health (OSH) for all employees, interns and volunteers. We conform to *Convention 155 concerning Occupational Safety and Health and the Working Environment* of the International Labour Organisation (ILO) and to all legal OSH requirements in the Netherlands.

As legally required, we regularly conduct a systematic *Risk Assessment and Evaluation (RI&E)* of all the risks that Profundo employees might face. Based on the outcomes of this RI&E and on scientific insights on promoting health and safety at the workplace, Profundo has developed a *Policy on Occupational Safety and Health (OSH)*, which is accessible to all Profundo staff.

To limit stress-related problems, this OSH policy describes how Profundo is:

- offering support on planning and time management;
- stimulating breaks and relaxing;
- giving sufficient appreciation to all employees;
- offering all employees access to our external confidential counsellor (Francien Resius, tel. 06-55192669, email: francien.resius@bmwvoorelkaar.nl) to discuss mental health issues; and
- helping all employees to maintain a good balance between work and private life.

For this last reason, Profundo does not have formal working hours and timetables for employees. Each employee is responsible for their own planning and time management. Profundo does offer tools to help employees plan their time in such a way as to avoid too much workload.

To avoid physical problems, the OSH policy describes how Profundo is:

- Offering good furniture and equipment to all employees in the office;
- Providing advice on Occupational Safety and Health issues to all employees;
- Stimulating breaks and physical movement;
- Offering professional massage to relieve back and neck tensions;
- Offering good and healthy lunches for free (twice a week); and
- Provide good furniture and equipment to all employees setting up a home office.

Our approach to Occupational Safety and Health focuses on prevention in the first place. Still, when an employee falls ill and cannot work, we aim to support their swift recovery and reintegration. Our OHS policy describes how we follow all required procedures, engage experts and collaborate closely with the employee to find options for recovery and reintegration.

9.8 Fraud

Employees of Profundo must abstain from any form of fraud or fraudulent behaviour. This includes, in any event:

- Falsifying data, plagiarism and any other breach of our research quality and integrity standards (see section 3);
- Registering more hours in Profundo's time registration than the number of hours worked on behalf of Profundo;
- Claiming reimbursement of expenses from Profundo for expenses that have not been made or for expenses which are not related to working at Profundo;
- Taking away goods that belong to Profundo or the owner of our office space or not returning such goods at the first request after the termination of the employment contract; and
- Taking away goods or demanding personal favours from any of our clients, partners, donors or research subjects.

9.9 Sustainable behaviour

Profundo expects all employees to contribute to a more sustainable world in their work-related behaviour. For daily commuting, employees are encouraged to use modes of transport which emit less greenhouse gases (GHG). For business travel, travel by air is discouraged within Europe.

Employees are also expected to save energy and water in the office and limit and separate waste. Profundo's policy regarding *Sustainability of our own activities* is accessible to all Profundo staff.

10 Compliance with this Code of Conduct

10.1 Responsibilities

The director is responsible for ensuring that this Code of Conduct complies with our legal and ethical standards and that all employees of Profundo comply with it. Profundo's Supervisory Board members, director, employees, interns, volunteers, and freelancers who act on our behalf, are required to confirm in writing that they have read the Code of Conduct and will adhere to its values and standards. The Code of Conduct is published on Profundo's website. The office manager is responsible for dealing with any queries on its interpretation, consulting with the director where necessary.

10.2 Whistleblowing

People working at Profundo (see section 10.2.1) as well as external people (see section 10.2.2) are encouraged to report on any concerns they might have regarding compliance with this Code of Conduct by any of our employees or any of the other people working on our behalf.

10.2.1 Internal reports

Profundo requires all its Supervisory Board members, employees, interns, volunteers, freelancers and anyone else acting on our behalf to immediately report concerns, suspicions, allegations and incidents that indicate a potential violation of the guidelines in this Code of Conduct by one or more people working for Profundo, or on behalf of Profundo. Such concerns can be reported via email or in person to the office manager, a coordinator or to the director. In addition, all employees

can contact Profundo's external confidential counsellor, Francien Resius. She can be reached via telephone number 06-55192669 or via email: francien.resius@bmwvoorelkaar.nl.

Due to fear of reprisals, Profundo recognises that raising a concern or making an allegation can be difficult for any employee or for others working on behalf of Profundo. But employees are often the first to realise that there may be something seriously wrong; therefore, "whistleblowing" is viewed by Profundo as a positive act that can make a valuable contribution to the proper functioning of the organisation and the well-being of all employees. It is not disloyal for colleagues or Profundo to speak up.

If an employee believes the suspicion is true or may be true, they should have no reason to fear reporting their concern as a duty of care. Where concerns are raised in good faith, during the process, Profundo will do all it can to help the whistleblower throughout the investigation. This means that all concerns will be taken seriously, all concerns will be treated in confidence, and every effort will be made not to reveal the whistleblower's identity if that is the whistleblower's wish.

If an investigation finds that the concerns or allegations made by a whistleblower are untrue or have not been substantiated, but were reported in good faith, then no action will be taken against the whistleblower. However, if the investigation finds that an accusation against another employee was deliberately false with the intention to damage a colleague, disciplinary measures will be taken, and the false accusation will be reported to the local authorities as a potential criminal offence.

10.2.2 External reports

Research subjects and training participants will be informed about Profundo's whistleblowing procedure, as described in this section, by the project leaders. All external stakeholders are encouraged to submit concerns, suspicions, allegations and incidents that indicate a potential violation of the guidelines in this Code of Conduct by any person working for or with Profundo. Such reports can be filed on our website or can be sent by email to our safeguarding lead.

10.3 Investigation of allegations

The safeguarding lead (our office manager) and the director will follow up on a confidential basis when concerns are raised in an internal or external report. They are committed to investigating claims thoroughly and fairly. The whistleblower reports are always kept confidential and only shared on a need-to-know basis.

Identities of survivors and subjects of concern are always kept confidential. Ensuring that a survivor is safe and their mental and physical health is taken care of, receives the highest priority.

The director and safeguarding lead will then discuss the concern raised with the accused employee(s) and - where possible - with the whistleblower. Firstly, an understanding needs to be reached about which facts have happened. Secondly, the motives and explanations of the employee(s) need to be understood.

If an employee is accused of an act of harm, they can be suspended and requested to remain away from the office while an investigation takes place into the incident ("neutral ground"). The employee in the neutral ground may not have contact with other employees on the progress of the disciplinary inquiry without the formal permission of the director.

The director and safeguarding lead will then evaluate if there is sufficient clarity about which facts have happened and what arguments are mentioned by the accused employee to explain their behaviour. Both the facts and the arguments of the accused employee will be taken into account to decide if the guidelines in this CoC are violated and if this has been done intentionally. If the director and safeguarding lead conclude that a violation has take place, appropriate steps will be

taken to ensure that the accused employee is held responsible and that the violation will not occur again.

Depending on the seriousness of the violation, the employment contract may be ended following Dutch labour legislation. If a possible criminal act is involved, the case will also be referred to local authorities. If local authorities notify Profundo that the disciplinary procedure should be halted pending a police investigation, that instruction will be complied with.

10.4 Rebuilding trust

If no violation of this Code of Conduct is found, or if the violation does not lead to an end of the employment contract, the accused employee will be reinstated. Appropriate efforts will then be made to rebuild trust between the employees and others involved, to ensure that Profundo will continue to be a safe, stimulating and pleasant working environment for all employees.

11 Review and updates

This Code of Conduct will be periodically reviewed and updated to ensure that any changes in Profundo's organisation, in relevant legislation or in (international) good practices are considered. This review will be performed at least once every two years.