

Code of Conduct

Profundo's values in practice

April 2023

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Introduction

Profundo is an independent research organisation with a clear mission. With profound and fact-based research and advice, we aim to make a practical contribution to a sustainable world and social justice. Quality comes first, seeking to meet the needs of our clients and partners.

Profundo operates as one organisation consisting of two separate legal entities:

- Profundo B.V. is a social enterprise offering research, training and advisory services to clients such as NGOs, trade unions, research institutes, governments and investors who are committed to promoting sustainability and social justice; and
- Profundo Research Foundation is a foundation that works with NGOs and research partners 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. The Foundation also works for clients from low- and middle-income countries.

This Code of Conduct (CoC) applies to both legal entities.

Profundo's core activity is research. With an open mind, we endeavour to know more and to identify and analyse all relevant facts. This Code of Conduct sets out how Profundo strives to conduct its research 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 and the outside world can expect of us.

The CoC is guiding all employees of Profundo, as well as 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 of the Netherlands and all other countries where it operates.

Profundo also adheres to relevant international Corporate Social Responsibility standards, including:

- 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.
- OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions;
- OECD Guidelines for Multinational Enterprises;
- Transparency International Business Principles for Countering Bribery;
- United Nations Convention against Corruption;
- United Nations Convention on the Elimination of All Forms of Discrimination against Women;
- United Nations Global Compact; and
- United Nations Guiding Principles on Business and Human Rights.

Profundo is a service provider signatory of the Principles for Responsible Investment and a member of MVO Nederland, Duurzaam Ondernemen and the Dutch Association of Investors for Sustainable Development (VBDO).

2 Independence of our organisation

The independence of our organisation is critical for Profundo 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

Profundo is financially and organisationally independent from governmental, corporate, political, religious or other interests. All staff is employed by Profundo B.V., owned by its founder and director, Jan Willem van Gelder. As the only board member of Profundo Research Foundation, Jan Willem is supported by an Advisory Council of three external experts.

Our financial and organisational independence is further guaranteed by:

- Profundo has no external shareholders.
- Profundo works for many clients and donors to avoid relying excessively on one client or donor.
- 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:

With profound research and advice, Profundo aims to make a practical contribution to a sustainable world 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 is not committed to, nor bound by, the specific opinions and objectives of any client, donor, partner, political party, government, or other organisation. We will clarify this position in our research reports, and we strive to let our clients explain this in all their publications which are partially based on our research.

In line with our mission, Profundo preserves the right to initiate debates on important issues and support civil society calls 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.

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, the methodology, the analysis and the use of resources;
- Honesty in developing, undertaking, reviewing, reporting and communicating research in a transparent, fair, complete and unbiased way;
- Respect for colleagues, research participants, society, ecosystems, cultural heritage, gender identities, and the environment; and
- Accountability for the research from idea to publication, for its management and organisation, for training, supervision and mentoring, and its broader 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 does not appear to be reliable, it is 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.

Some of Profundo's projects require communication with the 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 of due hearing of the research subjects. However, if sufficient 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 and 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. The Profundo office manager and bookkeeper 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 case, these data come from interviews with stakeholders 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 from public sources.

All data collected for research projects is stored in Profundo's digital archive. Profundo's *Cyber security policy* ensures that all sensitive data remain confidential.

5 Non-discrimination

Profundo does not tolerate discrimination. No one should be denied their human rights because of race, colour, sexual orientation and gender identity, language, religion, political or another opinion, national or social origin, property or birth. This zero-tolerance for discrimination translates into the following concrete guidelines:

- 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;
- In our relationships with clients, donors, partners and other stakeholders, we will not tolerate discrimination from our own staff or our relations.

Profundo is currently working on a more detailed safeguarding policy which will apply to all employees, applicants, interns and volunteers of Profundo, as well as its external stakeholders (see also section 9.1).

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 is the owner and director of Profundo B.V., and who are the director and Advisory Council members 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 B.V. and Profundo Research Foundation;
- all memberships of Profundo.

7 Preventing 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 based upon 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.

All payments made by Profundo to suppliers, staff, the tax office and other third parties 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 bookkeeper 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 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 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);
- Profundo will publicly disclose financial donations to civil society organisations in its annual report.

7.4 Conflict of interests

A conflict of interest can be defined as a situation where financial relations or other personal considerations 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.

Profundo will only accept projects from clients and donors who share the same values. In principle, 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:

1. The research topics in which both clients are interested are not overlap; or
2. 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 4, 5, 6 and 7. The following sub-sections describe what external stakeholders may expect of Profundo, including clients, donors, partners, research subjects, freelancers, suppliers, and other stakeholders.

8.1 Relationships with clients

Clients hire Profundo to provide research and advice services and support their plans and activities. 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 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 of us that we:

- communicate transparently on all aspects of the research 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;
- deliver high-quality research and advice based on a transparent methodology 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 research 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 and advice, 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 describe the relationship with our clients in more (practical) detail, which clients may access on our website.

8.2 Relationships with donors

Donors are private (charitable) foundations and government funding agencies that might fund more significant research & influencing projects we have developed ourselves. Unlike our clients, donors usually do not take the initiative for projects. Through a Call for Proposals or otherwise, they make clear 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 of us that we:

- 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 planning proposed;
- meet our contractual (reporting) obligations; 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 activity is research, not campaigning or influencing. Therefore, to develop long-term influencing strategies and platforms eligible for donor funding, we must 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 that we:

- 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;
- agree on a clear 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 research subjects

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

- base our research and the conclusions we draw on their organisation on a transparent methodology and reliable sources;
- 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 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 of us that we:

- base our research and the conclusions we draw on a transparent methodology and reliable sources;
- 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 they offered, especially when they are quoted literally;
- process their feedback professionally, correcting errors and conscientiously considering the relevance of other comments.

8.6 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 of us that we:

- communicate transparently on all aspects of the project;
- define clearly which activities are expected of them and give sufficient guidance on these activities;
- 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.

8.7 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 of us:

- communicate transparently;
- define clearly which goods and services are expected of them;
- meet our contractual obligations.

8.8 Relationships with other stakeholders

In our relationships with other stakeholders, we commit to the general standards described in sections 4, 5, 6 and 7.

9 Relationships between Profundo and its employees

This section describes the key characteristics of Profundo's relationships with its employees, including applicants, interns and volunteers.

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. We do not tolerate harm or abuse for all 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
- 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 carelessly. When conflicts arise, staff members are encouraged to settle their dispute. If this is not possible, they can ask the office manager, a coordinator or the director to mediate. If a staff member has a conflict with the director, they can talk with an external confidential counsellor who can mediate.

Profundo is currently working on a more detailed safeguarding policy which will apply to all employees, applicants, interns and volunteers of Profundo and its external stakeholders.

9.2 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 freely accessible to all Profundo's employees, interns and volunteers. In this policy, we follow the salary scales of the CAO Nederlandse Universiteiten.

9.3 Safety and Health

Profundo aims to create a working environment which meets high standards in terms of Occupational Safety and Health (OSH) for all employees, interns and volunteers. Profundo, therefore, conforms with *Convention 155 concerning Occupational Safety and Health and the Working Environment* of the International Labour Organisation (ILO) and with all legal OSH requirements in the Netherlands. This includes conducting a systematic *Risk Assessment and Evaluation (RI&E)* of all the risks that Profundo employees might face.

Based on the RI&E and scientific insights on promoting health and safety at the workplace, Profundo has developed a Policy on Occupational Safety and Health (OSH) accessible to all employees. This policy aims to ensure a safe, stimulating and pleasant working environment in which stress-related and physical problems are avoided. Employees receive solid support to recover from illness and other health-related issues.

To limit stress-related problems, Profundo is:

- offering support on planning and time management;
- stimulating breaks and relaxing;
- giving sufficient appreciation to all employees;
- offering all employees access to an external confidential counsellor 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 to plan their time in such a way as to avoid too much workload.

To avoid physical problems, 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. We follow all required procedures, engage experts and collaborate closely with the employee to find options for recovery and reintegration.

9.4 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 and the termination of the employment contract.

9.5 Recruitment

In our recruitment processes and employment offers, we ensure that we meet legislative requirements in terms of relevant pre-employment checks and data protection, and confidentiality. In our recruitment processes, we will also respect our safeguarding principles (see section 9.1). As an equal opportunity employer striving for a diverse and inclusive workplace, we especially encouraged applicants from a minority background to apply for our vacancies.

9.6 Sustainability

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 GHG emissions. For business travel, travel by air is discouraged inside Europe.

Employees are also expected to save energy and water in the office and limit and separate waste. A policy regarding *Sustainability at the office* is accessible to all Profundo's employees.

10 Compliance with the Code of Conduct

10.1 Responsibility

The director is responsible for ensuring that this Code of Conduct complies with our legal and ethical obligations and that all employees of Profundo comply with it. The office manager is responsible for dealing with any queries on its interpretation.

The Code of Conduct is published on Profundo's website, and all employees are encouraged to comply. All new employees receive training on the Code of Conduct within five weeks.

10.2 Whistleblowing

If there is any suspicion of an employee violating the guidelines in this Code of Conduct, other employees and third parties are encouraged to report this to the director or the office manager. In addition, employees can contact Profundo's external confidential counsellor.

Due to fear of reprisals, Profundo recognises that raising a concern or allegation can be difficult for a staff member to make. 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 to 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 was 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.

10.3 Investigation of allegations

If a concern or allegation about violating this Code of Conduct is brought to the attention of the director, he will discuss the suspicion with the employee(s) involved. If the employee(s) cannot explain their behaviour correctly, they will be found to have violated the guidelines in this CoC. Depending on the seriousness of the violation, the employment or internship contract may be ended following Dutch labour legislation. And the director will decide, after consulting a legal counsellor, if the case should be referred to the local authorities.

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. 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

The accused employee will be reinstated if no violation of this Code of Conduct can be proven. Appropriate efforts will then be made to rebuild trust between the employees to ensure that

Profundo will continue to be a safe, stimulating and pleasant working environment for all employees.

11 Review and updates

This policy 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 done at least once every two years.