

# Integrity Policy

## Purpose

JustdiggIt is committed to maintaining the highest standards of ethics, integrity, and accountability in all aspects of its operations. At the same time, suspicions of misconduct and violations are taken seriously when they occur. This Integrity Policy is established to provide a mechanism for individuals to report concerns, complaints, or instances of wrongdoing, without fear of retaliation.

## Scope

This policy applies to all parties involved with JustdiggIt. It covers any concern related to the following types of violations:

- Abuse of power: corruption, extortion, conflicts of interest, leaking confidential information, attributable negligence;
- Financial: fraud, theft, misuse of provided goods or services, attributable waste;
- Interpersonal: discrimination, intimidation, bullying, unwanted intimacy, violence, humiliation, sexual harassment, sexual violence;
- Professional: attributable negligence.

## Reporting Mechanisms

Reporting (presumed) violations should be confidential and easily accessible. A report of a (presumed) violation can be made in a few ways:

Reporting lines:

- CEO – Marjolein Albers, who can be reached on [marjolein@justdiggIt.org](mailto:marjolein@justdiggIt.org) or +31653930259
- COO – Niels Dierckx, who can be reached on [niels@justdiggIt.org](mailto:niels@justdiggIt.org) or +31640736384
- Member of the Supervisory Board (RvT) – Jos Huijbregts, who can be reached on [integrity\\_sb@justdiggIt.org](mailto:integrity_sb@justdiggIt.org). This reporting line is only if the report concerns the CEO of JustdiggIt or if the reporter believes that their concerns are not adequately addressed internally.

The person who received the report consults the reporter if an official report should be made, advises the person on this, and discusses possible outcomes and consequences. Reporting a (presumed) violation can, in addition to a written submission, initially be done orally. However, the official report is always submitted in writing to the CEO and/or COO or the Member of the Supervisory Board. A written report is signed by the reporter and includes at least:

- the name and position of the reporter;
- the date of the report;
- a description of the (presumed) violation, stating where and when the incident occurred, or a description of the (alleged) violation and possible violators.

## Confidentiality and Non-Retaliation

JustdiggIt is committed to maintaining the confidentiality of individuals who report concerns. Disclosure of the reporter's identity will be limited to those who need to know for the purpose of investigation and resolution.

Retaliation against reporters is strictly prohibited. JustdiggIt will take appropriate actions against any individual found to be retaliating against a reporter. This may include disciplinary action, up to and including termination of employment or contractual relationship.

## False Reporting

Submitting intentionally false or malicious reports is considered a violation of this policy. Individuals found to be making false reports may face disciplinary actions.

## Investigation

Once an official report has been submitted, the person who received it evaluates the report and decides whether an investigation is needed. This person may decide to involve an independent external expert to do the investigation if it is believed that within JustdiggIt, the knowledge and experience regarding conducting such an investigation are insufficient, or the objectivity of conducting the investigation would benefit from it.

During the investigation both the reporter and person who the report is about have the right to be heard.

In case of a criminal offense the police should be involved.

The reporter receives general information about the progress of the investigation (and the outcome), unless the reporter does not wish to be informed or unless there are other valid reasons not to inform the reporter.

The CEO and COO discuss the results of the investigation and, if necessary, inform the Member of the Supervisory Board about the follow-up steps. If the report is made to the Member of the Supervisory Board, the results of the investigation are discussed within the Supervisory Board. The Member of the Supervisory Board informs the CEO about the results and the follow-up steps.

If the concern is found to be substantiated, JustdiggIt will take appropriate corrective actions, which may include disciplinary measures, process improvements, training, or other remedial actions.

## Documentation & publication

All Integrity reports, investigations, and actions taken will be documented and maintained in a digital folder giving access to only the CEO, COO and Head of People & Culture. This documentation may be used for future reference, reporting, or legal purposes.

The annual reports will include a summary of the number of reports/violations, its natures, the handling and a reflection on own integrity policy.

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