

Netherlands Institute for
Multiparty Democracy

Integrity Policy

NIMD

Updated 5 January 2026

PREAMBLE

This policy document comprises the Integrity Policy of the Netherlands Institute for Multiparty Democracy (NIMD). NIMD aims for the highest possible integrity in its contact with partners, suppliers, clients, among employees, and with respect of business property.

The highest possible integrity entails that all NIMD employees behave honourably, even when no one is watching. Honourable behaviour includes honesty, loyalty, respect, and responsibility towards fellow colleagues and work relations. It also means adherence at all times towards internal procedures and policies that guide work processes and thus behaviour in the organization.

However, integrity cannot be introduced by just drawing up a number of rules, guidelines, or a code of conduct. One's attitude and 'wanting to do things properly' are also crucial aspects of integrity.

Apart from the content of this Integrity Policy, NIMD employees are also obliged to comply with applicable legal frameworks, regulations and requirements, and to abide by common social standards and values that are applicable in the country of residence.

This means there are two sides to stimulating and applying integrity in NIMD: a hard and a soft side. The first consists of the formal rules and regulations, both internal (like this policy) and external (like national laws and regulations), while the soft side refers to the organisation's work culture at NIMD and the actual behaviour of employees. In order to set the example, especially also senior leadership and managers need to display exemplary behaviour to other staff.

The key values that are reflected within NIMD staff policies - justice, legal security, safe environment, openness and clarity, individual and shared responsibility, room for initiative, diversity and creativity - also serve as a point of departure for this Integrity Policy.

POLICY DOCUMENT

This Integrity Policy consists of a series of articles that define where integrity is at stake and what is expected behaviour (section I). In addition a specific section on Sexual exploitation, abuse and harassment (SEAH) is presented (section II), followed by descriptions of (internal and external) Confidential Counselling (section III), the Complaints Procedure (section IV), and the Whistleblowing facility (section V).

The scope of Section I, II and III is limited to NIMD employees. Section IV and V have a broader scope and relate to all persons affected by NIMD's work. In which the complaints procedure can only be used if you are personally affected by the complaint. The whistleblowing facility (section V) addresses the reporting of any unwanted behaviour and can be done anonymous.

NIMD's Code of Conduct is annexed to this policy and is used as written agreement between employee and employer in relation to integrity. This Code is signed and agreed by all NIMD employees when signing their contract.

SECTION I – ARTICLES ON INTEGRITY

1. APPLICATION

This policy is integral part of the broader NIMD Integrity Policy, and applies to all staff, including managers and coordinators; full-time or part-time; temporary or permanent; in The Hague or Country Offices (COs); interns; student workers and official volunteers, hereinafter referred to as *employees*.

2. PROFESSIONALISM & COMPLIANCE

Every employee shall discharge the duties entrusted to him/her with the highest degree of professionalism, ownership, integrity and loyalty to NIMD, in accordance with this integral integrity policy.

In addition, every employee shall comply with all internal and external regulations and lawful instructions regarding the work of NIMD given to them by the Executive Director, the relevant Country Director or their line-manager, as the case may be.

3. OTHER POSITIONS

Every employee shall devote their official working hours to the work of NIMD, and may not undertake private or other work activities during these working hours, unless duly authorized to do so by a line manager.

Employees are obliged to communicate their intention to carry out paid or unpaid (but possibly conflicting) work elsewhere and outside of the working hours of the employee, to the employer in writing at least a month in advance of commencement. If this other work presents an issue in respect of the proper execution of the employee's work for NIMD, the employer will deny this opportunity and must, within a month of said communication notify the employee in writing, stating the reasons that the employee is not permitted to perform that other work.

New employees who were already performing other work and who do not terminate that work after being employed by NIMD must communicate that fact to the HR department before signing the employment contract. If this work is conflicting with the NIMD work, the NIMD employment contract cannot be signed.

4. CONFLICT OF INTEREST

No employee shall engage in any business or activity that would undermine their performance or that conflicts with the interests of the organisation.

NIMD shall, as a rule, not enter into agreements with or procure goods or services from employees, supervisory and advisory council members or their direct relatives, apart from in exceptional circumstances where it is demonstrated to be in the best interest of NIMD and no viable alternatives are available.

No employee, including the Executive Director/ Country Director may be involved in any decision-making process, or seek in any way to influence decision making, where they may be in a position to gain privately from the decision or where their relatives are involved.

All employees shall disclose forthwith any potential conflict of interest and seek management approval before proceeding.

5. CULTURAL SENSITIVITY

Work performed in the countries in which NIMD operates, must be carried out with respect for the local culture, structures, laws and customs, insofar as these are not counter to international human rights standards, humanitarian law or NIMD values.

Any dealings with partner organizations must be professional and strictly business-related.

All employees shall act at all times in a manner that enhances the reputation and wellbeing of NIMD as an impartial and independent organization. No employee shall act in a manner that could bring the reputation of NIMD into disrepute or otherwise jeopardise its good standing.

6. ACCEPTING GIFTS AND BENEFITS

Employees are not permitted to accept or demand gifts, remunerations, attendance fees or commissions, whether directly or indirectly, or to accept inheritances or testamentary gifts from persons with whom the employee only comes into contact by virtue of the employee's position.

This applies to (an accumulation of) gifts that is valued to be at least EUR 50,- or the equivalent amount as formally agreed locally in accordance with country contexts. All significant gifts below EUR 50,- must be reported to a line manager.

7. PAYING BRIBES AND OTHER ILLEGAL PAYMENTS

NIMD has a zero tolerance policy towards the acceptance and payment of bribes. This includes, but is not limited to, illegal charges imposed for the release of goods from customs, taxes and fees levied by local authorities in addition to or in excess of the legal maximum or illegal charges imposed by local authorities in exchange for registration, programme approval, and visa or work permits.

Accepting or awarding bribes or illegal payment is a ground for immediate cessation of the employment agreement.

8. CORRUPTION AND FRAUD

NIMD has a zero tolerance policy for any form of corruption, theft, fraud and dishonesty. No employee may falsify information or otherwise provide false information.

An employee who engages in such illegal actions shall be subject to summary dismissal.

An employee who has caused a loss to NIMD through such illegal actions may be held liable for reimbursing the cost of the loss or damage caused.

9. THIRD PARTY INVITATIONS

Invitations by third parties to participate in a sponsored event or (foreign) visit must be reported to the line manager. The manager will determine whether the trip serves a functional purpose, and the invitation may only be accepted if that is the case.

If relevant, travel and accommodation expenses are claimed back by the employee through the normal expense claims procedure.

10. USE OF ORGANIZATION FACILITIES

NIMD property, equipment and other assets may only be used for the work (objectives) of the organization, unless otherwise authorized in writing by the Executive Director, or the first manager in line, as the case may be.

Taking home office supplies or other NIMD property with a (accumulated) value above EUR 20,- without the explicit approval of a director or manager is not permitted and is considered theft.

All employees shall safeguard all NIMD property and materials entrusted to them and exercise utmost care in their use.

11. ALCOHOL AND DRUGS

The personal use of alcohol during office working hours is prohibited, unless this is explicitly authorized by a line-manager, such as during a reception, lunch or dinner.

The employee must be aware of his/her status as a representative. In all cases a responsible attitude toward the use of alcohol is expected. This means the consumption of alcohol during NIMD meetings or business trips should be kept to a minimum, with the guideline of maximizing this to two alcoholic beverages per day.

For a meeting hosted by NIMD where alcohol is served, the responsibility for alcohol consumption lies with the user.

The possession or use of illegal drugs in the territory where the employee is during work for NIMD, or being under the influence of drugs or any other substance that influences behaviour during working hours, such as alcohol, is strictly prohibited.

12. INTERNET, EMAIL, AND DATA

The internet offered in the offices and NIMD email systems are available to employees for business use. This means that they should be used for work-related duties. Limited (occasional and brief) personal use is permitted, provided this does not disrupt normal daily activities and/or the technical infrastructure.

The employee is not permitted to gain unauthorised access to non-public sources on the internet and to visit internet sites that contain pornographic, racist, discriminating, insulting or offensive material. Employees are also not permitted to download and install such content on NIMD ICT equipment.

The employee is not permitted to use the email system for spamming, sending messages of a pornographic,

sexually or otherwise harassing, racist, discriminating, insulting or offensive nature or messages that incite hate and/or violence or may do so.

Content monitoring will only take place in the event of compelling reasons. If an employee is suspected of violating the rules, monitoring may only be performed by the Executive Director for a fixed (short) period and is limited to internet and email traffic data.

When data traffic monitoring has to be performed by IT staff at NIMD, the task must be authorised by the Executive Director. Such a decision clearly indicates when this temporary authorisation ends. An intention to monitor the content of email is communicated in advance to the employee concerned, unless this is not reasonably possible.

If an employee is found to have made unauthorized use of internet or email, they will immediately be called to account by the line manager and corrective measures will be taken, depending on the nature of the abuse.

13. SOCIAL MEDIA

Use of social media during working hours is allowed limitedly, and mainly when this relates to work. Private use of social media should be avoided during working hours. For the use of social media the following applies:

- Realize that the information you put on the internet can be read by everyone (also for example by competitors or opponents of NIMD).
- Never put information on the internet that could cause harm to NIMD.
- Always take into account the privacy settings of communities, blogs etc. We advise you to change these settings and limit the sharing of your information to your familiar circle of friends and to limit your visibility beyond that circle.
- Keep business and private information separate.
- Never place confidential or classified information on the internet.
- Never place internal or classified information on an internet channel without approval.
- If you post something about NIMD on a blog or forum, make sure that your opinion is recognizable as a personal opinion and avoid any impression that it is an official statement of NIMD.
- Do not share confidential or sensitive information about our country offices, customers, partners or suppliers.
- Take into account copyright, quotes or any other legal rights.
- Formulate correctly, do not distort facts, do not make obscene or otherwise insulting remarks.
- Paid ancillary activities by employees on the Internet need permission from a line manager beforehand.

14. INFORMATION

NIMD expects all employees to manage and report their business data and information in a reliable, honest and meticulous manner.

All employees have a duty of confidentiality regarding information that they learn of in their position as employee insofar as such information can be deemed in any manner sensitive. Accordingly every employee shall sign the confidentiality clause in the employment conditions. Any breach of confidentiality will lead to disciplinary action.

Requests from (news) media for NIMD information or on our work should be responded to in close cooperation with the NIMD communications department at HQ.

15. PRIVACY

NIMD and its employees shall handle all privacy-sensitive data from employees, partners and stakeholders in a reliable, honest and meticulous manner, in accordance with internal and legal privacy laws and regulations in the relevant territories (such as the EU GDPR).

Data on employees is only made available as far as there is a professional or legal necessity for it, and only to those persons with a legitimate interest.

16. REPORTING OF MISCONDUCT

All employees have an obligation to report misconduct in or with NIMD, and to do so without fear of reprisal or retribution.

To allow for this, there is the Confidential Counsellor, the Whistleblower Facility and the Complaints procedure, that are also part of this Integrity Policy and that are explained in dedicated sections below. Through these, NIMD commits to protect individuals who report or protest the occurrence of irregularities and malpractices which undermine NIMD's objectives or policies.

17. SEXUAL EXPLOITATION, ABUSE, (SEXUAL) HARASSMENT, DISCRIMINATION, ABUSE OF AUTHORITY

NIMD commits to the highest standards of integrity related to specific misbehavior that falls in the categories of sexual exploitation, abuse and (sexual) harassment, discrimination, or abuse of authority, abbreviated as SEAH. As such, the next section is dedicated specifically to these issues as the SEAH policy, which forms an integral part of this NIMD Integrity Policy.

SECTION II – SEAH POLICY

1. APPLICATION

This policy is integral part of the broader NIMD Integrity Policy, and applies to all staff, including managers and coordinators; full-time or part-time; temporary or permanent; in The Hague or Country Offices (COs); interns; student workers and official volunteers, hereinafter referred to as *employees*.

This policy describes NIMD’s zero tolerance for acts by employees in the conduct of their work anywhere in the world related to: sexual exploitation, (sexual) harassment, violence, aggression, bullying, discrimination, and abuse of authority, summarized under the acronym SEAH.

This Policy complements the articles in NIMD’s Code of Conduct, and clarifies the expected standards of conduct and professional ethics. In particular, it sets clear obligations for NIMD employees to prevent and respond to SEAH and to refrain from condoning, encouraging, participating in, or engaging in SEAH conduct.

2. PRINCIPLES

NIMD, as employer subject to Dutch Law (the Working Conditions Act – *Arbowet*), is not only obliged to implement a policy aimed at preventing workplace harassment and bullying, it also strives to be the best and safest work place environment possible.

NIMD is committed to creating and maintaining a working environment that respects the inherent dignity of all persons, affording them the opportunity to reach their fullest potential and empowering them to deliver the best possible results for NIMD and the people that we work with. Every person working with and for NIMD has the right to be treated with dignity and respectfully at any time and to work within an environment free from any kind of harassment, sexual harassment, abuse and discrimination.

NIMD aims for the highest possible integrity in contact with partners, suppliers, clients, among staff, and in respect of our business property. The key values within the different staff policy – justice, legal security, safe environment, openness and clarity, individual & shared responsibility and room for initiative, diversity and creativity – also serve as a basis for the Integrity Policy in general.

3. DEFINITIONS OF SEAH

This section defines particular behaviour that is referred to in this policy, and which constitutes misbehaviour in line with the zero tolerance approach of NIMD. Any act by NIMD employees that constitutes this behaviour, comprises ‘an act of SEAH’ as described in this policy.

Sexual exploitation

Sexual exploitation is any actual or attempted abuse of position by employees to others based on vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from this sexual purpose.

Sexual abuse

Sexual abuse is the actual or threatened physical intrusion of a sexual nature by employees, whether by

force, or under otherwise unequal or coercive conditions.

Harassment

Harassment is any improper and unwelcome conduct by employees against other persons that causes, or that might reasonably be expected to cause, offence or humiliation. Harassment may be present in the form of words, gestures, electronic communication or other actions that annoy, alarm, abuse, demean, intimidate, belittle, or cause personal humiliation or embarrassment to another, or cause an intimidating, hostile or offensive work environment.

It includes but is not limited to harassment based on any grounds, such as race, religion, colour, creed, ethnic origin, physical attributes, gender identity, or sexual orientation. Harassment will often consist of a series of incidents, but it may be brought about by a single incident only.

The mere expression of disagreement, admonishment, criticism or similar action regarding work performance, conduct or related issues within a supervisory relationship shall not be considered as misbehaviour. Such work-related disagreement is handled within the appropriate work processes whereby advice can be called upon by the internal or external confidential councillor (see section III).

Sexual Harassment (Intimidation)

Any form of verbal, non-verbal or physical behaviour with a sexual connotation that has as its purpose or consequence that a person's dignity is eroded, in particular when a threatening, hostile, insulting, or humiliating situation is created based on the sexual connotation.

Sexual harassment may result in an intimidating, hostile or offensive environment or is made a condition of employment. Sexual harassment normally implies a series of incidents. However, a one-time incident could fall within the definition of sexual harassment if it has an unambiguously offensive sexual character. Staff members with any gender identity can be either the injured party or the offender.

Aggression and violence

Instances where an employee is experiencing physical or mental aggression or threats or attacks under circumstances that are directly related to the employment situation.

Bullying

All forms of intimidating behaviour of a structural nature, perpetrated by one or more employees (colleagues or superiors), aimed at an employee or group of employees that are not in a position to defend themselves against such actions.

Discrimination

Any behaviour where an employee is treated differently from another person that is in a comparable situation, on the basis of their religion, convictions, political outlook, race, gender, nationality, sexual orientation, marital status, age, disability or chronic illness. Or where a seemingly neutral condition, measure, or act unequally affects persons with a given religion, convictions, political outlook, race, gender, nationality, sexual orientation, marital status, age or with a disability or chronic illness.

Abuse of Authority

The improper use of a position of influence, power or authority by employees against another employee, or

external work contact, or a group thereof. This includes situations when the person in question uses their influence, power or authority to arbitrarily influence the career or employment conditions (including, but not limited to, appointment, assignment, contract renewal, performance evaluation or promotion).

Abuse of authority can include a one-time incident or a series of incidents. It may also consist of conduct that creates a hostile or offensive work environment, which includes, but is not limited to, the use of intimidation, threats, blackmail or coercion.

4. PREVENTION

NIMD will ensure that its recruitment, procurement, employment processes adhere to this policy, and includes a SEAH reference check for new colleagues.

NIMD will actively support awareness raising and training activities for and/or in collaboration with persons covered under this Policy, partners, and relevant stakeholders in NIMD-related activities. Already, NIMD is committed to train staff, including mandatory safety and security trainings that are part of this. In these ongoing trainings the topic of SEAH is also addressed, including on how to handle sexual harassment, harassment or abuse of authority in the workplace. In addition, NIMD will ensure that all staff undertake mandatory regular additional training to guarantee compliance with this Policy and relevant operating procedures.

Inspired by the Partos dilemma-based card game, NIMD has developed its own integrity card game tailored to its specific organizational context, featuring real-life scenarios and cases that challenge staff to reflect on and discuss their responses to integrity dilemmas they may face in their own work. The game initiates an open discussion about integrity, and its meaning and application in practice. The aim is to build trust between the participants, to learn from each other and help each other when facing potential difficult dilemmas. It also makes the policy come alive and illustrates the difference from being a paper reality to being applied in practice. The different sorts of SEAH (potential) situations are included in these dilemmas, and the game is therefore a good manner to raise awareness on the subject of SEAH.

For matters pertaining to SEAH, NIMD has an internal and external confidential counselling service in place for employees (see [section III](#)). This can be freely used and with respect for privacy. In addition, a Complaints Procedure and Whistleblowing Facility are in effect and available for any employee or external stakeholder to be used for any integrity issue including SEAH. These are presented in [Section IV](#) and [V](#) respectively.

5. RESPONSIBILITY TO REPORT

NIMD employees have a responsibility to report any suspicion or concern of SEAH. Any individual can raise a concern/complaint to NIMD about an incident they have experienced, witnessed, or heard about concerning an employee or partner (including suppliers, beneficiaries, contractors, etc.) without fear of retribution. The formal mechanisms available for this, next to direct reporting to a line manager, are the Confidential Counsellor, the Complaints Procedure, or the Whistleblowing facility.

Employees shall not investigate allegations or suspicions themselves and should report a case to the mechanisms laid down in this policy.

These are explained in the sections below. Including the follow up on any reporting.

SECTION III: CONFIDENTIAL COUNSELLING

1. WHAT IS A CONFIDENTIAL COUNSELLOR

Every employee has the right to work in a safe and ethical workplace. A Confidential Counsellor is a person available for employees who acts as support line and to stand next to them in case of challenges faced in the work or in the work place. A Confidential Counsellor also acts advisor to the organization on how to be a safe working environment, as all employers are responsible to provide a safe and ethical workplace with specific attention to good social and mental working conditions (Psycho-Social Labour Conditions).

2. NIMD CONFIDENTIAL COUNSELLORS

Within NIMD there are both internal confidential counsellors and an external confidential counsellor. All confidential counsellors are appointed by the Executive Director of NIMD. They are selected based on adequate knowledge and expertise on (preventing and combating) inappropriate conduct and transgressive behaviour. Moreover, an internal confidential counsellor must be trusted by the staff and be easily approachable. The Supervisory Council will be informed about the appointment of confidential counsellors.

3. CONFIDENTIALITY

All interactions of employees with confidential counsellors are treated with the utmost attention to confidentiality and privacy. Only in extreme cases where the confidential counsellor establishes that serious violence and/or sexual abuse and/or criminal conduct is being committed, he/she is not bound by the obligation of confidentiality.

4. DUTIES OF THE CONFIDENTIAL COUNSELLOR

A confidential counsellor:

- is a contact point for people that are confronted with unwanted behaviour in the workplace: sexual intimidation, discrimination, bullying, aggression and violence;
- assists people with complaints dealing with sexual intimidation, discrimination, bullying, aggression and violence and, where necessary, refers them on (to the authorities or another service);
- shall take action in terms of finding a solution to the situation when a complaint is received. Action is only taken at the request of the complainant or with complainant consent;
- provides the complainant with advice, both solicited and unsolicited, on what steps to take next;
- assists, at the complainant's request, to submit a complaint and supports them when it is brought before the complaints board;
- ensures that the complainant is not prejudiced as a result of making the complaint and that the complaint is properly dealt with;
- provides the complaints board and the employer with information and advises them in respect of preventing and combating unwanted behaviour: sexual intimidation, discrimination, bullying, aggression and violence;
- makes sure aftercare is provided to the person who filed a complaint. Providing after-care means to check whether the situation has been improved and whether the victim needs professional help (to overcome the traumatic event);

- releases an annual anonymised report on the nature and scope of the complaints about unwanted behaviour: sexual intimidation, discrimination, bullying, aggression and violence.

5. ACCOUNTABILITY AND PROTECTION OF THE CONFIDENTIAL COUNSELLOR

In performing his/her tasks the confidential counsellor is solely accountable to the employer.

The confidential counsellor is in all other respects independent and enjoys related protections, including confidentiality, protection from retaliation and remedies.

6. CONTACTING CONFIDENTIAL COUNSELLORS

The exact person to contact as employee depends on the location of work. NIMD strives to maintain a network of regional confidential counsellors for employees working in NIMD Country Offices.

For staff in Headquarters (The Hague) the confidential counsellors can be contacted via:

Internal confidential counsellor

Email: confidential@nimd.org

In addition there is a contract with an external counsellor, for those cases deemed too sensitive for the internal counsellor or when employees are more comfortable with an outsider:

External confidential counsellor

Herman van der Wind

h.vanderwind@bezemerschubad.nl

+31 6 12 26 50 99

SECTION IV: COMPLAINTS PROCEDURE

1. APPLICABILITY AND SCOPE

NIMD aims for the highest possible integrity in its contact with partners, suppliers, clients, among employees, and with respect of business property. However, mistakes do happen. To help us learn from our mistakes and improve our performance, we invite you to file any complaint you may have about our service or staff and make suggestions for improvement. Complaints can be made by anyone that feels negatively affected by NIMD's work. As a complaint has a big impact on all involved, this procedure should be used as a last resort. Finding an amical way of settling disputes, giving feedback and receiving this, and addressing issues with line management should be first options to be explored. Of course situations are not always black and white, therefore advice on next steps could be received by our confidential counsellors. The complaint should pertain to the conduct of NIMD as an organization or the functioning of one or multiple individuals related to NIMD.

2. INAPPROPRIATE BEHAVIOR / SEXUAL HARASSMENT

This Complaints Procedure is also designed to deal with inappropriate behaviour - including (sexual) harassment, bullying and retaliatory actions - by NIMD (employees), implementing organizations and service providers (and their employees). But if you don't want NIMD to know about your complaint, you can use our Whistleblower facility, which is for anonymous reports.

If the complaint concerns inappropriate behaviour, including sexual harassment, it will be forwarded to our confidential counsellors. You will be contacted by this confidential counsellor directly after NIMD has received your complaint. The responsibilities of the confidential counsellor are:

- checking if the complainant is in need of mental or physical support, and if so organizing this
- giving advice on how to start a complaints procedure
- providing guidance on the complaints procedure

3. CONFIDENTIALITY

Any person that is acting within the context of the complaints procedure is obliged to maintain confidentiality in regard of that knowledge and the confidential information that they have received in that respect.

Information that identifies individuals involved in a complaint will be limited to essential personnel and will not be shared further without obtaining the informed consent of those involved, except if someone's life is at risk, a child is at risk, or as required by law in consultation with legal counsel and where safe to do so. Non-identifying information will be shared only as per reporting requirements

4. DEFINITIONS LINKED TO THE COMPLAINTS PROCEDURE:

| | |
|---------------------------|--|
| Employer | Netherlands Institute of Multiparty Democracy (NIMD) |
| Employee | All persons with an NIMD contract |
| Complainant | A person who makes a complaint |
| Complainee/Defendant | A person linked to NIMD, who is complained about. |
| Confidential counsellor | A person made available by the employer who can be trusted and addressed on private, sensitive or secret matters relating to integrity issues. |
| Internal complaints board | A representation of NIMD staff, not involved in or affected by the specific complaint issue, who assesses the initial merit of the complaint and decides on follow-up action including the setting up of an external complaints board (see below). Normally at least one MT members is in the internal complaints board. |
| External complaints board | An official group of people (not employed by NIMD) who have been tasked with evaluating and ruling on a complaint relating to specifically to integrity issues. |

5. RIGHT OF COMPLAINT

Every person who is confronted or could be confronted with inappropriate conduct within a work situation or as a result thereof can, whether or not through a confidential counsellor, submit a complaint;

A complainant may not be prejudiced in his/her work or position within the company on the grounds of submitting a complaint of discrimination or other inappropriate conduct. Witnesses must also be protected and may not be prejudiced by virtue of giving testimony.

6. HOW TO FILE A COMPLAINT

Please e-mail your complaint (or suggestion) to complaints@nimd.org. This email in box is managed by Executive Director and the Head of Finance, Compliance and Support. If you do have a complaint about the Head of Finance, Compliance and Support, you can email your complaint directly to our Executive Director (tijmenrooseboom@nimd.org).

Please try to include as much as possible of the following information in the email:

- Name, address , function, workplace complainant;
- Name, function, workplace subject of complaint;
- Description relationship of authority;
- Description complaint and date;
- Evidence/witness;
- Steps already been taken.

NIMD only accepts complaints submitted within 6 months after the event concerned. Within two weeks, you will receive written confirmation of receipt and information on the next steps.

If you are not satisfied with the solution, you may re-submit the complaint to higher NIMD management levels. If the issue cannot be resolved by NIMD, you can turn to the Partos Complaints Committee (a body for Dutch organizations working in international development).

7. (EXTERNAL) COMPLAINTS BOARD

In case of a complaint a (technical) assessment is done by the Executive Director and the Head of Finance, Compliance and Support to assess the initial merit of the complaint and decides on follow-up actions, including the possible setting up of an (external) complaints board. This board will consist of persons not involved in or affected by the specific complaint issue.

In some cases an external complaints board is created. This board is an independent board that can be called upon when it comes to complaints involving forms of inappropriate behaviour, which not can be handled internally. In the office in The Hague, in the following cases an (external) complaints board will **always** be setup:

- Sexual harassment
- Aggression and violence
- Bullying
- Discrimination

In case the complainant feels an (external) complaints board should be installed and the internal assessment indicated this is not needed, you can turn to the Partos Complaints Committee (a body for Dutch organizations working in international development).

General

- The complaints board consists of at least three members: the chairperson and two others.
- The chairperson and the other members are appointed by the employer (in some cases at the nomination of the Employee Representation (PvT)).
- The board must have legal expertise (an external expert can also be a member of the board, or can be engaged on an ad hoc basis);
- The board members must deal with the complaint in an unprejudiced and unbiased manner.

Tasks of the complaints board

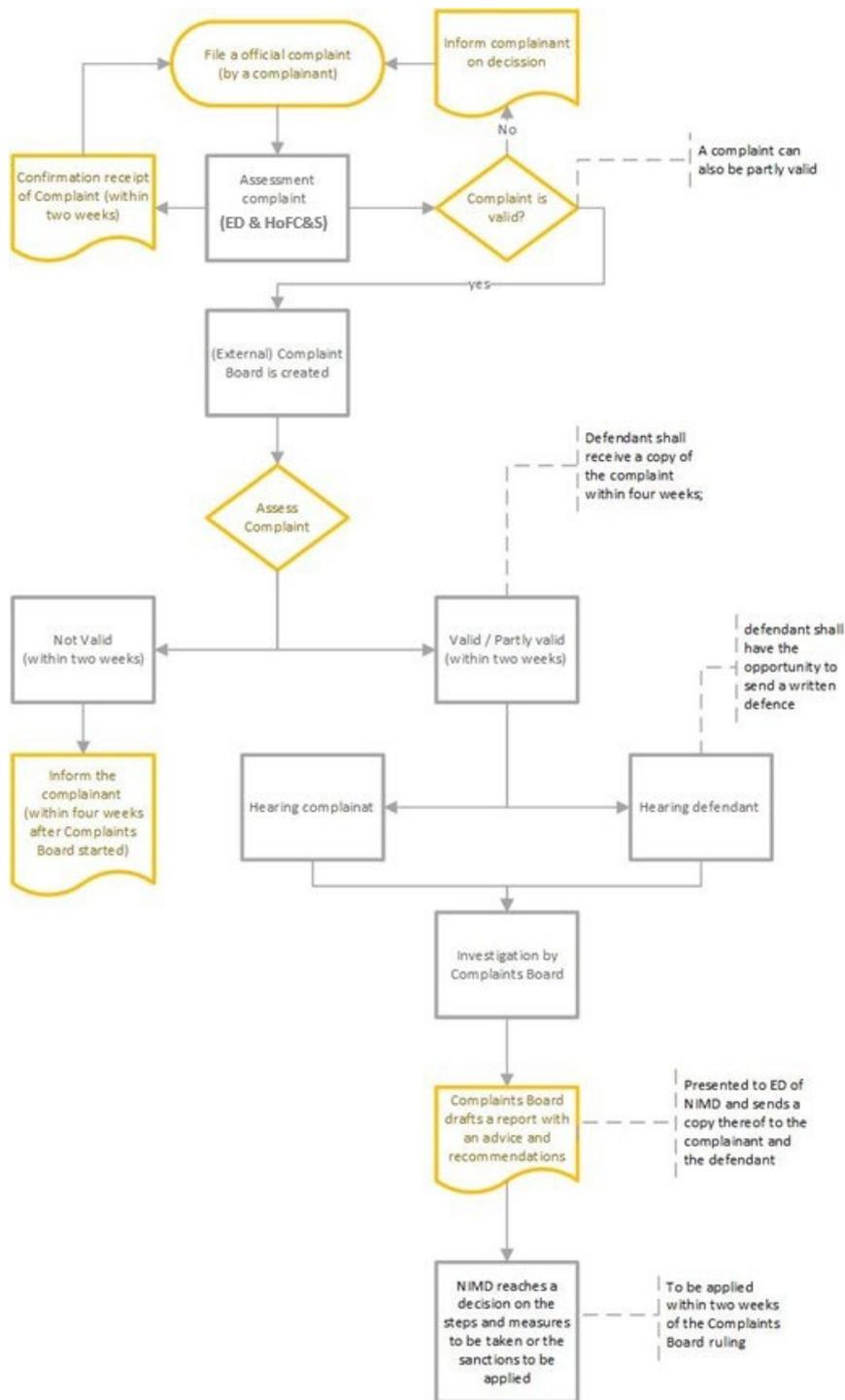
- The complaints board deals with the complaint concerning inappropriate conduct: sexual intimidation, discrimination, bullying, aggression and violence;
- The complaints board institutes a preliminary investigation into whether the complaint has grounds;
- The complaints board registers the nature and the extent of the complaints received and annually releases an anonymised report.

8. COMPLAINTS PROCEDURE

- The complaint is submitted in writing to the above mentioned email address (where necessary, with the assistance of the confidential counsellor);

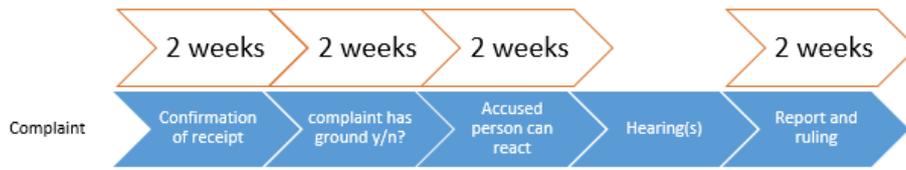
- The notice of complaint/application contains: the name of the complainant, the name of the defendant , a description of the complaint, the measures taken to date by the complainant, and the documents (evidence) related to the complaint.
- The Executive Director and the Head of Finance, Compliance and Support assess the initial merit of the complaint.
- The complainant will receive confirmation that the complaint was received within two weeks;
- If there is reason to do so, the complaint can be submitted by more than one person, but they must be affected parties in respect of the complaint;
- If the complaint is declared groundless, the Executive Director and the Head of Finance, Compliance & Support shall inform the complainant within four weeks;
- If it is found that the complaint has grounds a complaints board will be formed. The complaints board will assess the complaint once more.
- The defendant shall receive a copy of the complaint within four weeks;
- The defendant shall have the opportunity to send a written defence to the board within two weeks of receiving the complaint;
- Both the complainant and the defendant are interviewed by the board. The complainant and the defendant are interviewed in each other's presence, unless the board has well-founded reasons for interviewing them separately;
- The board is also authorised to interview other parties. Every person that falls under the scope of the code of conduct must respond to the board's request for an interview;
- The board compiles a report of every hearing and sends it to the complainant/ defendant within two weeks of that session as well as to other persons that were interviewed; the complainant and the defendant have the opportunity to voice to the board their opinion of the report at a session to which the complainant and the defendant are invited. These sessions are conducted separately.
- Once they are approved by the complainant or the defendant , the other party is given the opportunity to read the reports. The reports are not handed over to the parties.
- The board's sessions are held in camera;
- The board rules, providing reasons, on the grounds of the complaint within two months of receiving the complaint. The board can extend that period by four weeks, after informing the complainant and the defendant accused of that extension. The board can provide advice and recommendations in its ruling on the measures to be taken;
- The complaints board presents its report together with its ruling to the Director of NIMD and sends a copy thereof to the complainant and the defendant ; In case the defendant is the Director, the report with its ruling will be send to the Supervisory Council;
- The board sends a copy of the ruling to the parties concerned;
- The party ultimately responsible (the employer) reaches a decision on the steps and measures to be taken or the sanctions to be applied within two weeks of the board's ruling.

Annex I: Overview Complaints procedure NIMD:



Timeline:

Version 5.0
 Process owner: Head of Finance, Compliance and Support
 Approved by: ED
 Date of approval: 5 January 2026
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SECTION V: WHISTLEBLOWING FACILITY

WHISTLEBLOWING

Any person who reports, attempts to report, is believed to be about to report, or is believed to have reported actual or suspected case of SEAH in NIMD-related activities is deemed a whistleblower. The whistleblower may or may not be directly affected by the case of SEAH (victim).

Any person who cooperates, attempts to cooperate, is believed to be about to cooperate, or is believed to have cooperated with a NIMD investigation concerning a case of SEAH, will be deemed a witness.

All whistleblowers, witnesses, and persons directly affected by a case of SEAH (victims) are entitled to the all related protections, including anonymity and confidentiality, protection from retaliation and remedies, as set out in the Whistleblowing facility in section V.

Retaliation acts in breach of NIMD's Integrity Policy against an actual or suspected SEAH victim, whistleblower or witness will amount to the establishment of gross misconduct and a breach of contract. As such, this will be subject to disciplinary or other remedial measures, including direct cessation of contract, also guided by other relevant NIMD policies, rules, and procedures.

NIMD seeks to attain the highest possible levels of (financial) management and accountability. The organisation has adopted a zero-tolerance policy towards for example any form of corruption or fraud. This is why NIMD has adopted a range of proactive measures to prevent and deter acts of corruption or fraud among its staff and staff of implementing partners, beneficiaries and service providers.

All staff are required to observe the highest standards of business and personal ethics when performing their duties and responsibilities. They are expected to be honest and maintain integrity in fulfilling their responsibilities and comply in full with all applicable laws and regulations.

This whistleblowing facility is an important element for detecting dangerous, immoral or illegal practices and is consequently considered an essential component for achieving good corporate governance.

As part of our good governance practices, NIMD undertakes to protect individuals against disadvantage who wish to report or protest the occurrence of irregularities and malpractices that undermine the objectives of the organisation. NIMD employees are explicitly asked to report any suspected violations. Unless such is not deemed possible or advisable, complaints should first be submitted in writing to their immediate superior before employing the whistleblowing procedure. The staff of implementing partners, beneficiaries and service providers are encouraged to report violations or suspected violations initially to their regular contact person at NIMD before using the whistleblowing procedure to report the matter, unless they believe this will endanger them.

The superior or regular contact person ensures that the Executive Director or Country Representative is immediately notified of the reported suspected misuse. If the Executive Director or Country Representative is the subject of the report, the superior or regular contact person can submit his/her report to the Supervisory Board.

All reports received regarding irregularities at partner organisations funded by NIMD or at service providers will be handled in accordance with the provisions of the NIMD sanctions procedure, where applicable.

WHAT IS WHISTLEBLOWING?

Under this procedure, 'whistleblowing' is defined as NIMD employees (both in The Hague and in country offices) and the staff of implementing partners, beneficiaries and service providers reporting dangerous, immoral or illegal practices which take place under the responsibility of NIMD. The public interest is at issue in these cases. Therefore the aim of this procedure is to encourage employees and others who have serious concerns about any aspect of NIMD's work to come forward and voice those concerns.

Employees are often the first to realise that there may be something seriously wrong within the organisation. Whistleblowing is viewed by NIMD as a positive act that can make a valuable contribution to NIMD's efficiency and long-term success. NIMD is committed to achieving the highest possible standards of service and the highest possible ethical standards in public life and in everything the organisation does. To help achieve these standards it encourages freedom of speech.

If you are considering raising any concerns, please read this procedure first. It explains:

- the type of issues that can be raised
- how the person raising a concern will be protected from victimisation and harassment
- how to raise a concern, and
- what NIMD will do to follow up on a complaint

If you are unsure whether to use this procedure or want independent advice at any stage, you may contact the confidential counsellor (confidential@nimd.org) or write directly to whistle-blower@nimd.org.

AIMS OF THE FACILITY

This facility is designed to ensure that you can raise your concerns about wrongdoing or malpractice within NIMD without fear of victimisation, subsequent discrimination, disadvantageous treatment or dismissal.

It is also intended to encourage and enable you to raise serious concerns **within** NIMD rather than ignoring a problem or 'blowing the whistle' concerning such issues to other parties.

This facility aims to:

- Encourage you to feel confident in raising serious concerns at the earliest opportunity and to question and act upon concerns about practices.
- Provide a safe channel for you to raise those concerns and receive feedback on any action taken.
- Ensure that you receive a response to your concerns and that you are aware of how to pursue them if you are not satisfied.
- Reassure you that you will be protected from possible reprisals or victimisation if you have made any disclosures in good faith.

SCOPE OF THE WHISTLEBLOWING FACILITY

This facility is intended to enable those who become aware of any wrongdoing at NIMD that impacts on

another person or service, to report their concerns at the earliest opportunity so that they can be properly investigated.

The Whistleblowing Facility is not intended to replace existing procedures:

- If your concern relates to your own treatment as an employee, you should raise it under the existing complaints procedure (see above)
- If a client has a concern about services provided to him/her, it should be submitted as a complaint to NIMD

WHO CAN RAISE CONCERNS UNDER THIS PROCEDURE?

The procedure applies to all:

- employees of NIMD
- employees of contractors working for NIMD, such as consultants
- employees of suppliers
- those providing services under a contract or other agreement with NIMD in their own premises, such as country offices or democracy schools

WHAT SHOULD BE REPORTED?

Any serious concerns that you have about service provision or the conduct of officers or members of NIMD or others acting on behalf of NIMD that:

- make you feel uncomfortable in terms of established standards;
- fall below established standards of practice; or
- are improper behaviour.

These might relate to:

- conduct which is an offence or a breach of the law (a criminal offence has been committed or a party fails to comply with any other legal obligation)
- disclosures related to miscarriages of justice
- racial, sexual, disability or any other form of discrimination
- health and safety of the public and/or other employees
- environmental degradation
- unauthorised use of public funds or other assets
- possible fraud and corruption
- neglect or abuse of clients, or
- other unethical conduct

This list is not exhaustive.

YOUR LEGAL RIGHTS AS NIMD EMPLOYEE

This procedure has been written with due regard for the The Whistleblowers Authority Act of 1 July 2016 (the Act), which protects employees of NIMD making disclosures about specific matters of concern, when those disclosures are made in accordance with the Act's provisions and in the public interest.

The Act makes it unlawful for NIMD to dismiss anyone or allow them to be victimised because they have made an appropriate lawful disclosure in accordance with the Act.

On rare occasions, a case might arise in which the employee reporting has also participated in the action causing concern. In such a case it is in the employee's interest to come clean as soon as possible. NIMD cannot undertake, that is, shall take no action against such an employee, but the fact that the individual came forward may be taken into account.

HARASSMENT OR VICTIMISATION

NIMD is committed to good practices and high standards and to being supportive of you as an employee or an individual associated with NIMD in any other manner.

NIMD recognises that the decision to report a concern can be a difficult one to make. If you honestly and reasonably believe that what you are saying is true, you should have nothing to fear because you will be doing your duty to your employer, your colleagues and those for whom you are providing a service.

NIMD will not tolerate any harassment or victimisation of a whistleblower (including informal pressure) and will take appropriate action to protect you against any disadvantage when you raise a concern in good faith and will treat such harassment as a serious disciplinary offence that will be dealt with under the disciplinary rules and procedure.

SUPPORT FOR THE WHISTLEBLOWER

Throughout this process:

- you will be given full support from senior management (in case the matter is related to the Executive Director, the support will be provided by the supervisory council).
- your concerns will be taken seriously, and
- NIMD will do all it can to assist you throughout the investigation

If appropriate, NIMD will consider temporarily redeploying you for the period of the investigation.

For those who are not NIMD employees, NIMD will endeavour to provide appropriate advice and support wherever possible.

CONFIDENTIALITY

All concerns will be dealt with confidentially and every effort will be made to not reveal your identity, should you wish it to remain confidential. If disciplinary or other proceedings follow the investigation, it may not be possible to take action as a result of your disclosure without your assistance, so you may be asked to come forward as a witness. If you agree to this, you will be offered advice and support.

ANONYMOUS ALLEGATIONS

This procedure encourages you to put your name to your allegations whenever possible. If you do not tell us who you are it will be much more difficult for us to protect you or to give you feedback. This procedure is not suited to concerns raised anonymously. Concerns expressed anonymously are much less effective, but they may still be reviewed, at the discretion of NIMD.

In exercising this discretion, the factors to be taken into account include:

- the seriousness of the issue raised
- the credibility of the concern, and
- the likelihood of confirming the allegation from other sources

For the formal reporting of suspected irregularities, NIMD makes use of a unique email address: whistleblower@nimd.org. This email address is accessible for the Leadership Team of NIMD and will be monitored by the Head of Finance, Compliance & Support. If needed, information can be shared with stakeholders and employees as well as in programme and project contracts.

FALSE ALLEGATIONS

If you make an allegation in good faith and reasonably believe it to be true, but it is not confirmed by the investigation, NIMD will recognise your concern and there will be no further consequences for you. If, however, you make an allegation frivolously, maliciously or for personal gain, appropriate action, including disciplinary action, may be taken.

WHO SHOULD YOU RAISE YOUR CONCERN WITH?

This will depend on the seriousness and sensitivity of the issues involved and who is suspected of wrongdoing. Under normal conditions, you can raise your concerns with:

- Your line manager
- A Leadership Team member
- A contact person within NIMD
- Or use the whistleblower email address listed above

If, under exceptional circumstances, your concern relates to the Executive Director of NIMD, then it should be raised with the Supervisory Council, which will decide on how the investigation will proceed. This may include an external investigation.

If you are unsure who to contact, you may contact the confidential counsellor at: confidential@nimd.org

HOW TO RAISE A CONCERN

You may raise your concern by telephone, in person or in writing. The earlier you raise your concern, the easier it is to take action. You will need to provide the following information:

- the nature of your concern and why you believe it to be true
- the background and history of the concern (giving relevant dates)

Although you are not expected to prove beyond doubt that your suspicion is true, you will need to demonstrate to the person you contact that you have a genuine concern relating to suspected wrongdoing or malpractice within NIMD and that there are reasonable grounds for your concern.

You may wish to consider discussing your concern with a colleague first. You may find it easier to raise the matter if there are two or more of you who have had the same experience or concerns.

You may invite your trade union, professional association representative or a friend to be present for support during any meetings or interviews in connection with the concerns you have raised.

WHAT NIMD WILL DO

NIMD will respond to your concerns as quickly as possible. Remember that the investigation of your concerns is not the same as either accepting or rejecting them.

The overriding principle for NIMD will be that of the public interest. In order to be fair to all employees, including those who may be wrongly or erroneously accused, initial inquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take.

The investigation may need to be carried out under terms of strict confidentiality, i.e. by not informing the subject of the complaint until it becomes necessary to do so or if such becomes necessary. In certain cases, however, such as allegations of ill-treatment of others, immediate suspension from work may have to be considered. Protection of others is paramount in all cases.

Where appropriate, the matters raised may:

- be investigated by management, an internal auditor, or through the disciplinary/grievance process
- be referred to the police
- be referred to the external auditor
- be referred to and subjected to established child protection/abuse procedures
- form the subject of an independent inquiry

Within ten working days of a concern being raised, the person investigating your concern will write to you:

- acknowledging that the concern has been received
- indicating how NIMD proposes to deal with the matter
- supplying you with information on staff support mechanisms
- telling you whether further investigation will take place and if not, why not.

The level of contact between you and the officers considering the issues will depend on the nature of the matters raised, the potential difficulties involved and the clarity of your information. It is likely that you will be interviewed to ensure that your disclosure is fully understood.

Any meeting can be arranged away from your workplace, if you wish, and a union or professional association representative or a friend may accompany you to provide support.

NIMD will do what it can to minimise any difficulties that you may experience as a result of raising a concern. For instance, if you are asked to give evidence in criminal or disciplinary proceedings, NIMD will arrange for you to receive appropriate advice and support.

It is our task to assure you that your disclosure has been properly addressed. Unless there are any legal reasons why this cannot be done, you will be kept informed of the progress and outcome of any investigation.

THE RESPONSIBLE OFFICER

The Head of Finance Compliance & Support has overall responsibility for the maintenance and execution of this procedure.

HOW THE MATTER CAN BE TAKEN FURTHER

This procedure is intended to provide you with a way to raise concerns within NIMD. NIMD hopes you will be satisfied with any action taken. If you are not satisfied, and you feel it is appropriate, you can take the matter to parties outside of NIMD.

This procedure **does not** prevent you from seeking legal advice yourself.