

Bijlage III Ethische code TWR International

ETHICS POLICY

Purpose

In line with the organization's Core Values and Statement of Faith TWR is committed to upholding the highest standards of integrity, honesty, transparency and Christian conduct. TWR's Core Values require all Salaried Staff (full-time or part-time), Supported Staff (short-term or long-term), Seconded Staff, Interns, Volunteers, Retirees, and Board members (herein referred to as Personnel) to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As representatives of the organization, all Personnel must practice honesty and integrity in fulfilling their responsibilities, and comply with all applicable laws and regulations. The following procedures have been set in place to ensure that any conduct inconsistent with the values noted above shall be thoroughly investigated and addressed.

Definition of Gross Misconduct

Conduct inconsistent with TWR's Core Values is referred to as "misconduct." Significant or recurring instances of misconduct will be considered "gross misconduct." Personnel may be summarily dismissed when his/her behavior destroys a relationship of trust and confidence, making further performance of his/her duties and responsibilities ineffective. Disciplinary action arising from gross misconduct may warrant immediate dismissal for which there is no requirement to serve notice or pay money in lieu of notice.

Examples of Gross Misconduct include:

- Theft or other misappropriation of assets or funds, including those of TWR, donors, broadcasters, suppliers or others with whom TWR has a professional relationship
- Intentional misstatements and other irregularities in organization records
- Forgery or other alteration of documents
- Intentional destruction of organization records against record retention policies
- Fraud and other unlawful acts
- Being under the influence of illegal substances
- Fighting or other forms of violent behavior
- Malicious damage to TWR property
- Behavior likely to bring TWR into disrepute or legal action
- Flagrant disregard for safety procedures
- Unauthorized disclosure of confidential information
- Serious insubordination
- Sexual misconduct

Listed above are examples. This is not intended to be an exhaustive list.

Should dismissal procedures be required, management will adhere to local employment laws.

Scope

All TWR Personnel have an obligation to immediately report suspected misconduct (hereinafter collectively referred to as Concerns) in accordance with this Ethics Policy.

Policy

1. Reporting Concerns

Personnel are encouraged to first discuss their Concerns with their regional leadership. If, after speaking with his/her regional leadership or Human Resources (HR) Director, the individual continues to have reasonable grounds to believe the Concern is unresolved, the individual should report the Concern to the Internal Auditor. If the individual is uncomfortable speaking with regional leadership, or if regional leaders are the subject of the Concern, the individual should report his/her Concern directly to the Internal Auditor.

2. Authority of Internal Auditor Regarding Reporting Concerns

[For TWR NL: See “Veiligheidsbeleid TWR” who to contact in case of integrity concerns. It is advised to contact first own manager and responsible officers before using the whistleblower facility]

3. Handling of Reported Violations

The Internal Auditor is required to address all Concerns reported directly to him. The Internal Auditor will notify the sender and acknowledge receipt of the Concern within five business days. (If he is away from the office when the Concern is submitted, he will acknowledge receipt within five business days of his return to the office.) It will not be possible to acknowledge receipt of anonymously submitted Concerns.

All reports will be promptly investigated by the Internal Auditor. The Internal Auditor may engage legal counsel for Concerns regarding potential violations of law, and will coordinate with the Chief Personnel Officer regarding Human Resources matters.

To the extent the investigation substantiates an ethics violation, appropriate corrective action will be recommended to the President and CFO (and to the Board of Directors, if merited). In addition, the Internal Auditor will follow-up with the complaint to bring closure to the Concern.

The President and/or Board of Directors has the authority to retain outside legal counsel, accountants, private investigators or any other resource to conduct a full and complete investigation of the allegations, if such an expanded investigation is deemed necessary.

4. No Retaliation

This Ethics Policy is intended to encourage and enable all Personnel to raise Concerns within the organization for investigation and appropriate action. With this goal in mind, no individual(s) who, in good faith, reports a Concern shall be subject to retaliation or adverse employment consequences. Moreover, TWR Personnel who retaliate against someone who has reported a Concern in good faith is subject to discipline up to and including reassignment from their position or termination of employment.

5. Acting in Good Faith

Good faith is defined as the reasonable belief that the allegation is substantially true and that it is not made for personal gain. The act of making allegations that prove to be unsubstantiated, and that prove to have been made maliciously, recklessly, or with the foreknowledge that the allegations are false will be considered gross misconduct and may result in discipline, up to and including dismissal from the position or termination of employment. Such conduct may also give rise to other actions, including civil lawsuits.

6. Confidentiality

Reports of Concerns, and investigations pertaining thereto, shall be kept confidential to the extent possible, to protect both the person(s) reporting the Concerns and the person(s) accused in the Concerns. In the conduct of the investigation the accused will be informed of the Concerns, but the person reporting the Concern will remain confidential.

During the investigation the accused will be given the opportunity to provide his/her perspective on the Concerns.

The documentation associated with each Concern will be destroyed within two months of the conclusion of the investigation and related actions. In the event of disciplinary or corrective action, documentation will be maintained in the employee's file to the extent required.

Disclosure of reports of Concerns to individuals not involved in the investigation will be considered gross misconduct and may result in discipline, up to and including termination of employment. Such conduct may also give rise to other actions, including civil lawsuits.