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| Type of document: | Policy | |
| Title of Document: | Policy Enforcement Procedure | |
| Document ID (name-version-year) | PEP.1.2021 | |
| Date of Issue/Update: (mm/dd/yyyy) | Created: 12/21/2021 Last reviewed and/or updated: | Version: 1 |
| Approved by: | Executive Director | 12/23/2021 |
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| Related documents: | n/a | |

H. de Groot
Executive Director



Policy enforcement procedure

ARTICLE 1 NEW POLICIES

1. The decision to write new policies can be initiated by the Supervisory Board (SB) or Executive Director who can be advised by the Staff Council (SC), all mentioning the reason, objectives, and necessary timeline.
2. The drafting is initiated by the Executive Director who oversees the process and quality of the draft that is first sent to the SC for review.
3. In exceptional cases the Executive Director may ask all staff to review a draft policy for internal discussion.
4. Drafts will pass the SC and/or SB for advice and endorsement depending on the subject.
5. Endorsement of policies are recorded in the minutes of SB, Management Team (MT), and SC meetings.

ARTICLE 2 PUBLICATION

1. All WASTE policies are openly available on the website and intranet. Updates will be communicated to all WASTE staff.
2. Newly recruited staff will receive the fraud policy and code of conduct as part of the onboarding program. WASTE publishes its policies on the website to ensure transparency and accountability within four weeks after endorsement.
3. Relevant policies are mentioned in all funding agreements for partner organizations including a link to the full document.
4. The consultants commissioned by WASTE and its suppliers will receive the Code of Conduct as part of their introduction to WASTE.

ARTICLE 3 ENFORCEMENT AND RENEWAL

1. New staff and consultants working for WASTE will be offered a compulsory onboarding program to familiarize them with all policies, reporting systems, and core intellectual properties.
2. All staff members and consultants working for WASTE are expected to be familiar with the WASTE policies, in particular the Code of Conduct and given the opportunity to ask for clarification while starting their employment.
3. Once a year WASTE provides a workshop for all staff and WASTE Coop members to:
 - Refresh policy competence and awareness amongst staff and consultants.
 - Review and discuss the policies.
 - Create a common ownership over WASTE policies.
 - Update policies if necessary.



4. All policies are reviewed and formally renewed annually before January 15.
5. WASTE staff and WASTE coop members need to be transparent about their secondary occupation to avoid any potential conflict of interest during recruitment and employment.
6. WASTE staff are obliged to inform the Executive Director immediately about any occupation, assignments, and voluntary work conducted externally which could be seen as a conflict of interest.

ARTICLE 4 REPORTING FRAUD AND ANTI-CORRUPTION

WASTE uses the following definition of fraud: fraud is any intentional act or omission that is conducted to deceive others resulting in the victim suffering a loss and/or the perpetrator achieving a gain, usually monetary. There are three general types of frauds: corruption, asset and cash misappropriation and financial statement fraud.

- **Corruption** refers to schemes in which fraudsters use their influence in business transactions violating their duty to their employer in order to obtain a benefit for themselves or someone else.
- **Asset misappropriation** schemes are frauds in which the perpetrator steals or misuses WASTE resources.
- **Financial statement fraud** involves the intentional misstatement or omission of material information from the organization's financial reports; also described as "cooking the books or figures".

Staff, consultants, and partner organizations:

1. Are encouraged to report any suspicious incident.
2. Who step forward to report any irregularities are protected against any reprisal by the MT and her/his direct supervisor. A report of (alleged) fraud will never have negative effect on the person reporting.
3. Suspicious of fraud should report to the Executive Director who will coordinate all follow up actions.
4. Are ensured that the Executive Director will keep all cases strictly confidential and may guide concerned staff to appropriate persons when further help is required.
5. Are ensured that investigation results will not be disclosed or discussed with anyone other than those who have a legitimate right to know.
6. Must be aware that the Executive Director maintains a **fraud register**. Periodic updates on the ongoing investigations are discussed in the MT. The Executive Director receives all updates on the progress of investigations in order to maintain complete documentation. Fraud is reported to the external auditor and to the Supervisory Board. The fraud register is also regularly examined by the external auditor.



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7. Using Whistle blower policy (see annex) can report directly to the chairperson of the Supervisory Board who decides the next course of action.

ARTICLE 5 COMPLAINTS ABOUT MISCONDUCT, SEXUAL HARASSMENT, INTIMIDATION, AND VIOLENCE

WASTE has an **Ethics Committee** that consist of an internal trust person who is nominated by the Staff Council, the Executive Director of WASTE, and an external trust person. They are all available to provide advice and will accept any reports of possible misconduct.

Any employees or members of our extended workforce (volunteers, interns, vendors, and independent contractors) who are assigned to perform work or services for WASTE or its partners are expected not to tolerate any inappropriate behaviour.

When you are confronted with or knowledgeable about misconduct you may:

1. Firstly, challenge the colleague involved and asking him/her to stop the behaviour.
2. Secondly, report the issue to your manager or Executive Director (see complaints reporting procedure below)
3. In case of a serious misconduct including dangerous or illegal behaviour, you always report this to your manager or Executive Director immediately.
4. At any stage in the process seek advice from the internal confidant or external counsellor.
5. When you suspect a possible wrongdoing within WASTE that involves legally punishable acts of behaviour and is based on reasonable suspicion, first seek confidential advice from the Supervisory Board. In case the Board does not satisfactorily deal with your complaint you can contact the Dutch Whistle blowers Authority advies@huisvoorklokkeluiders.nl.



ARTICLE 6 COMPLAINTS REPORTING PROCEDURE

1. Reporting a complaint

- Complaints should be reported verbally or in writing to the direct manager. (S)He may decide to involve the Executive Director.
- The direct manager or Executive Director will review complaints as quickly as possible and clarify the problem with the employee.
- They document the complaint in writing identifying areas of concern and any witnesses. All complaints will be dealt with confidentially.

2. Informal problem solving

- When appropriate, the complainant will be asked if the problem can be solved informally.
- The Executive Director initiates a formal investigation by the Ethics Committee when the direct manager, Executive Director, or the complainant do not think the issue can be solved informally.
- The Executive Director makes the complainant aware of the next steps.

3. Investigation

- The Ethics Committee informs the complainant at all stages, so it is clear how everything is being handled and what to expect next.
- The Ethics Committee investigates all information regarding the complaint; this may include statements from everyone involved.

4. Problem solving meeting

- The Ethics Committee arranges a meeting with the complainant and the Executive Director after the investigation is finished.
- The Ethics Committee informs the employee and Executive Director of the outcome of the investigation.
- The Ethics Committee makes sure that the complaint is discussed objectively and initiates a problem-solving approach.
- Thereafter, the Ethics Committee shares the minutes of the meeting with all recommendations listed.
- The Ethic Committee may advise the complainant of any recommendations but does not discuss any disciplinary action that has been taken against any other person.
- The advice by the Ethics Committee is to be followed up by the Executive Director and can only be deviated from with proper reasoning that is communicated with the Supervisory Board.



5. Appeal

- WASTE believes that complaints can best be solved in a respectful setting with an agreed outcome leaving both the complainant and the organisation satisfied.
- If the complainant feels the outcome of the complaint procedure is sufficient, (s)he can appeal in writing to the Supervisory Board of WASTE. It is not legally necessary to give a reason for the appeal.
- The appeal hearing should have a member of the Supervisory Board involved. The complainant has the right to be accompanied during this meeting.
- The complainant is made aware of the outcome in writing after the meeting.

ARTICLE 7 SANCTIONS

An investigation will be implemented in case of suspected fraud or any breach of the Code of Conduct. If the findings reveal fraudulent acts, sanctions can be imposed for two purposes:

- **Disciplinary reasons:** demonstrating that corruption is not tolerated and has consequences; sanctions support prevention; enforce compliance with signed agreements.
- **Mitigation:** reducing the effect of non-compliance regarding the implementation of the programme in question and other programmes (with respect to financing, reputation, and security).

The following actions are taken if the investigation (see under complaints) confirms any corruption:

- Dismissal of the personnel involved.
- Corruption reported to the local police (if possible).
- WASTE communication officer informed for further appropriate action.

Fraud committed by consultant

- In the event of fraud committed by a consultant, WASTE will cancel all payments and seek annulment of the contract.
- The consultant will be blacklisted to prevent him or her from being assigned to any missions in the future. Legal action will be taken if deemed appropriate.
- WASTE will always take the interests of its ultimate beneficiaries into consideration when sanctions are imposed.

Fraud committed by staff

- In the event of fraud committed by WASTE staff or WASTE Coop members, the Executive Director decides on the actions to be taken in consultation with the manager.



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- Any failure to comply with prior agreements will be confirmed in writing. Any disciplinary action depends on the nature of the unwanted act and includes a written warning or dismissal, and legal action.

Conditions for the continuation of the relationship with a partner organisation or supplier

The conditions laid down by WASTE for the continuation of the relationship include:

- The extent of the damage has been established by WASTE or a third party, and action has been taken accordingly by the implementing partner/supplier.
- Compensation for the damage sustained.
- The matter is reported to the police by the implementing partner/supplier directly.
- The implementing partner/supplier noticeably improved the internal organization/control.
- Other 'guilty parties', if any are suspended or dismissed.