

*Policy on Ethical Behaviour  
within Flexfamily*

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## *1. Introduction*

This document gives substance to our policy on Ethical Behaviour for all employees of Flexfamily. Flexfamily is understood to include: Seesing Flex, Vast., Fides, Flexfactory, Aelbers, Marquette, 2Work, Maggie, Vitaal!, Evolon, Koers Oost and any other (future) affiliated companies, (also referred to as operating companies or Brands).

## *2. Management statement*

*We believe it is important that all our employees treat each other, our flex workers, our customers and our partners and suppliers professionally, respectfully, sincerely, friendly and politely.*

This is what we call ethical behaviour. We do not consider transgressive behaviour, unethical actions and discrimination acceptable and we will not tolerate it. We act according to and in the spirit of our Flexfamily values, our Flexfamily Code of Conduct, Dutch rules and regulations and socially accepted standards and values.

## *3. Flexfamily values*

What do we stand for and what do we consider important at Flexfamily? We are an organisation that sets great store by helping each other to pleasant housing and to enjoy working and living, with a heavy focus on East Netherlands. We like all of our colleagues and flexible workers to want to and be able to make a difference every day because they are and want to be part of Flexfamily. Therefore, we attach great importance to how our employees and clients appreciate Flexfamily as an organisation they like to work for, do business with, be part of and be involved in for assistance and advise.

In Flexfamily we believe it is important to treat each other positively. Basically, we pursue the following values:

We have a positive view of humanity, which focuses on:

- respect and appreciation for the other person;
- inclusive thinking and acting.

Trust is the basis for our relationships and actions and that is why we are:

- ethical, honest and reliable;
- focused on the long term;
- open-minded and weighing everyone's interests;
- caring, attentive, warm and helpful;
- very clear about what we do not accept.

In our methods and goals, we are:

- professional, competent and transparent;
- focused on development and learning;
- focused on satisfactory profits.

#### 4. *Legal framework and legitimacy*

Our policy on Ethical Behaviour contains provisions *inter alia* from the Dutch Constitution, the Working Conditions Act, the Dutch Civil Code and Union law.

- Section 1 of the Dutch Constitution states that all persons in the Netherlands shall be treated equally in equal circumstances. Furthermore, Section 1 states that discrimination, on whatever grounds, shall not be permitted.
- The Dutch Civil Code (Book 7, Section 611) provides that the employer and the employee must behave as befits a reasonable and fair employer and a reasonable and fair employee.
- Furthermore, the Working Conditions Act (Section 3, subsection 2) applies, which regulates that employers are responsible for the psychosocial work load, which includes undesirable manners such as aggression and violence, (sexual) harassment, bullying, discrimination and work pressure.
- Employers (with the exception of self-employed individuals) are required to make a hazard identification and risk assessment (HI&RA). This includes an assessment of the psychosocial work load. The HI&RA is part of prevention management and the role of the health and safety officers.
- Section 28, subsection 1 of the Dutch Works Council Act states that the Works Council (our Family Council) is tasked to ensure good working conditions. The Family Council therefore also monitors whether work and psychosocial work load are an issue for employees.
- In addition, organisations with more than 50 employees (which includes temporary workers, interns and volunteers) have to contend with the Whistleblower Protection Act.

## *5. What exactly do we mean by Ethical Behaviour?*

When it comes to Ethical Behaviour, the underlying question we ask ourselves as a service-providing organisation is: "Are we doing our job properly?" At the same time, a properly formulated policy on Ethical Behaviour is not the end, but the beginning. It is not about rules, regulations and procedures. Yes, they are necessary, and yes, we have them in place. For clarity, for something to go by and to fall back on. But mostly, it is about working together towards a good communication culture. That everyone within Flexfamily is and feels able to discuss moral questions, dilemmas at work, the quality of their own decisions and those of others. And so this is where Flexfamily's management and board have a clear responsibility. On the one hand, to ensure that we create, facilitate and maintain an organisational climate - read culture - with instruments such as Great Place to Work, confidential advisers, External Complaints Procedure (see Annex C), the Abuse Reporting Scheme (see Annex D) and the Code of Conduct (see Annex B), to name a few concrete examples. On the other hand, it requires managers to 'manage' ethical behaviour, which is also simply part of their job. A Brand manager who demonstrates in their behaviour what it means to 'do your job properly' is highly likely to have their colleagues from their team and Brand follow (as far as necessary).

Ethical Behaviour management starts with management and board acting ethically. This means that managers must be clear about the Flexfamily values and the Code of Conduct and rules and regulations in force, and must apply them (including sanctions and valuation). Ethical Behaviour also includes being able to operate in the spirit of the Flexfamily Code of Conduct as the occasion arises and being willing and able to be accountable within the scope of the Flexfamily values. Therefore, these are two elements of managing Ethical Behaviour: ensuring compliance with our Code of Conduct and encouraging the Good Talk on moral issues and questions (compliance and encouragement). This requires management and board to be able to work transparently and perhaps unrelentingly according to the Flexfamily Code of Conduct, but also to be able to initiate and guide open conversations on issues for which there is no (clear) desired behaviour in the Flexfamily Code of Conduct. Therefore, they are required to have a clear understanding of what behaviour from the Flexfamily Code of Conduct they want to see adhered to within their Brand and team and where they feel their employees have room to act as they see fit.

Management and board therefore must have answers to questions such as:

- How do I account for my behaviour as a manager / board member?
- What is my main task as a manager?
- Where is the boundary for me?
- How much openness do I want in my Brand or team and how do I create this openness?

## *6. Misconduct and abuse*

We want to work towards a positively formulated policy with guiding values and ditto behaviour every day. At the same time, it is important to indicate the boundaries, what we find absolutely unacceptable and therefore will have consequences attached to. In other words: misconduct, transgressive behaviour and abuse.

Misconduct and transgressive behaviour are not about the first lame joke, a haplessly misplaced remark and a spontaneous declaration of love after a convivial drink. We assume everyone working at Flexfamily to be professionals and being able to resolve minor incidents and misunderstandings together.

Misconduct, however, is about the further development of such incident When the lames jokes find themselves a laughing stock.

When an individual's special characteristics, such as their gender or religion, are abused for negativity.

And when pressure is put on an individual to agree to something they do not want.

When teasing becomes bullying. When a casual remark about clothes turns into continuous cutting remarks about looks. The moment colleagues start to feel under pressure, individually or as a group, to work overtime on a structural basis instead of staying late once in a while.

As said before, incidents occur in every organisation. If such an incident has a large impact or social implications, it is called an abuse. It is called a suspicion of an abuse if you notice serious problems or irregularities in your work for Flexfamily. These are abuses that, in your view, should be disclosed and acted upon. An abuse is therefore not the same as an individual issue such as a conflict between an employee and their immediate manager.

Examples of abuses are:

- Violation of statutory or internal regulations;
- Fraud;
- Forgery of documents;
- Danger to Flexfamily's proper operation as a result of improper acts or omissions;
- Danger to the safety of employees or other individuals.

## 7. What to do in case of misconduct and abuse

It is good to know that first of all we will listen to you if you notice something that affects you or someone else working at Flexfamily. And as different situations require different people lending their ears, we have organised it accordingly. Of course, confidentiality is guaranteed at all times.

What to do in case of misconduct:

- You can always get help from your manager;
- If you cannot or do not want to turn to your manager, you can always turn to your Brand manager;
- If you cannot or do not want to go to your Brand manager, the door to our Family Capital adviser Elly Nijenhuis is always open for you;
  - Elly Nijenhuis  
[elly@flexfamily.nl](mailto:elly@flexfamily.nl)  
+31 (0) 6 34930999
- If you want to resolve it outside the organisation, you have the option of contacting one of our two external confidential advisers;
  - Gerard Dijkstra  
info@konfidi.nl  
+31 (0) 6 55183368  
[www.konfidi.nl](http://www.konfidi.nl)
  - Annemieke Kirch  
Annemieke@vertrouweninbedrijf.nl  
+31 (0) 6 54766729  
[www.vertrouweninbedrijf.nl](http://www.vertrouweninbedrijf.nl)
- Should you even find that not safe enough, you have the option of filing a complaint with the external complaints committee. In the Annex you will find the external complaints committee regulations.
  - Partners in Integrity  
[info@partnersinintegriteit.nl](mailto:info@partnersinintegriteit.nl)  
+31 (0) 85 0640398  
<https://partnersinintegriteit.nl/contact>

### 7.1 What to do in case of an abuse

Abuse is a threat to the integrity and reputation of Flexfamily and its employees. Flexfamily sets great store by a suspicion of an abuse being reported. That is the only way abuse can be investigated and resolved. It also enables the prevention of any possible future abuse. Flexfamily believes it is important that employees are not afraid to report a

suspicion of an abuse in a safe manner and without fearing for their jobs. Flexfamily has an abuse reporting scheme, which is attached as Annex D.

This reporting scheme contains the following:

- What is an abuse?
- Who can report, and how?
- What does Flexfamily do with a report?
- What are the rights of the reporting person?



## *8. Flexfamily attaches consequences to a failure to act ethically*

Having conducted a thorough investigation into the circumstances and having established that an individual has been guilty of misconduct, transgressive behaviour or an abuse, there may be grounds for management to take appropriate measures:

- A warning (whether or not in writing);
- Demotion;
- Suspension;
- Dismissal with immediate effect;
- Reporting to the authorities;
- Prosecution.

## *9. Annexes*

Annexes forming part of the Policy on Ethical Behaviour within Flexfamily 2024:

- Flexfamily Code of Conduct;
- Anti-discrimination statement;
- External complaints committee regulations;
- Abuse reporting scheme.