

PROTOCOLS

CODE OF CONDUCT OF THE COMPANY GOODMORNING BV

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1. ABSENTEEISM PROTOCOL

Introduction

This absenteeism protocol due to illness is designed for all the employees who work for the company Goodmorning Admin B.V.

General

Illness and work incapacity are first, unpleasant for the persons in question. But illnesses are to the detriment of the customer and the company Goodmorning Admin B.V. after all, the customer is forced – for a shorter or longer period – to be deprived of a well-trained and experimented worker. In addition, the sick leaves involve a series of significant expenses. In accordance with the Dutch Civil Code, the collective employment contract in force or the regulations of the customer where you carry out your activity, the company Goodmorning B.V. has the obligation to continue to pay you at least 70% of your salary rights during the period of your work incapacity.

This obligation to continue to pay the wages is maximum for 104 weeks, for the first and the second year of illness we apply the maximum wages per day as maximal wages.

Our work safety department 1-Voud | Arbodienst

The Company Goodmorning B.V. has signed agreements with the work safety department 1-Voud | Arbodienst.

The physicians of 1-Voud | Arbodienst assess, among other things, if you are entitled to request the illness indemnity when you are ill. For this evaluation to be possible, you must observe the regulations of this protocol in case of absence from work. When you announce the company Goodmorning B.V. that you got ill, your request will be taken over to be processed by the absenteeism coordinator. He/she will keep in touch with you and together you will establish the estimated period of absence.

Sanctions

Please keep in mind that if you do not respect the regulations below and/or you do not cooperate to the evaluation of work safety department, it can lead to loss of your right to paid sick leave and/or the supplementary supralegal amounts.



1.1. I got ill. What do I have to do next?

1.1.1. Procedure of announcing the illness

If you got ill, you must announce before 9 a.m. your Team Leader/manager from Goodmorning Admin B.V.

If you are not able to announce yourself, ask someone close to you to do this. Unfortunately, if you do not announce on time, we will not be able to process the illness. If you get ill at work and you leave work to go home, you must announce about your illness on the same day. Please announce about your illness also if you work on night shifts or on weekends. The sick leave requests cannot be processed with retroactive effect unless you have a well-founded reason for which you did not have time to announce sooner about your illness. Such as an emergency admission to hospital.

During the work incapacity we shall apply the legislation of Netherlands and related regulations. The first day of illness is a waiting day and you will not be paid for that day. In the Netherlands you have the right to be paid wages for the whole period of illness. This right can be established only by an occupational physician. You can provide a letter from your family doctor/specialist doctor. Only an occupational physician can appreciate to what extent there is a work incapacity and what opportunities there are for an (adjusted) work.

1.1.2. Emergency call

If there are reasons, 1Voud | Arbodienst can call you to urgently undergo the examination performed by the occupational physician.

1.1.3. Your obligations in case of paid sick leave

You announced that you got ill. In this case, you will probably receive a sick leave indemnity. The company Goodmorning B.V. does not cover own risk. This means the indemnity you will receive from UWV (The Institute for social security systems for employees). We, together with you, are responsible for your reintegration in work. This means that when you announced that you are ill, you have a series of obligations. They can be found in the Control Norms of the Law for payment of sick leaves. You can find more information about them below.

1.1.4. Make sure that you can be contacted

Of course, we, Goodmorning B.V., would like to know how you feel and when you can come back to work. Every day before 6 p.m. you will briefly indicate your availability for the next work day:

If you are ill, the company Goodmorning B.V. should be able to contact you. If you cannot be contacted and if you do not answer our messages, this can have unfavourable consequences on your sick leave indemnity. If you have another telephone number, please provide it though the Plan4Flex app.

1.1.5. Medical visit

We believe that it is important to know how you feel when you are on sick leave, for this reason we will personally come to visit you on a medical visit. The visits will be carried out in the morning before 12:00. The occupational inspector needs to contact you. If during the illness you will be cared for at another address, please inform Goodmorning B.V. about this. If we do not find you at your home, you will receive a message, or we will be leave you a note. Please answer the note immediately. If you do not do this, this can have consequences on your sick leave indemnity.



1.1.6. Make efforts to get well

During your illness you must make all reasonable efforts to get well as soon as possible. Rest. Make sure that you do everything that needs to be done to get well sooner.

1.1.7. Payment of sick leave indemnity

The sick leave hours are calculated based on the average of the last 13 weeks worked.

1.1.8. EMPLOYMENT CONTRACT BY AGENCY WITHOUT TEMPORARY WORK CLAUSE

If you have a temporary employment contract without a temporary employment clause, you will receive 90% of your wages in the first year (but at least the minimal wages) for the contract period. In the second year, you will receive 80% of your wages. The first day of work incapacity is considered waiting day and you will not be paid wages for this day.

According to the Collective bargaining agreement for the seconded staff (ABU CAO) you have right to a completion of the legal sick leave indemnity. This is 20% in the first year of illness and 10% in the second year of illness. To be able to pay you this amount, please communicate to the company Goodmorning BV the amount of your indemnities received. If the contract with Goodmorning B.V. expires while you are on sick leave, you will fall under the incidence of safety net scheme. You have the right to at least 70% of wages per day according to the Health Law for the period of your illness. UWV will evaluate if you are ill, which involves that you are available and answer the correspondence that you will receive.

1.1.9. Work safety department

The Company Goodmorning B.V. works with the work safety department 1-Voud | Arbodienst. Our occupational medicine department will invite you to undergo a medical examination. We want to remind you that an invitation from the occupational physician also involves commitments, so it is mandatory that you attend it. If you cannot go to your medical examination, discuss about it with the human resources manager. If you do not attend the medical examination or if you do not cancel your appointment according to regulations (at least 48 hours before the examination time), you can be obliged to pay the costs with the medical examination hour. If you are still ill on the day when the occupational physician declared you cured, you must announce us immediately by phone.

1.1.10. Bring a valid identity document

Do you need to go to your medical examination, or will we visit you? Then, you have to present a valid identity document. For the first time, you can present a passport, an identity card or a stay permit. The following time, the driving license is ok. The person who accompanies you must also have a valid identity document on him/her.

1.1.11. Make efforts of reintegration

You must make active efforts for the reintegration in work. Make thus anything you can to come back to work as soon as possible. If you are ill for a period longer than 6 weeks, draw up a plan of action with the absenteeism coordinator of the company Goodmorning Admin BV and the plan of action must be signed by both Parties. It will include the consents related to your reintegration activities.

1.1.12. Accept a suitable replacement work

Sometimes, given your illness, you may not be able to carry out your kind of activity, but you can carry out another type of work. What a suitable job involves depends on your health status and the period of your illness. The company doctor will establish with you what kind of work would



be more suitable for you. You must always accept suitable work, even if it is below your level. You do not need to do suitable replacing work when you are on annual leave up to maximum 4 weeks per year.

1.1.13. Send us your changes

If your situation changes, this can have consequences on the amount or period of your sick leave indemnity. That is why, you are obliged to offer information about the changes directly to the company Goodmorning Admin B.V. The most frequent types of changes you have to communicate us are as follows:

- Changes to your contact data;
- You go abroad (only after you consulted Goodmorning Admin B.V. and with the approval of your occupational physician);
- o You go on holiday (only after you consulted Goodmorning Admin B.V.);
- You will earn more/less income;
- You will cease your activity;
- *You earn extra wage income, for example a supplement to your indemnity;
- Changes of your health condition;
- Changes of your life situation;
- Your personal situation changes, for example, you move somewhere else, you change your bank account, you are hospitalized;
- You are in detention;
- You are pregnant or ill because of pregnancy/birth

1.1.14. What do you have to do when you feel better

When you feel better, you must announce Goodmorning Admin B.V. within 48 hours. If you are still ill on the day when the occupational physician declared you cured, you have to announce us immediately by phone.

1.1.15. Respect your obligations

It is important that you respect your obligations. Otherwise, you will receive lower wages, or you will not receive any wages and/or you will be applied fines. You can find more information about it in the Decision regarding the social security legal measures. If you receive too much income, you must return the amount received in addition.

1.1.16. Law for increasing the changes of reintegration in work

The law for increasing the chances of reintegration in work was drawn up to reduce the number of ill employees on the long term. This law imposes the employer and the employee to collaborate to make sure that the ill employee can come back to work as soon as possible, in a responsible way. This law establishes the obligations of the employer and of the employee. From you, as an employee, we expect you to take an active part and take initiative in the mandatory reintegration process, with the purpose of coming back to work.

1.2. Procedure – Law of increasing the chances of reintegration in work

1.2.1. Day 1:

Announce about your illness your intermediary from Goodmorning Admin B.V. and eventually, your manager from the company where you work, according to the procedure above. Goodmorning Admin B.V. will transmit your announcement further to the occupational medicine department 1-Voud | Arbodienst. Goodmorning Admin B.V. will contact you to discuss the nature of illness and the prognoses.



1.2.2. Week 6:

If you have been ill for six weeks, you will receive a message to present yourself to the occupational physician. He/she will have to draw up a report for analysis of the medical problem. This report will also include the reason for which the employee cannot work, the possibilities of recovery and rehabilitation and when the employee anticipates that he/she can resume his/her activity.

1.2.3. Week 8:

Within eight weeks from announcing the illness or within two weeks from the analysis of medical problem, the employer will prepare a plan of action by consulting the employee. This plan describes the effort the employer and the employee will make for the employee to come back to work. The plan of action belongs to the reintegration file and is signed by the employer and the employee.

1.2.4. Regular progress:

The employee and the employer must meet every six weeks to discuss the progress of situation. They can decide in mid-term to adjust the plan of action. The employer is responsible to make sure that the occupational physician keeps regularly in touch with the employee to assess the progress of work incapacity.

1.2.5. Week 42:

In Week 42, the employer must report to UWV the evaluation of the first year of illness.

1.2.6. Week 50:

Before the employee proceeds to the 2nd year of sick leave, the employee and the employer will go again through all the steps carefully. Are there things we can work on together to facilitate your return to work?

1.2.7. 20 months:

If after 20 months, you are still not fit for work, on the 87th week you will receive a request form WIA (Law on work and income depending on work capacity) from UWV. Attention! You must send this form filled in back to UWV within three weeks. Shortly afterwards, UWV will evaluate the reintegration report and will proceed to an examination according to WIA Law.

Further information about the Law on increasing the chances of reintegration in work field can be found on: Wet verbetering Poortwachter | Arboportaal (website)

1.3. Regulations in case of sick leave

1.3.1. Enforcement of sick leave regulations

All the Parties are jointly responsible for the enforcement of the sick leave regulations. We will assume that you are familiar with the procedures set out by these regulations.

1.3.2. Parties involved in enforcement of sick leave policy

In the enforcement of sick leave policy, the following Parties are involved: the employee, the employer and 1-Voud | Arbodienst. Each Party has its own obligations.



1.3.2.1. The obligations of the Employee

The employees who cannot carry out their activities because of work incapacity caused by an illness are obliged to:

- Cooperate in application of measures adopted by the employer (or by an expert appointed by the employer);
- Cooperate in preparation, evaluation and adjustment of a problem analysis and of the Plan of Action (PoA) in view of his/her reintegration in work;
- Carry out suitable work for the employer, and the work will be facilitated by the employer.
- Actively cooperate in reintegration in the context of enforcing the Law on increasing the chances of reintegration in work field (WvP) and/or the Law on paid sick leaves (ZW):
- o To keep in touch with the employer and possibly, with the customer;
- The Employee must not provide false information at hiring;
- We expect that the employee will not carry out activities (apart from work) which can slow down his/her medical recovery for the period of illness.

If the employer acknowledges a violation of this absenteeism protocol by the employee, the violation will be reported. The employer has the right to impose sanctions if this protocol is violated, if Article 10 of Disciplinary Regulations is violated, according to Article 7:629 of the Civil Code.

1.3.2.2. The obligations of the Customer

The Customer has the following obligations:

- To take measures and give instructions, if necessary, within the reasonable limits, to allow the ill employee to carry out his/her own activity or another activity suitable to his/her health status;
- The Customer has a major contribution to avoid complaints, absenteeism and to supervise and reintegrate the ill employees unfit for work who are its responsibility.

1.3.2.3. The obligations of the Employer

The general tasks of the employer in the context of sick leave include:

 Signalling and providing support in the application of Law WvP, for the purpose of reintegration in work.

1.3.2.4. The obligations of 1-Voud | Arbodienst

The occupational physician, the person who delegates the tasks and the case manager of the company 1-fold | Arbodienst offer support to the employer.

The main tasks of the absenteeism coordinator | HR Manager include:

- Keeps in touch by phone with the employee. The contact by phone can be followed by any of the steps listed below:
 - 1. Makes an appointment with you for the resumption of activity;
 - 2. Sends you to the appointment made by the occupational physician;
 - 3. Subsequent contacts (by phone);
 - 4. Makes recommendations to the employer, among other persons, regarding the legal issues.



- Takes interviews (in person) related to absenteeism, to monitor the progress for absence period;
- Takes interviews related to absence for preparation or adjustment of plan of action;
- Makes a referral of the employee to third parties (for example, makes an anticipated appointment to the occupational physician, involves the occupational physician within the company, the reintegration office or requests an emergency check-up to the occupational inspector);
- o Guides the ill employee based on processes established in the company.

The occupational physician has the following main tasks:

- Establishes the degree of work incapacity;
- Offers medical guidance to the employee who was absent from work;
- Makes prognoses related to the resumption of activity;
- o Within the enforcement of Law WvP, he/she draws up the problem analysis report;
- Offers recommendations to the employee and to the employer related to preventive measures.

The competences of occupational physician are:

- Makes an appointment for the employee for the medical examination;
- Makes an agreement with the employee for return to work;
- Medically examines the employee;
- With the consent of the employee, the occupational physician can consult and/or can obtain information from: the family doctor, the specialist doctor or other doctors (for example the occupational physician from the company).

Delegation of tasks

The occupational physician can delegate his/her competences (or a part of them) to a delegated person. The delegated person (other than the case manager) has to specify the purpose of contact with the employee and can ask questions about the illness. The delegated person takes note of such information and communicates it to the occupational physician. Based on such information, the occupational physician will make an initial evaluation and will establish the route to follow.

The Department 1-Voud Arbodienst will communicate in writing to the absenteeism coordinator or HR Manager, after each examination, the conventions made and/or the limitations or relevant opportunities for reintegration. The Feedback can be used in the absence-related interview and can be archived in the reintegration file, under WvP Law. The occupational doctor must keep professional secrecy. The Case Manager and the delegated person have in turn to keep professional secrecy deriving from it. The consultation between 1-Voud | Arbodienst and the employer regarding, for instance, the resumption of activity, will be limited to the restrictions and possibilities for resumption of activity. 1-Voud | Arbodienst will observe the directives set out in the General Data Protection Regulation (GDPR).

1.3.3. Free days during sick leave

If you want to take leaves or free days during the sick leave, consult the absenteism coordinator or your direct manager. He/she will establish (if it is necessary by consulting the occupational physician) if the leave proposed is not to the detriment of medical rehabilitation. During the leave, the leave hours will be paid.



In case of partial disability and annual leave, the annual leave hours will be deducted in full. During the sick leave you accumulate full annual leave hours (on the worked hours, but also on the sick leave hours).

If you take leave as paid free days, they will be deducted from the payment of sick leave hours.

1.3.3.1 Announcement of illnesses and getting well during leave

Announcement of illness during the leave period must always be followed by the announcement of getting well as follows:

- A message of illness during the leave;
- Or a message of getting well at resumption of activity.

1.3.3.2 Message of falling ill during the annual leave

If you fall ill during the annual leave, you must announce the company about your illness according to the standard procedure. Make sure that you can be contacted any time by the absenteeism coordinator. In this situation, you can expect to be invited to a medical examination performed by the occupational physician from the nearest location. Then, all the steps of this absenteeism protocol must be applied.

1.3.3.3 Message of getting well during the annual leave

If you got well during the annual leave, you have to announce about it as soon as possible the absenteeism coordinator or your manager, not later than the following working day before 9.00 a.m.

At your return home, you must present the occupational physician with a medical certificate issued by a doctor from the location where you spent your annul leave. This certificate must be clearly legible in English or Dutch and must specify the nature of disease and/or disability, the duration and (if applicable) the reason for which you could not travel back at the previously agreed time.

If we have doubts about the illness announced, we can ask the company doctor to contact by phone the attending physician from abroad.

1.3.3.4 Call for medical examination by the occupational doctor after your return from leave

After your return from leave (even if you have got well already), you can be called for a medical examination by the occupational doctor. During the medical examination you must present a medical certificate from a doctor or other documents (prescriptions, packaging of medicines released in your name., etc.) by which you can prove the work incapacity which occurred during an annual leave.

1.3.4. Cosmetic surgeries

In case of cosmetic surgeries which do not have medical cause (confirmed by the doctor), the days when you cannot work are at your expense. This means that you will not receive a sick leave indemnity for those days. You can take leave hours to be paid.

1.3.5. Second opinion

You may request a second opinion from another occupational physician, if the first occupational physician agrees. The first occupational physician collects data for the second occupational



physician. If a second opinion is requested, it will not have suspensive effect on the first medical opinion. In other words, the opinion of the first occupational physician must be followed until the occupational physician whose second opinion was requested has drawn a contrary conclusion. However, it is noteworthy that the waiting time for a second opinion is long, because the occupational physician from our company must collect all the data and study the file before issuing an opinion.

1.3.6. Expert examination

If you have doubts about the way things went during the period of your reintegration, you can request an expert report from UWV. You will pay the costs of this expert examination. There are only four questions in which UWV offers a specialized opinion:

- o Is this about work incapacity?
- o Is there any opportunity for adjusted work in the organization?
- o The reintegration efforts of the employee;
- The reintegration efforts of the employer.

1.3.7. Free paid days

It may occur an unpredictable personal situation which prevents you temporarily from carrying out your activity. In such cases, it is not allowed to announce illness because you did not fall ill. It is important that you take the initiative (if a manager has to ask you about a personal situation, he/she violates the GDPR rules) and to discuss the matter with your manager so that you reach a solution together. A series of situations are already regulated by the law, for instance: leave for raising the child, leaver for exceptional and emergency situations, leave for short-term care, leave for long-term care, leave without pay, adoption leave and placement leave.

1.3.8. Actions and responsibilities in the first and second year of illness

The employer and the employee are jointly responsible for the reintegration in work in the first two years of work incapacity. The Department 1-Voud | Arbodienst has a role of solicited or unsolicited support, both in the relationship with the company Goodmorning Admin B.V., and in the relationship with the employee. The absenteeism coordinator or the HR Manager will report as follows:

- All the documents and data regarding the period when the employee was absent from work;
- Number of hours worked in case of a partial work incapacity;
- o The activities carried out for reintegration.

The data are kept in the so-called reintegration file.

1.3.9. Medical examination for prevention

You can address the absenteeism coordinator or the Human Resources Manager or the occupational physician for questions about (imminent) health and work problems, before you have pain or before you need to be absent from work because of an illness. If you want to use this opportunity, you can contact by phone, out of own initiative, the absenteeism coordinator or the HR Manager or the Department 1-Voud | Arbodienst.



1.3.10. Contacts with 1-Voud | Arbodienst after the second year of illness

If the two years of illness have ended, but without your contract with the employer having ceased ex officio, the contact between the Department 1-Voud | Arbodienst and you will be ended after you reach the end of waiting period according to WIA Law. If UWV imposes a sanction because you did not take advantage of the opportunities offered by WIA during the waiting period of 104 weeks, the contract between you and the Department 1-Voud | Arbodienst continues for the period of sanction.

1.3.11. Cessation of employment contract

If after two years (104 weeks) from the first day of work incapacity, you are still totally or partially unable to work, the employment contract will cease based on long-term work incapacity for that part when the work incapacity continues. In case of total work incapacity, the employment contract will be terminated completely.

1.3.12. Further information about reintegration during the 104 weeks of sick leave

If during the sick leave, it is acknowledged that you cannot return to work because of a disease or a disability (justified by the occupational doctor and the expert in work problems), Goodmorning Admin B.V. has opted for starting an external process of reintegration for you (Path II), according to the Law on increasing the chances of reintegration in work field (WvP) and/or the enforcement of Law ZW,

As part of the reintegration obligation, you must cooperate to this process. If we note that physical obstacles caused by disease or disability are of permanent nature and because of these obstacles, you have exhausted the opportunities to carry out a suitable work permanently, you can request the Institute UWV to perform an anticipated expert examination and draw up an expert report by virtue of Law WIA. Taking into account the legal provisions in this field, this means that you can submit a request for anticipated wages after 13 weeks of work incapacity (calculated from the first day of illness) up to 68 weeks of work incapacity. For all these steps, you must cooperate within your legal obligations.

1.3.13. Consequences of not observing the rules from the absenteeism regulations (sanction)

If you cannot work because of work incapacity, you have the right to be paid your salary rights. The employer will consider the opinion of the occupational doctor and/or of the absenteeism coordinator. The employer is obliged to apply a sanction if an employee violates any of the rules mentioned in this protocol without a founded reason, such as:

- The employee is not found at home for the medical check-up;
- The employee cannot be contacted by 1-Voud | Arbodienst or Goodmorning Admin B.V.;
- The employee does not appear at the appointment for the medical examination or does not cancel it on time, without having a justified reason;
- o The employee is not ill, but he/she announces the company that he/she has fallen ill;
- The employee does not cooperate to the updating of the plan of action and/or does not return on time the plan of action signed (updated).

The possibilities of sanctioning are as follows (in chronological order):

- Verbal reprimand with note in the staff file;
- Written reprimand recorded in the staff file;
- Suspension of wages;



- Suspension of continuation of payment of wages;
- o Suspension of work
- o Dismissal.

1.4. Continuation of payments to the employee in case of illness

The first day when an employee is ill is considered waiting day. The employee will not receive wages or sick leave indemnity for this day. Since the 2nd day, the employee will either continue to be paid the wages during the sick leave or will receive an illness indemnity, depending on his/her own situation, for instance, if he/she has a secondment contract or was ill at the cessation of his/her contract.

An employee has right to the following benefits, in case of work incapacity and if the secondment contract has not ceased:

- 90% of time-based wages, in the first 52 weeks of work incapacity and at least the minimal legal wages which applies to him/her;
- 80% of time-based wages from the Week 53 to Week 104 of the contract.

After the cessation of employment contract, the employee from Phase B has right to an illness indemnity of 70% based on the decree regarding the daily wages for insurance of employees.

Supplementary illness indemnity after the cessation of employment in Phase A

If the temporary worker is unfit for work when the temporary work contract ceases by law at the date agreed in Phase A, if the temporary worker has right to illness indemnity the temporary work agency will complete this indemnity.

In the first 52 weeks of work incapacity, the illness indemnity will be completed up to 90% of the wages calculated based on the wages established by the Decision regarding the mandatory insurance of the employee (it is calculated by UWV).

For the period which begins in Week 53 up to Week 104 of work incapacity, the illness indemnity will be completed up to 80% of the wages per day, calculated based on the wages established by the Decision regarding the mandatory insurance of the employee.

In order to receive this extra indemnity, you must send the company Goodmorning B.V. the pay note received from UWV for each period.

1.5. Protection of private life

Both Goodmorning Admin BV and 1-Voud | Arbodienst work to observe the rules set out in the General Data Protection Regulation (GDPR).

All the employees of Goodmorning Admin B.V. have right to a careful treatment by managers and external bodies (such as 1-Voud | Arbodienst) and to a fair attentive treatment of all confidential and personal data. The employees have any time the right of access to the data included in their medical file. The occupational physician of 1-Voud | Arbodienst has the obligation to keep the professional (medical) secrecy.



2. CODE OF CONDUCT

2.1. Introduction

A code of conduct is a description of the desired behaviour within the company. This code of conduct establishes the way in which we expect our employees to interact with their colleagues, customers, suppliers, the gift acceptance policy, the policy on procurement and publication of information. Moreover, the code of conduct contains rules about the way in which the company wants to treat its employees and the expectations about integrity and ethical conduct.

2.2. Plan of steps – Code of conduct

This Code of Conduct applies to communications and expressions of Goodmorning Admin B.V. and aims to offer the means for this purpose. As a temporary work organization, Goodmorning Admin B.V. is a member of ABU (General Federation of Temporary Work Companies) and we are obliged to respect the standards established by ABU in matters of adequate behaviour of members for a socially responsible management.

The Code of Conduct was drawn up to offer our permanent employees, temporary workers and customers/users of Goodmorning Admin B.V. clarity about what is and what is not allowed in matters of disparities of treatment prohibited by law based on gender, race, ethnic origin, skin colour, nationality, religion, life beliefs, political orientation, marital status, sexual orientation, disability and age criteria.

2.2.1. General provisions

2.2.1.1. Observance of legislation and regulations

In Goodmorning Admin B.V. we carry out our activity by observing the laws and regulations applied to our activity and we assure the strict observance of these rules. All the employees, managers and directors of the company have the duty to strictly observe the laws and regulations. All the employees of Goodmorning Admin B.V. are obliged to report immediately any violations to the direct manager. If you have ambiguities about a certain situation, you have the obligation to immediately contact the line manager.

Apart from the observance of laws and regulations, we pay a certain importance to the protection of data and confidentiality of all our customers, suppliers and our employees. We permanently assure that these data are protected against unauthorized access.

2.2.1.2. Social responsibility

In Goodmorning Admin B.V. we carry out our activities with the observance of human rights and basic human standards. We observe the laws and treaties in this matter. All the employees have the responsibility to observe these regulations and they must apply them in their day-to-day activity. We also commit to adopt sustainable and environmentally friendly business practices to minimize our impact on environment.



2.2.1.3. Fair competition

We have undertaken the commitment to promote fair competition and strictly observe the laws and regulations in this field. This includes, for instance, laws and regulations regarding cartels, price setting and agreements for allocation of customers or regional allocation. All the activities that restrict fair competition are prohibited. We also prohibit all the meetings with third parties to exchange confidential information about prices, future prices, collaborations, relationships with customers or suppliers. This is also valid for the information about takeovers, procurement and assignments of the company. If there are meetings with third parties concerning such operations, it is important to get involved the right persons in these steps and to consult the legal department in the beginning phase of actions, to avoid wrong interpretations.

2.2.1.4. Prevention of corruption and money laundering

In this company it is strictly prohibited to obtain individual benefits by accepting payments from business partners or by offering money to them. The offering or reception of gifts or special entertainment is only allowed with the permission of the line manager of an employee, or a manager appointed for this purpose. It is not permitted to offer money or gifts for professional use without observing the adequate procedures.

We take very seriously our responsibility to prevent corruption and money laundering. All the employees are obliged to report such activities to the line manager, or the person appointed to report such activities. The failure to observe these rules can entail disciplinary actions, including the termination of the individual employment contract.

2.2.1.5. Accuracy and completeness of administration and archiving

In our company it is very important that all the business transactions are properly recorded in administrative records. It is mandatory to keep and archive proofs of these transactions. All the documents related to administration and archiving must observe the (local) legislation and tax regulations.

It is the responsibility of each employee of our company to cooperate for a correct administration and to act in accordance with the correct procedures. If an employee has questions or needs help to manage certain things, he or she can always address his/her line manager for support.

2.2.1.6. Prevention of intended or unintended discrimination

This Code of Conduct has been drawn up to make sure that Goodmorning Admin B.V., as an employment organization, applies to the permanent employees, temporary workers and to customers/beneficiaries, the principle of non-discrimination in its staff policies and offers its employees clarity about the way they can avoid the wilful or unintended discrimination. The Code of Conduct has the following main purposes:

- Materialization of non-discrimination principle;
- Assurance of the principle of equal chances for employees (potential employees) and temporary workers of Goodmorning B.V., based on the Code of Conduct of Goodmorning B.V.



2.2.1.7. Enforcement of anti-discrimination policy

Indeed, as workforce employment and staff recruiting organization, the company Goodmorning B.V. has the responsibility to draw up and enforce an anti-discrimination policy. Using the principle by which we can choose each time the best-suited candidate can contribute to prevention of discrimination. It is also important that the company Goodmorning B.V. gets involved in the prevention of under privileging minority groups and the fight against the discriminatory behaviour or the racist requests from beneficiaries. Thus, we promote the fair and equal treatment of the employees and of temporary workers and we prevent discrimination.

2.2.1.8. Bringing the Code of Conduct to knowledge

Goodmorning Admin B.V. will make the Code of Conduct public and will make sure that it is known by all permanent employees, temporary workers and customers/beneficiaries of the company. The Code of Conduct will be regularly revised and where it is necessary, we will give instructions about its method of application.

2.2.1.9. Evaluation of Code of Conduct

The functioning of the Code of Conduct is evaluated every year.

2.2.2. Prohibition of discrimination

2.2.2.1. Rejection of discrimination

The Company Goodmorning B.V. prohibits the discrimination based on criteria of gender, religion, beliefs, political membership, race, nationality, sexual orientation, marital status, disability or chronic disorder and age, in accordance with the General Law on fair treatment (AWGB), Law on fair treatment between men and women (WGBH/CZ) and the Law on fair treatment according to age in hiring (WGBL).

2.2.2.2. Rejection of requests or goals with discriminatory effect

Opinions or preferences of customers, employees or their relationships do not represent a valid reason for exclusion of persons. The company Goodmorning B.V. informs the customers and potential customers that it will not give in to requests or goals with discriminatory content.

2.2.3. Recruitment and selection

2.2.3.1. Equal chances principle

In the selection of temporary and permanent staff, Goodmorning Admin B.V. makes sure that everybody has equal chances of selection. The text and images from advertisements must not suggest that potential candidates who belong to certain minority have lower chances of being selected.



2.2.3.2. Avoidance of misjudgements towards ethnic minorities

In establishing the selection criteria, we pay a special attention to avoiding the misjudgements and discrimination of candidates, so that there are no direct or indirect discriminatory elements.

2.2.3.3. Marginal notes about the performance of psychological tests

If we decide to subject a candidate to a psychological test, we will consider the potential cultural prejudices that may exist in such tests. We will consider these prejudices for the carrying out and interpretation of psychological tests.

2.2.3.4. Recognition of diplomas issued in other states

The degrees and diplomas issued in other states than the Netherlands will be recognized based on equivalent diplomas issued in the Netherlands.

2.2.3.5. Preferential policy for vacancies

If Goodmorning Admin B.V. has vacancies, it is allowed by law that the company has a preferential policy for only three groups: women, persons belonging to a certain ethnic or cultural minority group and the disabled persons or those with chronic disorders. However, this is allowed only if the purpose of this policy is to place the persons belonging to these groups in a privileged position to eliminate the inequalities de facto.

Goodmorning Admin B.V. cannot adopt preferential policies towards other groups than those mentioned above – such as men, persons who do not belong to an ethnic or cultural minority group ("native population"). Also, it is not allowed to implement a preferential policy based on other personal characteristics. There are requirements for the application of preferential policies set out by the General Law on fair treatment and the Law on fair treatment for reasons of disability and chronic disorder/disease.

Goodmorning Admin B.V. is guided exclusively by the functional provisions, with the observance of legal provisions in matters of recruitment, selection and lease of temporary workers.

The Company Goodmorning B.V. informs the customers/beneficiaries that the law prohibits giving in to requests or goals with discriminatory content.

Goodmorning Admin B.V. makes sure that the open relationships are presented in a way which does not show a preference based on gender and age. If exceptionally we make a differentiation based on fair treatment, this reason must be expressly mentioned when the work offer is proposed. In selection stage, Goodmorning Admin B.V. is not allowed to ask questions related to personal characteristics, such as pregnancy, disability or the chronic disorders/diseases and medical history, unless this is exceptionally permitted based on fair treatment.



2.2.4. Staff management

Discrimination should not play a part in the evaluation of employees' performances. The criteria established to see if the employees can participate in trainings or courses are established so that they do not directly or indirectly contain discriminatory elements. The criteria for career or mobility policies are established so that they do not contain directly or indirectly discriminatory elements.

2.2.5. Dismissal

It is prohibited that the reasons for dismissal or the reasons for not extending an employment contract are related to skin colour, nationality or ethnic origin of the employee.

2.2.6. Measures for prevention of discrimination

There must be no discrimination in the daily interactions between the employees. In Goodmorning Admin B.V., the persons are treated equally. Every employee should feel at home within the company.

2.2.7. Sanction

For the management of Goodmorning Admin BV, a discriminatory behaviour which can be classified in the relevant legal descriptions can entail disciplinary measures and reporting to police for violation of discrimination prohibitions by virtue of criminal law.

2.2.8. Respect and equality

In Goodmorning Admin B.V. we carry out our activity with respect for individual, we avoid discrimination and harassment, and we make all efforts to offer everyone equal chances.

In Goodmorning Admin B.V., personal dignity, opinions and private life of all the employees are respected and we assure adequate health and safety conditions at workplace. The employees are not restricted the right to form groups for the purpose of protecting and consolidating their opinions.

All the employees are treated fairly and respectfully by their managers and colleagues. Discrimination based on criteria of race, colour, nationality, origin, gender, religion, sexual orientation or other personal elements is strictly prohibited. Any form of harassment and physical contact is also prohibited.

2.2.9. Avoidance of conflicts of interests

No employee is allowed to use the assets property of the company for personal use without the written consent of his/her manager. The assets property of the company, including copies of confidential information and data, can be used only for professional purposes and their removal from the place where they were initially located is not permitted.

When we make business decisions, it is prohibited to consider personal interests or relations. If there is a potential conflict of interests, it must be immediately reported to the line manager.

The employees also have the obligation to report when they want to sign transactions on behalf of Goodmorning Admin B.V. with a company in which his/her partner or close



relatives hold more than five percent of the assets or voting rights. The employee has to contact his/her line manager before signing the transaction.

2.2.10. Protection of company assets

Each employee has the responsibility to protect the assets of the company Goodmorning Admin B.V. against loss, damage and theft. We include here the intangible assets such as documents, recordings and other valuable knowledge for the business partners or competitors. The confidential documents and data used in the precincts of Goodmorning Admin B.V., in the company cars or at workplace must not be available to unauthorized persons. To make sure of this, all the employees of Goodmorning Admin B.V. must take the necessary security measures.

2.2.11. Representation of the company and communications in public sphere

All the employees of Goodmorning Admin B.V. are considered as representatives of the company in the eyes of the public. There are always chances that the information about the corporate strategy, mergers and procurement or restructuring projects gets (orally) in the press or in the online environment. Such information (verbal or written) can be disclosed only after the prior consultation of your manager.

3. RELIABLE PERSON

3.1. Introduction

To be able to carry out your activity in integrity conditions, a safe work environment is essential. It offers a space where the employees can speak openly about behaviours which are not in compliance with the values and standards underlying their work.

The reliable person plays an important part in assuring the integrity at workplace. The employees can be reluctant to raising certain problems with their superior or the management. The appointment of a reliable person offers the employees the opportunity to notify morality and integrity problems, violations of integrity and unwanted behaviours, including sexual harassment. The reliable person helps to take the possible measure of prosecution in Court and offers the opportunity to officially report (on a confidentiality basis) the unwanted behaviours. In all the situations where there are delicate problems which need to be solved properly, the reliable person treats all the requests on a strict confidentiality basis. We take measures only if the whistleblower agrees.

Goodmorning has a "Safety Net" type of reliable person, in other words, 2 persons were designated as reliable person. Thus, the employee has the possibility to choose whom he/she wants to address. This is possible by sending an email to: vertrouwenscommissie@goodmorning.eu

The reliable person acts as a resonance box for employees and offers support and advice. The reliable person is there for you to help you solve complaints and to hear you out. Also, he/she advises you whether you should submit or not a complaint or whether a discussion is necessary with the person who causes the inconvenience in the attempt to try to solve the problem.

In the cases where it can be difficult for a "victim" of unwanted behaviour to contact the "author", a mediator can offer a solution. The reliable person can fulfil here the role of mediator



and can engage in a discussion with both Parties. If the mediation does not lead to a solution, you can submit a complaint to the Commission for Complaints. The whistle-blower will fully assume the following steps and the reliable person does not take responsibility for this problem in this case. The responsibility belongs to the whistleblower. If the mediation through the reliable person does not offer a solution, you can resort to a mediator before notifying the Commission for complaints.

3.2. Commission for Complaints

In accordance with the law on work conditions, the employer is obliged to implement a policy which has the purpose to prevent or limit the psychosocial pressure (PSA) as part of the policy on work conditions. This includes the fight against undesirable behaviours such as (sexual) harassment, aggression and violence, bullying and discrimination.

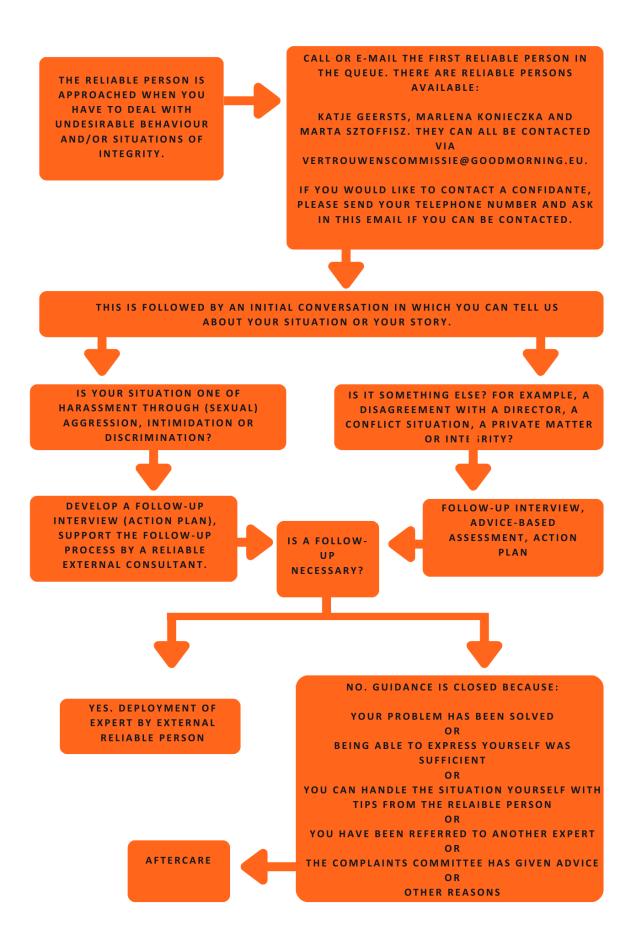
A reliable person can play an important part in the enforcement of this policy. If the unwanted behaviour persists, you can resort to the formal path and can submit a complaint to the independent and impartial commission for complaints, appointed by the employer.

The Commission for Complaints is composed of at least three members. For each commission for complaints only 3 persons of LPC can be selected. An employee from own company and two from other companies. At least two of the three persons will handle the complaint and offer the employer advice about the measures that need to be taken. The reliable person can assist the whistleblower through the whole process, if it is necessary.

3.3. Plan of steps – Plan of notification of the reliable person

The steps that need to be taken to resort to the reliable person are presented by the following diagram and/or the plan of steps.







4. THE SYSTEM FOR REPORTING MISDEMEANOURS

4.1. Introduction

The desirable behaviour or the behaviour which falls within the company norms and values is essential for the well-being and productivity of all the employees and the company. This is about not only the way in which people treat themselves, but also about the way they treat themselves and the environment. The desirable behaviour contributes to a positive and respectful work culture, which can lead to a higher satisfaction and involvement of employees, and higher productivity and profitability for companies. Moreover, the desirable behaviour contributes to a harmonious society, in which people treat one another with respect and tolerance and take the responsibilities to contribute to the common well-being. Briefly, the desirable behaviour is not only desirable, but also crucial to create a positive and productive environment for all the employees as a work environment.

It is essential that the employees adhere to the highest ethical standards and respect the integrity when they carry out their activities. If there are suspicions of integrity violation, the employees can address the Authority for integrity whistleblowers if the suspicion is of social interest. The Authority for integrity whistleblowers offers consultancy, carries out investigations and encourages the companies to monitor their integrity and protect their employees. Further information about the protection of integrity whistleblowers can be found on www.wetbeschermingklokkenluiders.nl.

The suspicions of inadequate behaviours that are important at company level include violations of legal regulations, dangers for the public health or safety of persons, prejudices caused to environment and/or problems in the functioning of the public service or a company because of inadequate actions or omissions. The presumption must rely on justified reasons.

The integrity violations and (suspected) offences may include:

- Theft, embezzlement, fraud, deceit
- Unauthorized activities apart from the job
- Corruption, bribery, acceptance or request for gifts
- Inadequate use or holding of information
- Forgery in public documents
- Abuse of assets, property of the company

The employees who have doubts about the submission of a complaint can speak with the reliable person under confidentiality. For further information about reporting an integrity violation, follow the Plan of steps for whistleblowers of the company Goodmorning B.V..

4.2. Plan of steps – Reporting system for whistleblowers

If it is about a misdemeanour, a violation or a danger of violating a legal regulation or internal regulations of an employer or a danger for the public health, for the safety of persons, for prejudices caused to environment or for the good functioning of the public service or a company because of an inadequate behaviour or negligence, you can report this misdemeanour. The reporting can be made by a person who works for the company or who worked or still works for another company, if he/she got in contact with that company within the work carried out.



4.2.1. Information, recommendations and support for employee

- An employee can request information, counselling and support on a confidential basis to the reliable person when you suspect an irregularity, a wrong action or a violation of EU legislation.
- 2. An employee can request the Authority for integrity whistleblowers information, counselling and support, on confidentiality basis, when he/she suspects an irregularity, a wrong action or a violation of the EU legislation.

4.2.2. Internal reporting by an employee of the employer

- 3. An employee who has a suspicion in the company of his/her employer can report it to any manager who holds a superior hierarchical position within the company. If the employee has a reasonable suspicion that the top manager is involved in the suspicion of malpraxis, breach of law or irregularity, he/she can report the problem to the commission for complaints.
- 4. Also, the employee can report the suspicion through the reliable person. The reliable person, by consultation with the employee, will transmit the report to a manager or to the Commission for complaints, as specified in the previous paragraph.
- 5. The report can be submitted in writing, orally, by phone or by other vocal messaging systems, or at the request of whistleblower, within a reasonable deadline by a talk in any of the locations. The employee also can anonymously report a certain problem.

4.2.3. Internal reporting by an employee of another company

- 6. A person from another company who, by the nature of activities carried out, comes in contact with the company of employer, suspects an irregularity, a misdemeanour or a violation within the company of the Employer can notify the Commission for complaints.
- 7. The whistleblower, too, can resort to a reliable person. The report is treated the same way as the reports submitted by the employees.

4.2.4. Reporting to the competent authority

8. A whistleblower who has a suspicion in the company of his/her employer can also report it to the competent authority by direct message.

4.2.5. Protection of whistleblower against underprivilege

- 9. The Employer will protect the whistleblower from any underprivilege.
- 10. A whistleblower must not be disadvantaged during and after the disclosure of a suspicion, if he/she has reasonable reasons to believe that: the illegal deed can be an imminent or real danger for the public interest or there is a change of being underprivileged if he/she reports to a competent authority or to another competent body or it is less likely that the misdemeanour is remedied efficiently.
- 11. A whistleblower must not be disadvantaged during and after the disclosure of a suspicion of irregularity, infraction of discipline or violation of EU legislation, provided that:
 - a) The Whistleblower has reasonable reasons to believe that the information reported about the suspicion is correct at disclosure time;
 - b) The Whistleblower reported before the disclosure to: employer, a



- competent authority, an administrative body or another competent Court.
- c) Based on information, the Whistleblower has justified reasons to assume that the investigation has not sufficiently evolved.
- 12. By the disadvantage to which we refer in 4.2.5. we understand it as taking a penalty measure such as:
 - a) Dismissal or suspension of employment contract;
 - b) A fine in the meaning of Article 650 Vol. 7 Civil Code;
 - c) Demotion;
 - d) Withdrawal of promotion;
 - e) A negative review;
 - f) A written reprimand;
 - g) Transfer to another branch;
 - h) Discrimination;
 - i) Harassment, intimidation or exclusion;
 - j) Defamation or calumny;
 - k) Anticipated termination of an agreement for the supply of goods or services; and
 - I) Revoking a license.
- 13. We also speak of disadvantage if there is a reasonable reason to hold liable the whistleblower for his/her performances or to take against him/her a prejudicial measure, in the meaning of item 4.2.5., but the measure taken by the employer is disproportional.
- 14. In case of a prejudice to the whistleblower during and after the processing of a report or after the disclosure of a suspicion, we will start from the premise that the disadvantage was the result of reporting or disclosure. The Employer must be able to prove that the disadvantage is not connected with the reporting.
- 15. The Employer will make sure that the managers and colleagues of the whistleblower will refrain from any form of disadvantage in connection with the reporting with good faith and in an adequate way, which may obstruct the professional or personal functioning of the whistleblower. We include here at least the following measures:
 - a) Intimidation, ignorance and exclusion of whistleblower;
 - b) Bringing unfounded or disproportional accusations about the performance of the whistleblower;
 - c) Imposition of an interdiction from checking, expressing or presenting oneself at workplace or having contacts with the whistleblower or with his/her colleagues, regardless of the way in which it was formulated;
 - d) Intimidation of whistleblower, by threatening him/her with certain measures or repercussions if he/she continues reporting.
- 16. The Employer will address the employees who are guilty of under privileging the whistleblower and can give them a warning or can take other disciplinary measures.

4.2.6. Counteracting the prejudice caused to the whistleblower

17. The Commission for complaints designates a contact person as soon as possible after the reception of the report – in consultation with the whistleblower – to make sure that he/she is not underprivileged. The contact person will discuss without delay, with the whistleblower about the existing risks of underprivilege, about the



- way in which they can be limited and about what the employee can do when he/she believes that he/she is underprivileged. The contact person must assure a written recording of all these issues and present this record to the whistleblower for approval and signing. The whistleblower will receive a copy of this document.
- 18. If the Whistleblower believes that he/she is underprivileged, he/she can discuss without delay with the contact person. The contact person and the whistleblower will also discuss about the measures that can be taken to prevent the underprivilege. The contact person must assure a written recording of all these issues and present this record to the whistleblower for approval and signing. The contact person must transmit without delay the report to the manager. The whistleblower will receive a copy of this document.
- 19. The Manager will make sure that the necessary measures are taken to prevent the underprivilege.

4.2.7. Protection of other persons against underprivilege

- 20. The Employer must not underprivilege the reliable person, the contact person, the third parties involved, the counsellor and the investigators appointed by the employer for the fulfilment of the tasks described in these regulations.
- 21. The Employer must not underprivilege an employee who is heard by the investigators after giving a declaration with good faith.
- 22. The Employer will not underprivilege the employee if he/she presents the investigators with documents which, in his/her reasonable opinion, are important for the investigation.

4.2.8. Confidential treatment of report and identity of the Whistleblower and the other persons involved

- 23. All the persons involved in the processing of a report must not reveal the identity of the person who reported, and the identity of the other persons involved without his/her express written consent and must treat the information regarding the report on a confidential basis.
- 24. If the suspicion was reported through the reliable person and the whistleblower did not give his/her permission to be revealed his/her identity, the whole correspondence about the report will be sent to the reliable person, who will transmit it immediately to the whistleblower.
- 25. All the persons involved in the processing of a report must not reveal the identity of the whistleblower and of the other persons without the written express consent of the whistleblower and must treat the information about the report on a confidential basis.



4.2.9. Recording, transmission and confirmation for reception of internal report

- 26. If the employee verbally reports the suspicion to a manager or offers verbal explanations about a written report, the manager in question after consultation with the whistleblower makes sure that these verbal explanations are recorded in writing, and he/she will present these written records to the whistleblower for approval and signing. The whistleblower will also receive a copy of thias document.
- 27. If the employee orally reports the suspicion to the reliable person or offers verbal explanations about a written report, the reliable person after consultation with whistleblower makes sure that these verbal explanations are recorded in writing and he/she will present these written records to the whistleblower for approval and signing. The whistleblower will also receive a copy of this document.
- 28. The Manager to whom the report is addressed will transmit the report without delay to the management of the employer's company.
- 29. If the whistleblower or the manager to whom the report is addressed has a reasonable suspicion that the management is involved in the violation or irregularities, the manager will transmit the report without delay to the Commission for complaints.
- 30. The Manager will send without delay to the whistleblower the confirmation that the report was received, within maximum seven days. The confirmation for reception includes at least a description of the report, the date when it was received and a copy of the report. The Manager will provide the whistleblower with information about the measures to be taken within maximum three months from the reception confirmation.
- 31. The Employer will record a reception report in a register created for this purpose. The details of the report from register are destroyed when they are no longer necessary to fulfil the requirements of the Law on protection of integrity whistleblowers.

4.2.10. Processing of internal reports by the employer

- 32. The Manager investigates the suspicion reported, unless:
 - a) The suspicion is not based on reasonable reasons or
 - b) It is clear beforehand that what was reported does not refer to a suspicion of infraction of discipline, violation of law or irregularity.
- 33. If the manager subsequently decides not to investigate, he/she will inform in writing the whistleblower within two weeks from his/her report. The information will show the reason for which the manager believes that the suspicion is not founded or it is clear from the beginning that the deeds reported are not suspicious.
- 34. The Manager evaluates if a competent authority should be informed about the internal report of fraud suspicion. The reports are sent to other authorities only with the explicit consent of the whistleblower. If the employer notifies a competent authority, the manager sends a copy of it to the whistleblower, unless there are objections in this respect.
- 35. The Manager entrusts the investigation to the Commission for complaints, which is independent and impartial and never entrusts the investigation to persons who could be or were involved in the misdemeanour or irregularity suspected.
- 36. The Manager immediately informs in writing the whistleblower that an investigation was initiated and by whom it will be carried out. He/she will also send



- the whistleblower a copy of the investigation order, unless there are serious objections in this respect.
- 37. The Manager informs the persons concerned by the report related to notification and related to the updating of the competent authority, unless this can affect the investigation or the opportunity to start it.

4.2.11. Deployment of investigation

- 38. The investigators will offer the whistleblower the opportunity to be heard. The investigators must assure a written recording of all these issues and present this record to the whistleblower for approval and signing. The whistleblower will receive a copy of this document.
- 39. The investigators can hear the other Parties as well. The investigators have to assure a written recording of all these issues and present this record to the heard persons, for approval and signing. The heard person will receive a copy of this document.
- 40. The investigators can inspect and request any documents from the company of employer, which they consider reasonably necessary for the carrying out of investigation.
- 41. The employees can provide the investigators with any document they believe is reasonably necessary for the investigators to consult it within the investigation.
- 42. The investigators draw up a draft investigation report and offer the whistleblower the opportunity to comment on it, unless there are serious objections.
- 43. The investigators draw up the final investigation report. They send a copy of it to the whistleblower, unless there are objections in this respect.
- 44. The business secrets received as part of notification must not be used for another purpose except the purpose to comply with the notification.

4.2.12. The opinion of the employer

- 45. Within eight weeks from reporting, the manager will inform in writing the whistleblower about the point of view adopted about the suspicion reported. He/she will also mention the measures to which the report has led.
- 46. If he/she clearly notes that the opinion cannot be expressed in the agreed deadline, the manager will inform the whistleblower in writing. The information will specify the deadline by which the whistleblower can expect to receive the opinion. If the total deadline exceeds twelve weeks, it will be specified why a longer deadline is necessary.
- 47. After the finalization of investigation, the manager evaluates if an external competent authority should be informed about the internal report of suspicion of irregularity, and if the opinion expressed by the employer should be indicated. If the employer notifies an external authority, he/she will send a copy of it to the whistleblower, unless there are objections in this respect.
- 48. The Manager also informs the persons concerned by the report, unless this can affect the investigation or the opportunity to start it.



4.2.13. Principle of contradictoriality about the investigation report and the opinion of the employer

- 49. The Employer will offer the whistleblower the opportunity to answer to the investigation report and to the opinion adopted by the employer.
- 50. If as response to the investigation report or to the opinion of the employer, the whistleblower shows in a justified way that the suspicion was not properly investigated or the investigation report or the opinion of employer contains substantial inadvertencies, the employer will offer an elaborated answer and if necessary, will initiate a new investigation or will complete the current investigation.
- 51. If the employer notifies or notified an external authority, he/she will also send the previously mentioned answer of the whistleblower to the investigation report and the opinion of employer to the external authority. The Whistleblower will receive a copy of this document.

4.2.14. Internal and external investigation of the underprivilege of whistleblower

- 52. The Whistleblower or the persons concerned by the Article 4 of these regulations, who believe they were underprivileged following the reporting of a suspicion of irregularity, deviation or violation can request the commission for complaints to investigate the way in which the Whistleblower is treated by the other colleagues in the company.
- 53. The Whistleblower can also request the investigation department of the Chamber for integrity whistleblowers to investigate the way in which the employer behaved towards the whistleblower, following the reporting of a suspicion of irregularity, deviation or violation.

4.2.15. Publication, reporting and evaluation

- 54. The management makes sure that these regulations are published in intranet and made available to the public on the website of employer.
- 55. The Commission for complaints draws up an annual report about the policy for processing of reports of integrity whistleblowers and the application of these regulations. This report will always include the following information:
 - a) Information about the policies implemented during the last year;
 - b) Information about the number of reports and an indication about the nature of reports, the results of investigations and the opinions of employer;
 - c) General information about the experiences with the fight against the under privileging of whistleblower and the number of requests for investigation of prejudices in connection with the drawing up of a report.
- 56. The Commission for complaints sends the draft of this report for debating in a consultative meeting of the Enterprise committee/trade union.
- 57. The Commission for complaints gives the Enterprise committee/trade union the opportunity to express their opinion about this policy.

4.2.16. Coming into force of Regulations

- 58. These Regulations will produce effects on 01.01.2024.
- 59. These Regulations (of integrity whistleblowers) are posted for consultation on the website of Goodmorning B.V.
- 60. These Regulations are entitled "Regulations for reporting of suspicions of irregularities, deviations or violations of EU legislation".



5. UNDESIRABLE BEHAVIOUR

5.1. Introduction

The undesirable behaviour includes all the behaviours perceived as threatening, humiliating or intimidating by an individual or a group and against which the persons in question cannot defend themselves or can defend themselves to an insufficient extent. The undesirable behaviour can be considered the offensive behaviour which affects the safety of employees at workplace. It includes (sexual) harassment, aggression and violence, bullying and discrimination.

There are various forms of undesirable behaviour which can appear at workplace, both internally and externally, for instance, of customers. The Law on work safety and health identifies four such behaviours: sexual harassment, aggression and violence, bullying and discrimination. It depends on the employee who receives the attention to establish if the attention is desired or not.

Sexual intimidation can take different forms, such as sexual advances, requests for sexual favours or other verbal, non-verbal or physical behaviours with explicit sexual nature, which are perceived as undesirable. Among the examples of sexual harassment, we mention the sexual comments, jokes and allusions, display of images with sexual or pornographic nature, fixed stare or gestures with sexual hint and undesirable physical contact, such as an arm around shoulder, gripping, pinching, kissing, aggression or rape.

Aggression and violence include behaviours such as swearing, insults, physical violence, threats, intimidation or pressure.

Harassment is a repetitive negative behaviour from which someone cannot defend oneself. Among examples, we mention the denigrating and humiliating remarks, constant criticism, physical attacks, threats with violence, isolation, exclusion and ignoring a person, gossip, spreading of malevolent rumours, lies and false accusations.

Discrimination appears when people are unfairly treated, underprivileged or excluded based on personal characteristics. Examples of reasons of discrimination include race, nationality, gender, sexual orientation, religion or beliefs, disability and age.

5.2. Plan of steps – undesirable behaviour

Goodmorning Admin B.V. has drawn up a procedure in which, despite the prevention measures taken, there are incidents involving undesirable behaviour. We have appointed internal and external reliable persons and designated an independent Commission for investigation of formal complaints. The Commission for complaints will hear the persons directly involved and the witnesses involved (contradictoriality principle) and offers recommendations to management and board of directors regarding the well-foundedness of complaints.

In the procedure we make a distinction between formal and informal route. In both cases, the employee can resort to a reliable person for support. The employee will decide which route to follow.



5.2.1. Informal route

The informal route focuses on the resolution of problem without resorting to formal measures. The whistleblower and the author engage in a dialogue to discuss the problem and establish limits. The reliable person can help in this action. If the manager is the author of the deed, the board of directors will be involved. The informal route is less focused on investigation of deeds, but more on engaging a conversation about what the whistleblower perceives as desirable and on establishment and acceptance of limits.

5.2.2. Formal route

In some cases, the informal route is not an option or does not lead to a solution. In such cases, the whistleblower can follow the formal route or can resort to mediation. With a discussion with the reliable person, the whistleblower can establish whether the complaint will be submitted and whether the formal route will be initiated. The whistleblower can then submit an official complaint to the Commission for complaints.

5.2.3. Procedure for submission of formal complaints regarding the undesirable behaviour

5.2.3.1. Purpose of procedure:

This procedure is designed to allow the employees to submit a complaint in a professional and independent way in case an undesirable behaviour disturbs them at workplace. The purpose is to allow the employer to take well-founded measures to put a stop to the undesirable behaviour. It is also designed to carefully treat the accused person to assure an adequate independent judgment and to avoid the unjustified accusations.

5.2.3.2. Protection:

An official complaint will be treated on a confidential basis. Although it is not possible to keep anonymity in case of an official complaint, the reliable person with the Commission for complaints will make sure that the whistleblower will not suffer negative consequences after the submission of complaint. The accused will also benefit from an attentive treatment. The Employer makes sure that the whistleblower is not underprivileged in his/her position in the company if he/she resorts to the procedure for filing a complaint.

5.2.3.3. Confidentiality:

The whistleblower, the accused, the reliable person, the members of Commission for complaints and any other persons involved in the resolution of complaint must treat all the information about the complaint as strictly confidential. They will make sure that both the private life of the whistleblower and the private life of the accused are protected.

5.2.3.4. Change:

If a member of the Commission for complaints is personally involved in the complaint or is considered as involved, he/she will not participate in the resolution of complaint. In this case, another member of the Commission for complaints will be appointed, who will be responsible for the proper processing and settlement of complaint.



5.2.3.5. Procedure in Court:

If the Commission for complaints believes that this is about a criminal deed in the meaning of Criminal Code, this fact will be mentioned in the investigation report. The whistleblower has the right to declare the crime to the police. In certain specific cases, the employer reserves the right to give the declaration himself/herself. This procedure will not bring prejudice to the opportunity to initiate a legal action in Court.

5.2.4. Plan of steps - Procedure for filing a complaint

1. Submission of complaint

A complaint can be submitted by the complaint form from the website. The complaint must be submitted in writing to the Commission for complaints. The complaint will be recorded in the register of complaints and will be analysed by the Commission for complaints. If it is necessary, the reliable person can help the whistleblower to draw up the written complaint. The complaint submitted must contain at least the following information:

Description of undesirable behaviour

- Name, address, position and relationship of whistleblower with the accused person
- Name, department and position of the accused person
- Date, time, period and frequency of undesirable behaviour
- Location of undesirable behaviour(s)
- Materials provided as evidence to justify the complaint.
- The anonymous complaints cannot be considered, because the Commission for complaints must hear out the reasons of both Parties.

2. Determination of admissibility

Within two weeks from reception of complaint, the Commission for complaints will announce in writing the whistleblower and the accused person whether the complaint is admissible and whether it will be considered. If the complaint is founded, the Commission for complaints will send the accused a copy of complaint and of the procedure for complaints. The whistleblower has the right to withdraw his/her complaint until the time when the Commission for complaints issues a notification to the board of directors. The withdrawal will be made by a written communication addressed to the Commission for complaints. The Commission for complaints will decide for the problems which are not set out in this protocol, in consultation with the board of directors of Goodmorning Admin B.V.

3. Investigation

If the complaint is admissible, the commission for complaints will investigate the complaint. In this context, the Commission is authorized to request any information they believe it is necessary. The Commission for complaints has the right to obtain from the employer any information they need in the investigation they carry out. The Commission for complaints has the competence to hear out witnesses and consult experts, at the request of the whistleblower and/or the accused person or at own initiative. The Commission for complaints will hear out both Parties and will issue an independent and objective opinion. The hearings are with closed doors. Both the whistleblower and the accused person can request to be assisted in the



hearing by an assistant, for instance, a reliable person or a counsellor.

4. Elaboration of the report

Each hearing is recorded in a report. A copy of the report is sent to the whistleblower and to the accused person within seven working days from the hearing.

5. Recommendations

Within six weeks from the reception of complaint, the Commission for complaints will prepare a written investigation report, accompanied by a recommendation to the management of Goodmorning Admin B.V. If the report cannot be drawn up in time, the Commission for complaints will announce the whistleblower and the accused person, by specifying the reason. The deadline for presentation of report can be extended by maximum one month. In the investigation report, the Commission for complaints will present the well-foundedness of complaint and will issue recommendations to the board of directors and to the employer in relation to the measures that need to be taken. A copy of the report is sent to the whistleblower, the accused person and if applicable, to the reliable person and/or to the counsellor.

6. Decision

Within four weeks from the reception of recommendations from the Commission for complaints, the board of directors of Goodmorning Admin B.V. will draw up a motivated decision. This decision will be sent to the whistleblower, to the accused person and if applicable, to the reliable person and/or to the counsellor as soon as practicable.

5.2.5. Plan of steps – Procedure for filing a complaint in case of abuse of dominant position

5.2.5.1. Function of Commission for complaints

- 1. The Commission for complaints has the assignment to investigate complaints which have as object the abuse of dominant position.
- 2. The Commission for complaints was founded for the benefit of all the employees of our company.
- 3. The Commission for complaints offers recommendations to the management about the possible measures that can be taken as response to a complaint about the abuse of dominant position.
- 4. The Commission for complaints also offers recommendations to the management regarding the improvements of the policy for prevention of the abuse of dominant position.

The Commission for complaints processes the complaints related to the abuse of dominant position. The complaints processed by the Commission for complaints are of essential importance for all those involved and have a significant impact. Therefore, it is essential that the Commission for complaints treats these complaints very seriously and the recommendations offered to the management of our company are taken very seriously. In other words, the management has to clearly specify the way in which they tackle the recommendations of the commission for



complaints. This is not just to make justice to the whistleblowers of certain violations, but most importantly, to prevent the repetition and to prevent the appearance of such problems in other segments of our company.

5.2.5.2. Members of the Commission for complaints

- 1. The Commission for complaints is formed by at least 3 members, chosen from the group of LPC. Among them, a person is part of the organization for which the whistleblower works.
- 2. All the members of the Commission for complaints must have very good knowledge of the issues of abuse of dominant position and make a commitment on this subject.
- 3. The commission for complaints makes efforts to have members of both genders.
- 4. It is essential that this commission has a neutral position both towards the whistleblower and towards the accused person.

5.2.5.3. Procedure for complaints in case of abuse of dominant position

- 1. When the Commission for complaints receives a written complaint about the abuse of position from the reliable person, the commission members will be summoned within 14 days. The role of the reliable person is essential in this protocol. Without informing the reliable person, you cannot resort to the Commission for complaints, which means that the employees cannot address the commission directly. In the first step, this may seem an obstacle, but in fact the contrary applies. The reliable person operates as an accessible interface, because the employees are rather willing to address a single person than a whole commission for complaints. In addition, the reliable person is not obliged to take formal measures, when there is a notification, they decide together whether they should forward the complaint to the commission for complaints or not.
- 2. The Commission for complaints will discuss with the employee who submitted the complaint. If it is necessary, the reliable person can be present in this discussion.
- 3. The Commission for complaints will have a discussion with the person against whom the complaint was made. If the accused wants, he/she can invite to this discussion his/her own reliable person, or a counsellor chosen by him/her.
- 4. After the discussion with the Parties involved took place, the Commission for complaints will draw up an official report as soon as possible, and the Parties involved will sign the report. Thus, they confirm that they have read the report and agree to the drawing up of own comments.
 Signing the official report is an essential part of the procedure. By proceeding this
 - Signing the official report is an essential part of the procedure. By proceeding this way, the commission avoids the subsequent discussions regarding the way in which the whistleblower and the accused perceived the incident. Moreover, the signature confirms that the contradictoriality principle was observed. As the Parties sign only for the correct illustration of their own statements, the whole procedure does not generate discussions about who is right and whether the complaint is founded or not. The opinion in this respect belongs to the commission.
- 5. If it is necessary, the Commission for complaints will resort to experts to offer recommendations related to the relevant issues.
- 6. If the Commission for complaints believes that the complaint is founded, it will inform in writing the management of Goodmorning Admin B.V. about the possible measures that can be taken. If the management chooses not to follow these recommendations, they must justify themselves to the Commission for complaints.



- The Commission for complaints sends a copy of recommendations to all the Parties involved.
- 7. If the Commission for complaints believes that the complaint is unfounded, it will inform in writing with motivation the persons in question regarding this decision.
- 8. The whole procedure for formulation and settlement of a complaint must not exceed three months.

5.2.5.4. Confidentiality

- 1. The Commission members are obliged to keep strictly confidential all the information of which they take knowledge as members of the Commission for complaints or related to which they issue recommendations.
- 2. The members of the Commission for complaints will not provide third parties with copies of reports, opinions or other documents regarding a complaint without the prior consent of the Parties involved.



6. POLICY FOR PSYCHOSOCIAL RISKS AT WORKPLACE (PSA)

6.1. Introduction

This PSA policy declaration has the purpose to protect the employees from the psychosocial risks at workplace and to be observed the legal obligations in this field. We are aware of our responsibility to create a work environment devoid of discrimination, harassment, intimidation, aggression and violence. Therefore, so that we can fulfil this responsibility, we have drawn up this policy.

6.2. Plan of steps - PSA Policy

1. Definition

Psychosocial risk at workplace (PSA): the pressure and tension felt by employees because of undesirable behaviours such as discrimination, harassment, intimidation, aggression and violence at workplace.

2. Responsibilities

The Management is finally responsible for the implementation and enforcement of this policy. Managers are responsible for creation of a safe and healthy work environment and for taking adequate measures against PSA. The employees should be aware of their own behaviour and should treat their colleagues with respect and not manifest undesirable behaviours.

3. Prevention

The management assures a safe work environment in which the employees feel supported to report the PSA-related incidents. The employees can report such incidents to the line manager and can also address the reliable person.

4. Measures

The procedure for submission of complaints can be applied by analogy and is described in item 5.2.4. If it is necessary, the employer will take the right measures according to the situation.

5. Sanction

The Employer has the right to impose the disciplinary measure set out by Article 10 of Regulations, according to Article 7:629 of Civil Code if this protocol is violated, depending on the severity of violation.



7. ADM: POLICY IN MATTERS OF ALCOHOL, DRUGS AND MEDICATION

7.1. Introduction

An important part of a safe and healthy work environment is the prevention of risky behaviour such as the consumption of alcohol, drugs and medication during the work schedule or to come to work under their influence. This policy contains directives regarding the consumption of alcohol, drugs and medication at workplace and prevention of addiction. By the enforcement of this policy, we assure together a safe and healthy work environment for our employees.

7.2. Plan of steps – ADM Policy

This policy contains guidance about the consumption of alcohol, drugs and medication at workplace.

1. Alcohol, drugs and medication

It is strictly prohibited to consume alcohol or other psychotropic substances at work or to come to work under their influence. Also, it is strictly prohibited to hold alcohol or drugs at workplace. The use of medicines that can affect the state of awareness is allowed, if they are prescribed by an authorized doctor. If the employees take medication that can alter their state of consciousness, they must immediately report it to the line manager. This is for the purpose to assure the safety at workplace and quality of work.

2. Exceptions from interdiction

The general interdiction regarding the consumption of alcohol can be lifted only with the explicit consent of the employer for special occasions. The consumption of drugs or coming to work under the influence of drugs is prohibited at any time and we cannot grant any derogation in this respect. If the permission of deviation from the interdiction of alcohol consumption is granted, the employees should prove moderation when it comes to consumption and service of alcohol. The ebriety is strictly prohibited.

3. Use of work machines

It is strictly prohibited to drive a vehicle when you are under the influence of drugs, alcohol or medication which affects the state of consciousness during work. It is strictly prohibited to drive a car when you are under the influence of drugs, alcohol or medication which affects the state of awareness both during and out of working hours. You may think here of a car bought in leasing, a minibus or a job bike. The use of company equipment under the influence of alcohol and drugs is strictly prohibited. This applies not only to the equipment mentioned above, but also explicitly to other similar equipment. The use of equipment after or during you consume medicines which can alter the state of awareness is permitted, if they are prescribed by an authorized doctor.

4. Sanction

The Employer has the right to impose the disciplinary measures set out by Article 10 of Regulations, according to the Article 7:629 of Civil Code in case of violation of this protocol, depending on the severity of violation.



8. REGULATIONS FOR DISCIPLINARY MEASURES

General

- 1. Goodmorning Admin B.V. can apply a disciplinary measure to the employee who:
 - a. violates the employment contract and/or the regulations applied in the organization, among other things, the employment contract, the staff manual and code of conduct;
 - b. violates the law;
 - c. commits an offence/crime.
- 2. Goodmorning Admin B.V. takes into account the nature and severity of the offence/crime when it applies a disciplinary measure.
- 3. Goodmorning Admin B.V. will carry out a thorough investigation before applying any disciplinary measure. The investigation will always include the application of contradictoriality principle (where it is possible).
- 4. Goodmorning Admin B.V. can in addition to the legal possibilities impose the following disciplinary measures to the employee:
 - a. a written warning;
 - b. Reduction of annual leave days.
 - c. no bonus or reduction of bonus.
 - d. not granting a wage increase or a promotion.
 - e. demotion
 - f. Transfer
 - g. Suspension or referral to technical unemployment
 - h. dismissal with immediate effect

Written warning

- 1. Goodmorning Admin B.V. will send a written warning if a violation is repeated, despite the verbal warnings received previously.
- 2. Goodmorning Admin B.V. can send a written warning without prior verbal warning when the nature and severity of violation justifies it.
- 3. The written warning will be recorded in the staff file of the company Goodmorning B.V.

Annual leave days

- 1. Goodmorning Admin B.V. can offer an employee who, for instance, is regularly late at work, the possibility to choose either to renounce to the leave hours for the non-worked hours, or to waive the wages for the non-worked hours.
- 2. Goodmorning Admin B.V. will take the measure mentioned at item 1 only if the previous verbal or written warnings did not have any effect.

Not granting a wage increase, a bonus or a promotion

1. Goodmorning Admin B.V. can decide not to grant a promotion, a wage increase and/or a bonus.

Demotion and transfer

1. The employee can be placed in an inferior position and/or transferred to another unit.



2. Goodmorning Admin B.V. will apply the measures from item 1 only if the severity of violation is of such nature that justifies a demotion and if a careful weighing of interests took place.

Suspension or referral to technical unemployment

- 1. The Employee can be temporarily refused access to workplace.
- 2. Goodmorning Admin B.V., as a good employer, puts in balance the interest of the employee to allow access to workplace and the interest of suspension or technical unemployment before taking the decision of suspension or referral to technical unemployment.

Dismissal with immediate effect

- Goodmorning Admin B.V. reserves the right instead of any other disciplinary measure – to dispose the dismissal with immediate effects if the circumstances require it.
- 2. Goodmorning Admin B.V. can proceed to dismissal with immediate effect only with the observance of Articles 7:677 and 7:678 of Civil Code.



PRIVACY STATEMENT

GOODMORNING BV has its registered office in Penningweg 25, 4879 AE, Etten-Leur.

GOODMORNING is a Data Controller in the meaning of GDPR and therefore, holds control over the processing of personal data and determines the purpose and means of processing. This confidentiality declaration establishes the confidentiality policy of GOODMORNING.

By GOODMORNING BV we understand:

GOODMORNING SP.ZO.O.

Al. Mickiewicza 5a 77-400 Złotów, Poland PL7671635189

PERFECT SOLUTION SP.ZO.O.

Al. Mickiewicza 5a 77-400 Złotów, Poland PL7671634617

PERFECT AT WORK HOLLAND SRL.

Marasti nr 18 . bl.3 sc.C parter SUCEAVA, Romania

GOODMORNING UKRAINE

O.Kobylianska 7 office 2 58002 Chenivtsi, Ukraine

This Privacy Statement applies to the processing of personal data by various websites such as, inclusively: www.goodmorning.pl, www.goodmorning.nl, www.goodmo

GOODMORNING BV (hereinafter referred to as: GOODMORNING) pays a special importance to the protection of confidentiality and your data (personal data). The term "personal data" refers to data obtained online and offline from stakeholders, such as: website users, applicants to jobs, employees and customers. Therefore, these data are carefully processed and secured, and GOODMORNING is responsible for the processing. By our Privacy Statement we offer you information about the data we collect and process, the reasons for which we collect and process these data and the way in which you can request the changing or erasure of these data. Thus, you will understand exactly how we work and operate.

If you provide information at your own initiative, we will use the information according to our Privacy Policy. All the data which GOODMORNING obtained are processed and secured with the utmost care, according to the requirements set out in the General Data Protection Regulation (GDPR).

What types of personal data do we collect and process?

GOODMORNING collects and processes only your personal data that are necessary for the supply of services, for instance for hiring and processing of wages.

We process these data to respect the requirements and desires of employees and of the customer/beneficiary. Access to these data is limited to employees/third parties for which they are necessary for the carrying out of activities. As we, as temporary work company, are responsible for the accuracy of these data, we will regularly ask you if the data provided are still correct.

By personal data we understand: all the data by which you can identify a natural person. For instance, name and address, email addresses, phone numbers, numbers of employees, date of birth,



gender, nationality, professional experience and education, IP addresses and connection details. By special personal data we understand: all the data which show the racial or ethnic origin of a person, political opinions, religious or philosophical beliefs and health status. In principle, we do not process special personal data unless a legal exception is applied, and it is strictly necessary to process them for this purpose. GOODMORNING cannot be held responsible for the data you provide. The data are stored on own secured servers of GOODMORNING or those of a third party. We will not combine the personal data with other personal data we hold.

WHY DO WE COLLECT AND PROCESS PERSONAL DATA?

We collect your data to be able to provide the services. Our services include mediation, temporary hiring, secondment, recruitment and selection, personal development and professional integration, administration of wages and staff management.

We process personal data for the following reasons:

- Mediation in work problems
- Establishing identity
- Observance of employment contract (including the administration of wages and pensions)
- Hiring (car contract)
- accommodation (lease agreement)
- observance of legal obligations (including canteen, sick leave)

We process the personal data of customers for the following reasons:

- to send you offers and to inform you about our services and activities. Finally, to better tailor and adjust the information to your needs and requirements in matter of information.
- Thus, we can contact you for commercial offers such as campaigns and newsletters. To receive newsletters, you need to subscribe to them. You can also unsubscribe easily by using the unsubscribing link from the bottom of the newsletter.
- To evaluate your skills and your availability to fill a position and to hire you for a period of 1 year or more years (throughout the year).
- To be able to establish and maintain a hiring or employment relationship with you and to carry out administrative activities for this purpose.
- To convert an order into a contract signed by GOODMORNING and the user/customer company and to maintain and perform this contract with the beneficiary/customer company.
- To be used for management purposes, for security reasons and to carry out audits and accounting expert examinations and reports.
- To obtain certifications.
- All this to comply with the laws and regulations since we have signed an employment contract or a work mediation contract with you.

HOW DO WE MANAGE THE PERSONAL DATA OF CUSTOMERS OBTAINED THROUGH OUR WEBSITE?

GOODMORNING collects and uses your personal data to provide the services and formalities you requested. If you request information or an offer by using the contact form, we will request your name, email address and possibly, a few extra details. We use your data exclusively for processing your request. When you send us a request, an email or other messages, it is possible for use to store these messages.

We store data which tell us something about the use of our website, for instance, the number of visitors for a certain period, the countries from which our visitors come and the webpages that are most frequently visited. We record you IP address and your domain name. To adjust the facilities and characteristics to the user equipment, we also keep records of the type of browser you use to access our website. The information obtained is the property of GOODMORNING. The information is used to improve our services and possibly,



the marketing activities we carry out. In any case, the information obtained through our website will not be leased or sold to third parties. We also collect data when you or other persons post them on public resources such as social media, when you express your interest for our services. In this situation, we will approach you and contact you with the observance of our terms and conditions and with the observance of our Privacy Statement. If you are not interested, we can process relevant data to process correctly your request of not being approached.

HOW DO WE MANAGE THE PERSONAL DATA OF TEMPORARY WORKERS OBTAINED THROUGH OUR WEBSITE?

If you register as temporary worker through one of our websites and you agree to work by intermediary, GOODMORNING will contact you to complete your file. If you are recruited as temporary worker for GOODMORNING, you will be allotted a username and a password by email. With this username and password, you can connect to GOODMORNING application and to the GOODMORNING portal. You can connect to the GOODMORNING portal through our website, and you can download the application from our website. When you connect for the first time, you will be asked to change your password. In the portal you only have access to your data, because you have only read rights. If you want to change your data in the portal, you can do this only through GOODMORNING. You can call us or send us an email to update your data. You can also change your data yourself in app. You can also use the app to digitally sign personal documents.

GOODMORNING collects and uses your personal data to operate the website GOODMORNING and to work as intermediary between you as temporary worker and the employers/our customers. If you contact us by using the contact form, we will request your name, email address a few extra details. We use your personal data exclusively for the processing of your request. When you send us a request, an email or other messages, it is possible for us to store these messages.

We store data which tell us something about the use of our website, for instance, the number of visitors for a certain period, the countries from which our visitors come and the webpages that are most frequently visited. We record you IP address and your domain name. To adjust the facilities and characteristics to the user equipment, we also keep records of the type of browser you use to access our website. The information obtained is the property of GOODMORNING. The information is used to improve our services and possibly, the marketing activities we carry out. In any case, the information obtained through our website will not be leased or sold to third parties. We also collect data when you approach us on social media and thus, you express your interest in our work mediation services. In this situation, we will approach you and contact you with the observance of our terms and conditions and with the observance of our Privacy Statement. If you are not interested, we can process relevant data to process correctly your request of not being approached or registered.

USE OF COOKIE MODULES

GOODMORNING uses cookie modules when it offers its services. A cookie module is a file of small sizes sent together with the pages of our website and stored by your browser on the hard disk of your computer. We use cookie modules to remind us of your settings and preferences. You can deactivate these cookie modules through your browser. The way in which you can do this varies depending on your browser, please consult the help function of your browser. You can also set up your browser to renounce completely to receiving cookie modules, but this limits the user experience of website.

Cookie modules are also saved by Analytics service of the Google company. We use Google Analytics to monitor and obtain reports regarding the way in which the visitors use the website. Google can provide this information to third parties if Google is legally obliged to do it or to the extent that these third parties process information on behalf of Google. As for these operations, we have no control whatsoever. The privacy of our website visitors is respected by all our employees. The information and personal data will be kept strictly confidential, including by third parties responsible for the security of storage of your data and will not be used for other purpose except those mentioned here.



GOODMORNING NEWSLETTER

In addition, we send a newsletter by which we want to inform the interested partis about our services and related issues. Your email address will be added to the list of subscribers only with your explicit consent. Each newsletter contains a link by which you can unsubscribe. The email address file of the newsletter is not provided to third parties. In the newsletter we refer to our Privacy Statement.

SAFETY OF PERSONAL DATA

GOODMORNING assures the adequate organizational, technical and physical security of your personal data. GOODMORNING safety stores the personal data you send on the servers in a controlled and safe environment, protected against unauthorized access, use or disclosure. If the data are provided to third parties who process data and provide services or carry out activities on behalf of GOODMORNING, GOODMORNING has agreed with them so that they secure the personal data in optimal condition.

SHARING OF PERSONAL DATA/TRANSMISSION TO THIRD PARTIES

GOODMORNING will always be responsible for adequate protection of the personal data transmitted. GOODMORNING does not sell and does not lease lists of customers to third parties. GOODMORNING will never disclose your personal data without notification, unless we are obliged to do this by law or we believe that such an action is necessary for:

- Compliance with a request according to the law or a trial in Court:
- Protection and defence of the rights and property of the company GOODMORNING;
- Acting in emergencies for the protection of personal safety of users of GOODMORNING or the public.

GOODMORNING, as Data Controller, has signed processing agreements with all the third parties who process personal data of GOODMORNING to assure the adequate processing of personal data.

STORAGE PERIODS OF PERSONAL DATA

GOODMORNING does not store your personal data for a longer period than it is necessary and stores data only to achieve the purposes for which the data are collected. The storage periods applied by GOODMORNING depend on the legal storage periods applicable. We except from this rule the data which GOODMORNING must store for a longer period, because the law obliges us to do it. In this action we make a distinction between a registered temporary worker, a hired temporary worker and a temporary worker who is no longer hired. More information about the storage periods can be found in the annex.

STORAGE PERIOD OF DATA OF A REGISTERED TEMPORARY WORKER

By registered temporary worker we understand a person who was registered as temporary worker but has not worked yet for GOODMORNING. If a registered temporary worker wants to be represented by the employment agency GOODMORNING, we have the right to store the relevant data. GOODMORNING has the right to keep a copy of the identity document of a candidate if it is necessary, with a maximum of four weeks. If it is necessary and legitimate, the data can be stored for a longer period. In case of a claim or a complaint, GOODMORNING can store the relevant data to the extent that it is necessary for the handling of this claim or complaint or until it is prescribed. More information about the storage periods can be found in the annex.



STORAGE PERIOD OF DATA OF HIRED TEMPORARY WORKER

By hired temporary worker we understand a person who works for GOODMORNING and with whom GOODMORNING has signed a temporary work contract. If the temporary worker works for GOODMORNING, GOODMORNING can store the personal data. For the special personal data such as data about health and sick leaves, different rules apply. You can find these rules on the website of ABU www.abu.nl. More information about the storage periods can be found in the annex.

STORAGE PERIOD OF DATA OF A FORMER TEMPORARY WORKER

The personal data of a temporary worker who worked in the past for GOODMORNING must be in principle erased two years from the date when the temporary worker was still working for GOODMORNING. Certain data must be stored for a longer time by GOODMORNING if there is a minimal legal storage period for this purpose. Think for example, about data meant for the Fiscal Administration. More information about storage periods can be found in the annex.

Storage period of personal data of business partners

GOODMORNING stores the contact data of employees of customers, suppliers and other entities with which GOODMORNING maintains a business relationship. We process these data to send offers and to provide information about our services, to maintain a business relationship and to sign and maintain a work order contract. They include personal data such as: name, contact data and positions of contact persons. GOODMORNING can transmit these data for mediation purposes. These data can be transmitted to other business partners and data controllers who provide services on behalf of GOODMORNING or if GOODMORNING is obliged to transmit these data by a Court order. More information about the storage periods can be found in the annex.

YOUR RIGHTS

You have right at any time to request the data we hold about you and if you want, you can change them or erase them (or you can request their erasure). In this case, you can send an e-mail to: info@goodmorning.eu. To make sure that you are the person who sent the request, please send us a copy of your identity card with the request. On this copy, please cover in black the passport photograph MRZ (machine readable zone, the band with numbers from the bottom of passport), the passport series and the social-fiscal number (BSN). This is for the purpose of protecting your privacy. GOODMORNING will answer your request as soon as possible, within maximum thirty working days.

CHANGING YOUR CONTRIBUTION %

This Privacy Statement can be changed. GOODMORNING will regularly update this Privacy Statement to reflect the feedback of the company and of the customers. GOODMORNING encourages you to consult regularly the Privacy Statement to be informed about the way in which GOODMORNING protects your confidentiality and personal data.

CONTACT

GOODMORNING would like to receive your feedback about our Privacy Statement. If you believe that GOODMORNING did not act in compliance with this policy, please contact GOODMORNING to the email address: info@goodmorning.eu.

