

PROTOCOLS

Code of Conduct

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1. SICKNESS ABSENCE PROTOCOL

Introduction

This sickness absence policy applies to all employees employed by Goodmorning B.V.

General

Illness and incapacity for work are, first and foremost, unpleasant for the people affected. However, sickness absence also has consequences for the client and for Goodmorning B.V. The client may have to manage without a well-trained and experienced worker for a shorter or longer period. In addition, sickness absence results in considerable costs.

In accordance with the Dutch Civil Code, the applicable Collective Labour Agreement (CLA), or the client's company-specific regulations where you perform your work, Goodmorning B.V. is obliged to continue paying at least 70% of your daily wage during incapacity for work. This obligation can continue for a maximum period of 104 weeks. For both the first and second year of sickness, the maximum entitlement is based on the statutory maximum daily wage.

Our Occupational Health Service: Arbo.nu | Occupational Health Service

Goodmorning B.V. has contracted Arbo.nu Occupational Health Service. The occupational physicians at Arbo.nu assess, among other things, whether you are entitled to sickness benefits when reporting sick.

To enable this assessment, you must comply with the rules set out in this sickness absence protocol. When you report sick to Goodmorning B.V., your report will be handled by your Recruitment Consultant (Intercedent). The Recruitment Consultant will remain in contact with you and will agree with you on the expected duration of your absence.

Sanctions

Please note that if you fail to comply with the rules below and/or do not cooperate with the Occupational Health Service's assessment, your entitlement to sickness benefits and/or supplementary payments may be reduced or withdrawn.

1.1 Sick – What Now?

1.1.1 Procedure for Reporting Sickness

If you are ill, you must report your sickness at least two hours before the start of your shift via the Plan4Flex App using the absence notification option: Illness Request. If you are unable to report your sickness yourself, someone from your immediate surroundings may do this on your behalf. If your sickness report is submitted too late, unfortunately we may not be able to process it and it may be rejected. If you leave work due to illness, you must report your sickness on the same day.

If you work evenings or weekends, you must also report your sickness for those shifts. Sickness notifications are not processed retrospectively unless there is a valid reason why you could not report your sickness earlier, such as an emergency hospital admission.

During incapacity for work, Dutch legislation applies. In the Netherlands, you are entitled to continued payment during sickness in accordance with the conditions applicable at the client where you are scheduled to work. Only an occupational physician can determine whether you are unfit for work. You may provide a letter from your GP or specialist; however, only the occupational physician can determine the extent of your incapacity for work and what opportunities exist for suitable or adjusted duties.

1.1.2 Urgent Appointment

If necessary, Arbo.nu Occupational Health Service may invite you to an urgent consultation with the occupational physician.

1.1.3 Your Obligations When Receiving Sickness Benefits

You have reported sick and may therefore be entitled to benefits. Goodmorning B.V. is not a self-insured employer. This means that in some situations you may receive benefits from the Dutch Employee Insurance Agency (UWV). Together with you, we are responsible for your reintegration into work. From the moment you report sick, you have several obligations. These are described in the Sickness Benefits Act Control Regulations (Controlevoorschriften Ziektewet).

1.1.4 Make Sure You Are Reachable

Goodmorning B.V. wants to know how you are doing and when you expect to be able to return to work. Every day before 18:00, you must briefly inform us of your possibilities for working the following day. While you are sick, you must remain reachable for Goodmorning B.V. If you are unreachable or do not respond to our messages, this may negatively affect the payment of your sickness benefits. If you have a new telephone number, please update it through the Plan4Flex App.

1.1.5 Home Visit During Sickness

It is important for us to know how you are doing during your illness. Therefore, we may occasionally visit you in person while you are absent due to sickness. These visits take place in the morning before 12:00 noon. The absence officer must be able to contact you. If you are staying at a different address during your sickness absence, you must inform Goodmorning B.V. If you are not present when we visit, you will receive a notification card or message. You must always respond. Failure to do so may affect your entitlement to benefits.

1.1.6 Work on Your Recovery

During your illness, you must do everything reasonably possible to recover as quickly as possible. Make sure you get sufficient rest and take good care of yourself.

Do not use alcohol or drugs. Engage only in activities that support your recovery.

1.1.7 Payment of Sickness Benefits

Your sickness hours are calculated based on the average number of hours worked during the previous 13 weeks.

1.1.8 Temporary Employment Contract Without Agency Clause

If you have a temporary employment contract without an agency clause, you are entitled to: 90% of your salary during the first year of illness (with a minimum of the statutory minimum wage); 80% of your salary during the second year of illness. The first day of incapacity for work is considered a waiting day, for which no salary payment is due. Under the ABU Collective Labour Agreement for Temporary Agency Workers, you are entitled to a supplement on top of the statutory sickness benefit: 20% during the first year of illness; 10% during the second year of illness. To enable us to pay this supplement, you must provide Goodmorning B.V. with details of the benefits you receive.

If your contract with Goodmorning B.V. ends while you are ill, you will fall under the Dutch safety-net scheme (vangnetregeling). You will be entitled to at least 70% of your sickness benefit daily wage during your illness. The UWV will determine whether you are entitled to these benefits. You must remain reachable and respond to all correspondence received from the UWV.

1.1.9 Occupational Health Service

Goodmorning B.V. works together with Arbo.nu Occupational Health Service.

You will receive an invitation from our Occupational Health Service to attend an appointment with the occupational physician. Please note that attending this appointment is mandatory. If you are genuinely unable to attend, you must discuss this with your Recruitment Consultant.

If you do not attend the appointment, or if you fail to cancel according to the guidelines (at least 48 hours before the appointment), the costs of the appointment may be charged to you.

If the occupational physician has declared you fit for work but you are still ill on that day, you must inform us immediately by telephone.

1.1.10 Bring a Valid Identity Document

If you attend an appointment with the occupational physician or if we visit you at home, you must show a valid identity document. During the first contact, this may be: Passport, Identity card, Residence permit. For follow-up appointments, a driving licence is also accepted. If someone accompanies you, they must also carry a valid identity document.

1.1.11 Cooperate with Your Reintegration

You are required to actively cooperate with your reintegration.

This means doing everything possible to return to work as soon as reasonably possible. If you are absent due to illness for longer than six weeks, you and your Recruitment Consultant from Goodmorning B.V. will prepare a Plan of Action together. Both parties must sign this document. The Plan of Action contains the agreements made regarding your reintegration activities.

1.1.12 Accept Suitable Work

Sometimes you may not be able to perform your own job because of your illness, but you may still be able to carry out other suitable work. The type of suitable work depends on:

Your medical condition; How long you have been ill.

The occupational physician determines, together with you, what work is suitable. You are required to accept suitable work, even if it is below your usual level or position. You are not required to perform suitable work while you are on holiday, for a maximum of four weeks per year.

1.1.13 Report Any Changes

Any changes in your personal situation may affect the amount or duration of your sickness benefits. You are therefore required to inform Goodmorning B.V. immediately if any of the following changes occur:

- Your contact details change.
- You travel abroad (only after consultation with Goodmorning B.V. and approval from the occupational physician).
- You go on holiday (only after consultation with Goodmorning B.V.).
- Your income increases or decreases.
- You stop working.
- You receive additional income besides your salary, such as supplementary benefits.
- Your health condition changes.
- Your personal circumstances change.
- You move house.
- Your bank account changes.
- You are admitted to hospital.
- You are detained.
- You become pregnant or are ill due to pregnancy or childbirth.

1.1.14 When You Have Recovered

As soon as you are fit to return to work, you must report your recovery to Goodmorning B.V. in advance using the Plan4Flex App.

If the occupational physician has declared you fit for work but you are still unwell on that day, you must immediately inform Goodmorning B.V. by telephone.

1.1.15 Comply With Your Obligations

It is important that you comply with all obligations described in this protocol. If you fail to do so, you may temporarily receive reduced or no salary and/or be fined. Further information can be found in the Dutch Social Security Measures Decree (Maatregelenbesluit Socialezekerheidswetten). If you receive benefits to which you were not entitled, you will be required to repay the overpaid amount.

1.1.16 Dutch Gatekeeper Improvement Act (Wet verbetering Poortwachter)

The Dutch Gatekeeper Improvement Act was introduced to reduce long-term sickness absence. The law requires both the employer and the employee to work together to ensure that an employee returns to work as quickly and responsibly as possible.

The Act sets out the obligations of both parties. As an employee, you are expected to take an active role and show initiative throughout the mandatory reintegration process, with the aim of returning to work.

1.2 Procedure – Dutch Gatekeeper Improvement Act

1.2.1 Day 1

You report your sickness via the Plan4Flex App and, if applicable, to your supervisor at the company where you work, following the procedure described above. Goodmorning B.V. reports your sickness to Arbo.nu Occupational Health Service. Goodmorning B.V. will contact you to discuss the reason for your sickness report and the expected duration of your absence.

1.2.2 Week 6

If you have been ill for six weeks, you will receive an invitation to attend an appointment with the occupational physician. The occupational physician prepares a Problem Analysis, describing why you are unable to work; your recovery possibilities; the expected date on which you may return to work.

1.2.3 Week 8

Within eight weeks after reporting sick—or no later than two weeks after the Problem Analysis—the employer and employee prepare a Plan of Action together. This plan describes the efforts both parties will make to support your return to work.

The Plan of Action forms part of your reintegration file and must be signed by both the employer and the employee.

1.2.4 Regular Progress Reviews

The employer and employee must meet at least once every six weeks to discuss progress. If necessary, the Plan of Action may be adjusted. The employer is responsible for ensuring that the occupational physician remains regularly involved in monitoring your incapacity for work.

1.2.5 Week 42

In week 42, the employer must report your long-term sickness absence to the UWV.

1.2.6 Week 50

Before the start of your second year of sickness absence, you and your employer will review your reintegration process together. You will discuss whether any additional measures can be taken to help you return to work.

1.2.7 After 20 Months

If you have still not fully returned to work after 20 months, you will receive a WIA application form from the UWV during week 87. Important: You must return this form to the UWV within three weeks. The UWV will then assess your reintegration file and carry out a WIA assessment. More information can be found at: Dutch Gatekeeper Improvement Act | Arboportaal

1.3 Sickness Absence Regulations

1.3.1 Implementation of the Sickness Absence Regulations

All parties share responsibility for implementing these sickness absence regulations. You are expected to be familiar with the procedures described in this document and to comply with them at all times.

1.3.2 Parties Involved in the Sickness Absence Process

The following parties are involved in the management of sickness absence: The employee The client (company where you work), The employer (Goodmorning B.V.), Arbo.nu Occupational Health Service. Each party has its own responsibilities.

1.3.2.1 Employee Responsibilities

If you are unable to work because of illness, you are required to:

- Cooperate with any measures introduced by the employer or by specialists appointed by the employer.
- Cooperate in preparing, evaluating and updating the Problem Analysis and the Plan of Action (PoA) for your reintegration.
- Carry out suitable work offered by the employer.

- Actively cooperate with your reintegration under the Dutch Gatekeeper Improvement Act (Wet verbetering Poortwachter) and/or the Dutch Sickness Benefits Act (Ziektewet).
- Maintain regular contact with your employer and, where applicable, the client.
- Ensure that no false information was provided when you started your employment.
- Avoid any activities during your sickness absence that could delay or prevent your recovery.

If Goodmorning B.V. determines that you have breached these regulations, the incident will be recorded. The employer has the right to impose disciplinary measures in accordance with Article 10 – Disciplinary Measures and Article 7:629 of the Dutch Civil Code.

1.3.2.2 Client Responsibilities

The client is required to:

- Take appropriate measures as quickly as possible to enable the sick employee to return to their own work or to suitable alternative work.
- Contribute to preventing sickness absence and support the guidance and reintegration of employees working under the client's responsibility.

1.3.2.3 Employer Responsibilities

The employer's responsibilities include:

- Identifying sickness absence at an early stage.
- Providing support throughout the reintegration process.
- Monitoring compliance with the Dutch Gatekeeper Improvement Act.
- Supporting the preparation and implementation of the Plan of Action.

1.3.2.4 Responsibilities of Arbo.nu Occupational Health Service

The occupational physician, delegated medical professional and case manager from Arbo.nu Occupational Health Service support the employer throughout the sickness absence process.

Main Responsibilities of the Absence Coordinator / Recruitment Consultant

- The Absence Coordinator (Recruitment Consultant) is responsible for:
- Maintaining telephone contact with the employee.
- This contact may result in one of the following:
- Agreeing a return-to-work date.
- Referring the employee to the occupational physician.
- Scheduling additional telephone follow-up conversations.
- Advising the employer on legal and employment-related matters.

The Recruitment Consultant also:

- Holds face-to-face sickness absence meetings to monitor progress.

- Conducts reintegration meetings to prepare or update the Plan of Action.
- Refers employees to external specialists where necessary, for example:
 - an earlier appointment with the occupational physician;
 - occupational social work;
 - a reintegration agency;
 - an urgent home visit by an absence inspector.
- Provides process guidance throughout the sickness absence period.

Main Responsibilities of the Occupational Physician

- The occupational physician is responsible for:
 - Assessing the employee's fitness for work.
 - Providing medical guidance during sickness absence.
 - Giving an expected return-to-work prognosis.
 - Preparing the Problem Analysis under the Gatekeeper Improvement Act.
 - Advising both the employee and employer on preventive measures.
- Powers of the Occupational Physician

The occupational physician may:

- Invite the employee for a consultation.
- Agree a return-to-work date with the employee.
- Carry out a medical examination.
- With the employee's written permission, contact:
 - the employee's GP;
 - medical specialist;
 - other healthcare professionals (for example occupational social workers).

Delegated Medical Professional

The occupational physician may delegate certain responsibilities to a delegated medical professional. The delegated medical professional (not the case manager): explains the purpose of the contact; may ask questions about your medical condition; records this information; forwards the information to the occupational physician.

Based on this information, the occupational physician makes an initial assessment and determines the next steps.

After every consultation, Arbo.nu Occupational Health Service provides the Absence Coordinator with a written summary of: the agreements made; any relevant work restrictions;

the employee's possibilities for reintegration. This information may be used during sickness absence meetings and is stored in the reintegration file in accordance with the Dutch Gatekeeper Improvement Act.

Medical Confidentiality

The occupational physician is bound by medical confidentiality. The case manager and delegated medical professional are also bound by professional confidentiality.

Communication between Arbo.nu Occupational Health Service and Goodmorning B.V. is limited to: work restrictions; work capabilities; reintegration possibilities.

No confidential medical information is shared. Arbo.nu Occupational Health Service works in accordance with the General Data Protection Regulation (GDPR).

1.3.3 Holidays During Sickness

If you wish to take annual leave while you are on sick leave, you must first discuss this with your Absence Coordinator / Recruitment Consultant. If necessary, the occupational physician will assess whether your planned holiday could negatively affect your recovery. Approved holiday hours will be deducted from your holiday entitlement. If you are partially unfit for work, full holiday hours will still be deducted, as holiday entitlement continues to accrue during both worked hours and sickness absence. If you choose to use or have your holiday hours paid out, these hours will also be deducted from the payment of your sickness absence hours.

1.3.3.1 Reporting Sick or Recovered During Your Holiday

If you report sick while you are on holiday, you must also report when you have recovered.

This can be done by:

- reporting your recovery while still on holiday; or
- reporting your recovery on the day you return to work.

1.3.3.2 Reporting Sick While on Holiday

If you become ill during your holiday, you must report your sickness using the normal sickness reporting procedure. You must provide a medical certificate from a doctor confirming that you are unable to work. You must also remain reachable by telephone for your Absence Coordinator/ Recruitment Consultant. If necessary, you may be asked to attend an appointment with an occupational physician at the nearest available consultation location. All other rules in this sickness absence protocol also apply.

1.3.3.3 Reporting Your Recovery While on Holiday

If you recover while you are still on holiday, you must report your recovery as soon as possible, and no later than 09:00 on the first working day, using the Plan4Flex App.

When you return home, you must provide the occupational physician with a medical certificate issued by a local doctor.

This certificate must:

- be written in English or Dutch;
- clearly describe the illness or medical condition;
- state the duration of the illness;
- explain, where applicable, why you were unable to return home on the agreed date.

If there are any doubts regarding your sickness report, Goodmorning B.V. may ask the occupational physician to contact your treating doctor abroad.

1.3.3.4 Appointment With the Occupational Physician After Returning From Holiday

After returning from your holiday, you may be asked to attend an appointment with the occupational physician, even if you have already recovered.

During this appointment you must provide evidence supporting your sickness report, such as:

- a doctor's certificate;
- prescriptions;
- medication packaging with your name on it;
- or other medical documentation.

These documents are required to confirm that you were genuinely unable to work during your holiday.

1.3.4 Cosmetic Procedures

If you undergo a cosmetic procedure that is not medically necessary (as confirmed by a doctor), any days during which you are unable to work will be at your own expense. This means you will not receive sickness benefit for those days. You may choose to use your holiday entitlement instead.

1.3.5 Second Opinion

You may request a second opinion from another occupational physician. The first occupational physician must approve this request and will provide the relevant medical information to the second occupational physician. Requesting a second opinion does not suspend the original medical assessment. This means that you must continue to follow the advice of the first occupational physician until the second occupational physician reaches a different conclusion.

Please note that obtaining a second opinion may take some time because the second occupational physician must first review all relevant medical records.

1.3.6 Expert Opinion (UWV)

If you have concerns about your reintegration process, you may request an Expert Opinion from the UWV. The costs of this assessment are your own responsibility. The UWV only provides an Expert Opinion on the following matters:

- whether you are fit or unfit for work;
- whether suitable work is available within the organisation;
- whether the employee has made sufficient reintegration efforts;
- whether the employer has made sufficient reintegration efforts.

1.3.7 Paid Leave

Sometimes personal circumstances prevent you from working, even though you are not ill. In these situations, you must not report sick, because there is no medical incapacity for work.

Instead, you should take the initiative and discuss your situation with your Recruitment Consultant. (Recruitment Consultants are not allowed to ask about private circumstances unless you choose to discuss them, in accordance with GDPR.) Together you will look for an appropriate solution. Dutch legislation provides for several types of statutory leave, including:

- Parental Leave;
- Emergency Leave;
- Special Leave;
- Short-Term Care Leave;
- Long-Term Care Leave;
- Unpaid Leave;
- Adoption Leave;
- Foster Care Leave.

1.3.8 Actions and Responsibilities During the First and Second Year of Sickness

The employer and employee share responsibility for successful reintegration during the first two years of sickness absence. Arbo.nu Occupational Health Service supports both Goodmorning B.V. and the employee throughout this process.

The Absence Coordinator records:

- all documents relating to the sickness absence process;
- the actual hours worked if the employee is partially unfit for work;
- all reintegration activities undertaken.

This information is stored in the employee's Reintegration File.

1.3.9 Preventive Consultation

Before health problems result in sickness absence, you may consult either the Absence Coordinator or the occupational physician about any concerns relating to your health and work. If you wish to make use of this service, you may contact the Absence Coordinator or Arbo.nu Occupational Health Service directly.

1.3.10 Contact With Arbo.nu After the Second Year of Sickness

If you remain employed after completing two years of sickness absence, contact with Arbo.nu Occupational Health Service normally ends when the waiting period for the WIA assessment has expired. If the UWV imposes a sanction because reintegration opportunities were missed during the 104-week waiting period, contact with Arbo.nu Occupational Health Service will continue for the duration of that sanction.

1.3.11 Termination of Employment

If, after 104 weeks of sickness absence, you are still fully or partially unable to work, your employment may be terminated on the grounds of long-term incapacity for work. If you are fully unfit for work, your employment contract may be terminated completely. If you are partially unfit for work, your employment may be terminated for the part of the work that you are permanently unable to perform.

1.3.12 Additional Information About Reintegration During the 104-Week Sickness Period

If it becomes clear during your sickness absence that you are no longer able to return to your own job due to illness or disability—as confirmed by both the occupational physician and the labour expert—Goodmorning B.V. may start an external reintegration programme (Track 2 / Second Track Reintegration). You are legally required to cooperate with this process.

If it is established that your medical limitations are permanent and that there are no realistic opportunities for suitable work, Goodmorning B.V. may apply for an early WIA assessment through the UWV. Depending on the legal conditions, this application may already be submitted between 13 and 68 weeks after your first day of sickness. You are required by law to cooperate with this assessment.

1.3.13 Consequences of Failing to Comply With the Sickness Absence Regulations (Sanctions)

If you are unable to work due to illness, you are entitled to continued salary payments. Goodmorning B.V. bases this entitlement on the advice of the occupational physician and/or the Absence Coordinator.

The employer is required to impose sanctions if, without a valid reason, you fail to comply with this protocol, including situations such as:

- Not being at home during a scheduled home visit.
- Not being reachable by Arbo.nu Occupational Health Service or Goodmorning B.V.
- Failing to attend an appointment with the occupational physician without a valid reason.
- Reporting sick when you are not actually ill.
- Failing to cooperate with the preparation or revision of the Plan of Action.
- Failing to sign and return the Plan of Action.

Possible disciplinary measures, in chronological order, are:

- Verbal warning (recorded in your personnel file).
- Written warning (recorded in your personnel file).
- Suspension of salary payments.
- Stopping salary payments.
- Suspension from work.
- Dismissal.

1.4 Salary During Sickness

Salary payments during sickness are made in accordance with the conditions that apply at the client where you are scheduled to work. Under Dutch law:

- A maximum of two waiting days may apply for each period of sickness.
- During the first year of sickness, you are entitled to at least 70% of your salary, but never less than the statutory minimum wage.
- During the second year of sickness, you are entitled to 70% of your most recently earned salary.

After Your Employment Ends – Phase B

If your employment ends while you are in Phase B, you are entitled to sickness benefits under the Dutch Sickness Benefits Act (Ziektewet).

The benefit amounts to 70% of the daily wage, calculated in accordance with the Dutch Employee Insurance Daily Wage Decree (Dagloonbesluit Werknemersverzekeringen).

Supplement to Sickness Benefits After Employment Ends – Phase A

If you are unable to work due to illness when your temporary employment agreement in Phase A automatically ends on the agreed end date, Goodmorning B.V. will supplement your statutory sickness benefit, provided that you are entitled to a benefit under the Dutch Sickness Benefits Act.

The supplement is as follows:

- During the first 52 weeks of incapacity for work, your sickness benefit will be supplemented to 90% of the benefit daily wage as determined by the UWV.
- During weeks 53 to 104, your sickness benefit will be supplemented to 80% of the benefit daily wage determined by the UWV.

To receive this supplement, you must submit your UWV benefit specification (pay statement) to Goodmorning B.V. every payment period.

1.5 Privacy Protection

Both Goodmorning B.V. and Arbo.nu Occupational Health Service operate in accordance with the General Data Protection Regulation (GDPR). All employees of Goodmorning B.V. have the right to be treated with care and respect by managers and external organisations, including Arbo.nu Occupational Health Service. Employees also have the right to careful handling of all confidential and personal information. Employees are entitled to access the information contained in their own medical file at any time. The occupational physician of Arbo.nu Occupational Health Service is bound by medical confidentiality.

2. CODE OF CONDUCT

2.1 Introduction

A Code of Conduct describes the standards of behaviour expected within the company. This Code of Conduct explains how we expect our employees to treat colleagues, clients and suppliers. It also sets out the rules regarding the acceptance of gifts, business acquisitions and the publication of information. In addition, this Code of Conduct explains how Goodmorning B.V. treats its employees and what is expected regarding integrity, ethical behaviour and professional conduct.

2.2 Code of Conduct – Guidelines

This Code of Conduct applies to all communication and activities carried out by Goodmorning B.V. and serves as a guideline for everyone working with or for the company. As a temporary employment agency, Goodmorning B.V. is a member of the ABU (General Association of Temporary Employment Agencies) and is required to comply with the standards established by the ABU regarding responsible business conduct.

This Code of Conduct has been created to provide permanent employees, temporary agency workers and clients with clear guidance on what is and is not permitted regarding Discrimination prohibited by law on the grounds of: Sex, Race, Ethnic origin, Skin colour Nationality, Religion, Belief, Political opinion, Marital status, Sexual orientation, Disability Age

2.2.1 General Provisions

2.2.1.1 Compliance with Laws and Regulations

At Goodmorning B.V. we comply with all laws and regulations that apply to our work.

All employees, managers and directors are responsible for ensuring these rules are followed.

Anyone working for Goodmorning B.V. must immediately report any suspected violation through: the Helpdesk; or the correspondence function in the Plan4Flex App.

If you are unsure how to deal with a situation, you must contact your Recruitment Consultant or the Helpdesk immediately. Besides complying with legislation, Goodmorning B.V. attaches great importance to protecting the personal data of employees, clients and suppliers.

We ensure that confidential information is always protected against unauthorized access.

2.2.1.2 Social Responsibility

At Goodmorning B.V. we treat everyone with respect. We always work in accordance with internationally recognised human rights and fundamental human values. We respect all applicable laws and international agreements relating to these rights. Every employee is responsible for following these principles in their daily work. We are also committed to sustainable and environmentally responsible business practices in order to reduce our impact on the environment.

2.2.1.3 Fair Competition

Goodmorning B.V. believes in honest competition. We fully comply with all laws relating to competition, including legislation concerning:

- price fixing;
- cartels;
- market sharing;
- customer allocation.

Any activity that unfairly restricts competition is prohibited. Employees must never exchange confidential commercial information with competitors or third parties regarding:

- prices;
- future prices;
- commercial cooperation;
- customers;
- suppliers;
- acquisitions;
- company takeovers;
- investments or divestments.

If meetings take place where these topics could arise, the appropriate people must be involved, and the Legal Department should be consulted as early as possible.

2.2.1.4 Prevention of Corruption, Money Laundering, Drugs and Stimulants

Within Goodmorning B.V., employees must never obtain personal benefits by accepting payments from business partners or offering payments in return. Giving or receiving gifts or hospitality is only permitted with the approval of your direct manager or another authorised manager. Money or gifts intended for business purposes may never be used outside the approved procedures. Employees must never report for work under the influence of:

- alcohol;
- drugs;
- other intoxicating substances.

The use of alcohol or drugs during working hours is strictly prohibited. Goodmorning B.V. is committed to providing a safe and healthy working environment for everyone. All employees are required to report suspected corruption, money laundering or misuse of drugs or stimulants to their manager or another authorized person. Failure to comply with these rules may result in disciplinary action, including dismissal.

2.2.1.5 Accurate Administration and Record Keeping

All business transactions must be recorded accurately and correctly. Supporting documents must be retained and properly archived. Administrative records must comply with all applicable legislation and tax regulations. Every employee is responsible for following the correct administrative procedures.

Examples include:

- reporting sickness on time;
- requesting annual leave in advance;
- informing Goodmorning B.V. in time if you wish to end your employment.

If you require assistance, you can always contact your Recruitment Consultant or the Helpdesk.

2.2.1.6 Preventing Conscious and Unconscious Discrimination

This Code of Conduct has been developed to ensure that Goodmorning B.V. applies the principle of equal treatment in all employment practices.

The Code aims to:

- put the principle of non-discrimination into practice;
- guarantee equal opportunities for all current and future employees and temporary workers.

2.2.1.7 Enforcement of the Anti-Discrimination Policy

Goodmorning B.V. is responsible for developing and enforcing an effective anti-discrimination policy. Selecting the most suitable candidate based solely on objective criteria helps prevent discrimination. Goodmorning B.V. actively works to prevent the disadvantage of minority groups and will not accept discriminatory behaviour or discriminatory requests from clients. Our goal is to promote equal treatment and equal opportunities for everyone.

2.2.1.8 Communication of the Code of Conduct

Goodmorning B.V. will make this Code of Conduct publicly available. It will be communicated to permanent employees; temporary agency workers; clients.

Regular attention will be given to the contents of this Code of Conduct. Where necessary, additional guidance and instruction will be provided to ensure everyone understands how to apply it in practice.

2.2.1.9 Evaluation of the Code of Conduct

The effectiveness of this Code of Conduct will be evaluated every year.

2.2.2 Prohibition of Discrimination

2.2.2.1 Rejection of Discrimination

In accordance with Dutch equal treatment legislation, including:

- the Equal Treatment Act (AWGB);
- the Equal Treatment of Men and Women Act (WGB);
- the Equal Treatment of Disabled or Chronically Ill People Act (WGBH/CZ);
- the Equal Treatment on the Grounds of Age at Work Act (WGBL);

Goodmorning B.V. rejects all forms of discrimination based on sex; religion; beliefs; political opinion; race; nationality; sexual orientation; marital status; disability; chronic illness; age.

2.2.2.2 Rejecting Discriminatory Requests

The opinions or preferences of clients, their employees or business partners are never a valid reason to exclude individuals. Goodmorning B.V. will clearly inform clients and prospective clients that it will not cooperate with discriminatory requests or requirements.

2.2.3 Recruitment and Selection

2.2.3.1 Equal Opportunities

At Goodmorning B.V., every applicant must have an equal opportunity to be selected for employment. Job advertisements, vacancy texts and images must never suggest that candidates belonging to a particular group have less chance of being selected.

Selection decisions are based solely on objective, job-related criteria.

2.2.3.2 Avoiding Bias Towards Ethnic Minorities

When establishing selection criteria, special care must be taken to avoid prejudice and discrimination. Selection procedures must not contain any direct or indirect discriminatory elements.

2.2.3.3 Psychological Assessments

If an applicant is asked to complete a psychological assessment, possible cultural bias must always be taken into account. The same applies when interpreting the results of these assessments.

2.2.3.4 Recognition of Non-Dutch Diplomas

Diplomas obtained outside the Netherlands will be recognised based on their equivalent Dutch qualification wherever possible.

2.2.3.5 Positive Action in Recruitment

Dutch law allows Goodmorning B.V. to apply a positive action policy for only three groups: women; people belonging to a specific ethnic or cultural minority; people with a disability or chronic illness. This is only permitted where the purpose is to reduce existing inequalities and improve equal opportunities. Goodmorning B.V. may not apply a positive action policy for any other groups, including men; people who do not belong to an ethnic or cultural minority; or based on any other personal characteristic. Any positive action policy must comply with the Dutch Equal Treatment Act and the Equal Treatment of Disabled or Chronically Ill People Act.

When recruiting, selecting and placing temporary agency workers, Goodmorning B.V. is guided solely by objective job-related requirements and applicable legislation.

Clients are informed that Dutch law prohibits Goodmorning B.V. from complying with discriminatory requests. Vacancies are presented in a way that does not express any preference based on age or gender. Where an exception is legally permitted under equal treatment legislation, this will be clearly stated in the vacancy.

During the recruitment process, Goodmorning B.V. will not ask applicants questions about pregnancy; disability; chronic illness; previous medical history; unless this is legally permitted under Dutch equal treatment legislation.

2.2.4 Personnel Management

Discrimination must never influence decisions regarding an employee's performance.

Criteria used for training; courses; education; career development; promotion; internal mobility; must be objective and must not contain direct or indirect discriminatory elements.

2.2.5 Leaving the Organisation

Dismissal or the decision not to extend an employment contract must never be based on skin colour; nationality; ethnic origin. Employment decisions must always be based on legitimate business reasons.

2.2.6 Measures to Prevent Discrimination

Respectful behaviour is expected from everyone working at Goodmorning B.V. Employees must treat one another equally. Everyone should feel welcome, safe and respected within the organisation.

2.2.7 Disciplinary Measures

Discriminatory behaviour that falls within the scope of Dutch anti-discrimination legislation may result in: disciplinary action; and/or a report being made to the police if criminal discrimination laws have been violated.

2.2.8 Respect and Equality

At Goodmorning B.V., every individual is treated with dignity and respect. We strive to create a workplace where discrimination, harassment and intimidation are prevented and where everyone has equal opportunities. The personal dignity, opinions and privacy of all employees are respected. Goodmorning B.V. is committed to providing healthy and safe working conditions. Employees are also free to organise themselves in groups or representative bodies to protect and promote their interests. All employees must treat directors, managers and colleagues with respect.

Discrimination based on race; skin colour; nationality; ethnic origin; gender; religion; sexual orientation; or any other personal characteristic; is strictly prohibited.

Any form of harassment, intimidation or unwanted physical contact is also strictly prohibited.

2.2.9 Avoiding Conflicts of Interest

Employees may not use company property for personal purposes without written permission from their manager. Company property includes confidential information, documents and data. These may only be used for business purposes and must not be removed from company premises without permission. Business decisions must always be made objectively. Personal interests or relationships must never influence business decisions. If a conflict of interest could arise, the employee must immediately inform their manager. Employees must also report if they intend to enter into a business transaction on behalf of Goodmorning B.V. with a company in which: their partner; or a close family member owns more than 5% of the shares or voting rights.

2.2.10 Protection of Company Assets

Every employee is responsible for protecting the property of Goodmorning B.V. against loss; theft; damage; misuse. This also includes intangible assets such as confidential documents; digital information; business knowledge; intellectual property.

Confidential information used at company premises; company vehicles; home workplaces; must never become accessible to unauthorized people. Employees are expected to take all appropriate security measures to protect company information.

2.2.11 Representing the Company and Public Communication

Every employee represents Goodmorning B.V. in the eyes of the public. Confidential information relating to company strategy; mergers; acquisitions; restructuring; other sensitive business matters; must never be shared with the media or through electronic communication without prior approval. Any public statement—whether spoken or written—may only be made after consultation with your manager.

3. CONFIDENTIAL ADVISER

3.1 Introduction

A safe working environment is essential for performing work with integrity. Employees should feel free to speak openly about behaviour that does not reflect the values and standards of Goodmorning B.V. The Confidential Adviser plays an important role in maintaining integrity in the workplace. Employees may sometimes find it difficult to discuss certain issues with their manager or the management team. By appointing a Confidential Adviser, employees have the opportunity to discuss:

- integrity issues;
- breaches of integrity;
- inappropriate behaviour;
- sexual harassment;
- other workplace concerns.

The Confidential Adviser provides support, advice and guidance regarding possible next steps. Employees can also make a formal report, which can be treated confidentially if requested. All matters are handled with the utmost confidentiality. No action will be taken without the employee's consent.

Goodmorning B.V. works with Vangnet, an external confidential adviser service. Two Confidential Advisers have been appointed, allowing employees to choose the person they feel most comfortable contacting. They can be reached by email: vertrouwenscommissie@goodmorning.eu

The Confidential Adviser acts as an independent point of contact for employees and offers: a listening ear; confidential advice; guidance; support in resolving workplace issues. The Confidential Adviser can also advise whether: a formal complaint should be submitted; or an informal conversation with the person involved may be sufficient to resolve the issue.

Sometimes a person experiencing inappropriate behaviour may find it difficult to approach the person responsible. In such situations, the Confidential Adviser can act as a mediator and facilitate a conversation between both parties. If mediation does not resolve the issue, the employee may be referred to the Complaints Committee. The employee always remains in control of the process. The Confidential Adviser supports the employee but does not take over responsibility. If mediation by the Confidential Adviser does not provide a solution, professional mediation may be considered before referring the matter to the Complaints Committee.

3.2 Complaints Committee

Under the Dutch Working Conditions Act (Arbowet), employers are required to implement a policy aimed at preventing or reducing Psychosocial Workload (PSA).

This includes preventing unwanted behaviour; sexual harassment; aggression; violence; bullying; discrimination. The Confidential Adviser plays an important role in implementing this policy.

If the inappropriate behaviour continues, the employee may choose to follow the formal complaints procedure. In that case, the complaint will be investigated by an independent and impartial Complaints Committee appointed by the employer.

The Complaints Committee consists of at least three members.

Committee members may be selected from within the Labour Power Company (LPC) group.

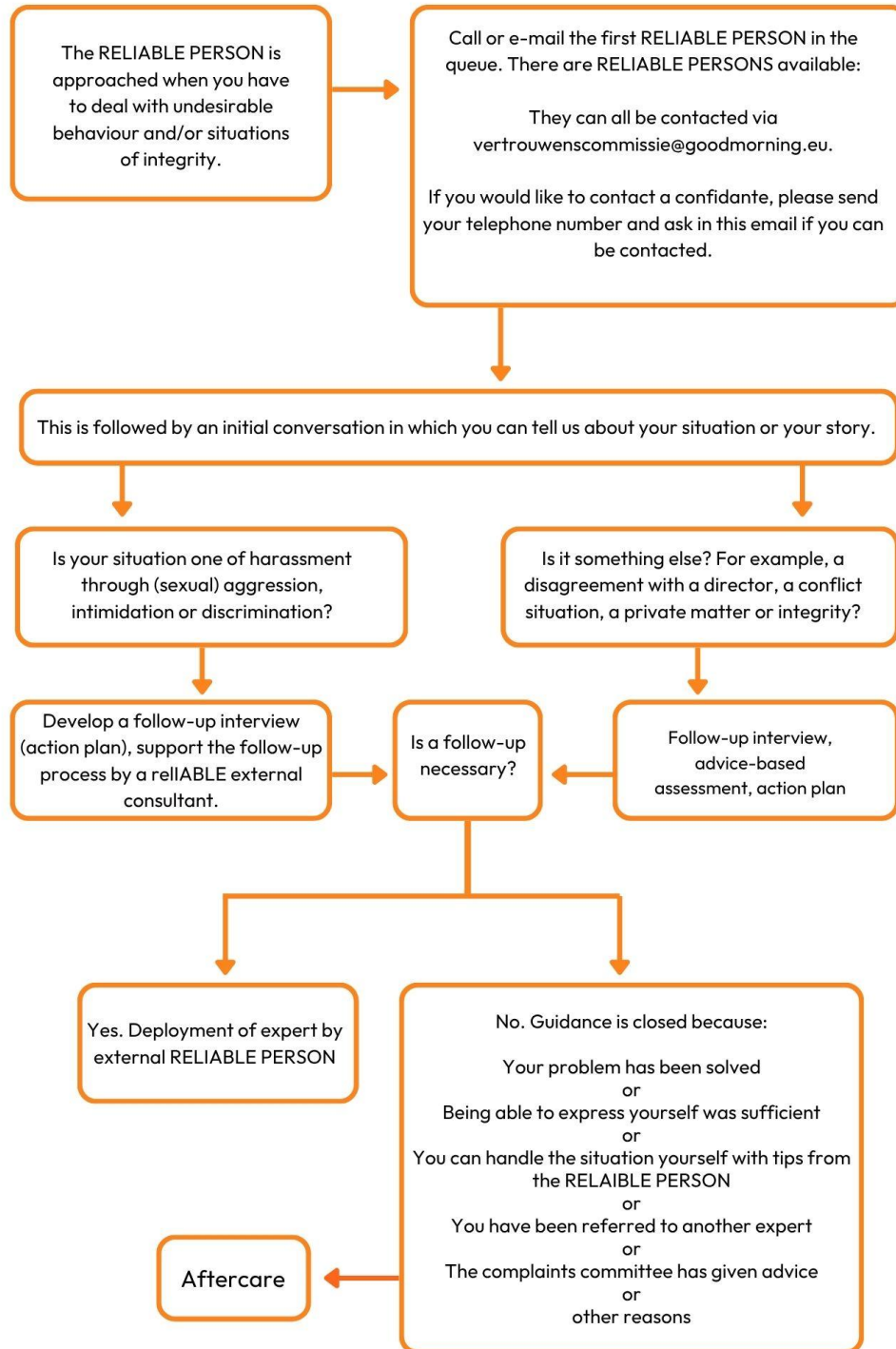
Typically:

- one member comes from the employee's own company;
- two members come from other LPC companies.

At least two members investigate the complaint and advise the employer on any measures that should be taken. Throughout the entire process, the Confidential Adviser may continue to support the employee if requested.

3.3 Procedure – Confidential Adviser

The procedure for contacting the Confidential Adviser is shown in the accompanying flowchart and step-by-step overview.



4. WHISTLEBLOWING POLICY

4.1 Introduction

Appropriate behaviour—behaviour that reflects the values and standards of Goodmorning B.V.—is essential for the wellbeing of employees and society. This includes not only the way people treat each other, but also the way they act towards the organisation and the wider community. A respectful and ethical working environment contributes to employee wellbeing; job satisfaction; engagement; productivity; responsible business practices.

Goodmorning B.V. expects all employees to maintain the highest standards of integrity. If an employee suspects serious misconduct involving the public interest, they may submit a report under the Dutch Whistleblowers Protection Act. The Dutch Whistleblowers Authority (Huis voor Klokkenluiders) provides advice; carries out investigations; supports organisations in maintaining integrity protects whistleblowers. More information can be found at: www.wetbeschermingklokkenluiders.nl

A report concerning the public interest may include suspected breaches of legislation; risks to public health; risks to public safety; environmental damage; serious failures in the functioning of an organisation due to improper conduct. The suspicion must always be based on reasonable grounds.

Examples include:

- theft; embezzlement; fraud; deception;
- unauthorised secondary employment;
- corruption; bribery; accepting or requesting gifts;
- misuse or concealment of information;
- forgery;
- misuse of company property.

Employees who are unsure whether to make a report may first speak confidentially with the Confidential Adviser.

4.2 Whistleblowing Procedure

If there is a suspected legal violation; breach of internal company rules; threat to public health; threat to public safety; environmental damage; serious misconduct; breach of EU law; a report may be submitted.

Reports may be made by current employees; former employees; workers from another organisation who became aware of the issue while working with Goodmorning B.V.

4.2.1 Information, Advice and Support

- 1) Employees may confidentially ask the Confidential Adviser for information; advice; support; regarding a suspected irregularity, wrongdoing or breach of EU law.
- 2) Employees may also contact the Dutch Whistleblowers Authority for confidential advice and support.

4.2.2 Internal Reporting by an Employee

- 3) An employee who suspects wrongdoing within Goodmorning B.V. may report this to any manager with a higher hierarchical position. If the employee reasonably believes that senior management is involved, the report may instead be submitted directly to the Complaints Committee.
- 4) The employee may also report through the Confidential Adviser. With the employee's permission, the Confidential Adviser will forward the report to the appropriate manager or the Complaints Committee.
- 5) Reports may be made in writing; by telephone; through voice messaging systems; during a face-to-face meeting requested by the employee. Anonymous reports are also permitted.

4.2.3 Reports by Workers from Another Organisation

- 6) A person employed by another organisation who becomes aware of suspected wrongdoing within Goodmorning B.V. during their work may also submit a report to the Complaints Committee.
- 7) These reporters are entitled to the same protection as Goodmorning employees. They may also seek support from the Confidential Adviser.

4.2.4 Reporting to a Competent Authority

- 8) Instead of reporting internally, a whistleblower may choose to report directly to the appropriate competent authority.

4.2.5 Protection of the Whistleblower

- 9) The employer shall protect the whistleblower against retaliation.
- 10) A whistleblower shall also not suffer retaliation during or after the public disclosure of a suspicion, provided that the whistleblower has reasonable grounds to believe that: the wrongdoing poses an imminent or actual danger to the public interest; or there is a risk of retaliation if the report is made to a competent authority or another competent body; or it is unlikely that the wrongdoing will be effectively addressed.
- 11) A whistleblower shall also not suffer retaliation during or after the public disclosure of a suspected irregularity, wrongdoing or breach of EU law, provided that:

- The whistleblower has reasonable grounds to believe that, at the time of the public disclosure, the reported information concerning the suspected irregularity, wrongdoing or breach was accurate;
 - Before making the public disclosure, the whistleblower submitted a report to the employer; a competent authority; an administrative authority; and/or another competent body;
 - Based on the available information, the whistleblower has reasonable grounds to believe that insufficient progress has been made in investigating or addressing the reported matter.
- 12) For the purposes of Section 4.2.5, retaliation includes, but is not limited to, any detrimental measure such as:
- Dismissal or suspension;
 - A financial penalty as referred to in Article 650 of Book 7 of the Dutch Civil Code;
 - Demotion;
 - Refusal of promotion;
 - A negative performance assessment;
 - A written warning or reprimand;
 - Transfer to another branch or location;
 - Discrimination;
 - Intimidation, bullying or exclusion;
 - Defamation or slander;
 - Early termination of an agreement for the supply of goods or services; and
 - Withdrawal of a license or permit.
- 13) Retaliation shall also be deemed to exist where there are reasonable grounds for addressing the whistleblower's performance or for taking a detrimental measure as referred to in Section 4.2.5, but where the measure taken by the employer is not proportionate to those grounds.
- 14) Where a whistleblower suffers retaliation during or after the handling of a report, or following the public disclosure of a suspicion, it shall be presumed that the retaliation is a consequence of the report or the public disclosure. The employer must demonstrate that the retaliation was not a result of the report or the public disclosure.
- 15) The employer shall ensure that managers and colleagues of the whistleblower refrain from any form of retaliation in response to a report made properly and in good faith, where such retaliation could hinder the whistleblower's professional or personal functioning. This includes, but is not limited to:
- Bullying, ignoring or excluding the whistleblower;
 - Making unfounded or disproportionate allegations regarding the whistleblower's performance;

- Imposing, in any form, restrictions on the whistleblower or the whistleblower's colleagues, including investigation restrictions, communication restrictions, workplace restrictions and/or contact prohibitions;
 - Intimidating the whistleblower by threatening specific measures or actions if they continue with their report.
- 16) The employer shall address any employee who engages in retaliation against a whistleblower and may impose a warning or any other appropriate disciplinary measure.

4.2.6 Preventing Retaliation Against the Whistleblower

- 17) As soon as possible after receiving a report, the Complaints Committee will appoint a Contact Person, in consultation with the whistleblower. The Contact Person will discuss any risks of retaliation with the whistleblower; identify measures to reduce these risks; explain what the whistleblower can do if retaliation occurs.

A written record of these discussions will be prepared and submitted to the whistleblower for approval and signature. The whistleblower will receive a copy of this document.

- 18) If the whistleblower believes that retaliation has taken place, they should immediately inform the Contact Person. Together they will discuss possible measures to prevent or stop the retaliation. A written report of this discussion will again be prepared, signed and forwarded to the HR Adviser.
- 19) The HR Adviser is responsible for ensuring that appropriate protective measures are implemented.

4.2.7 Protection of Other Persons Involved

- 20) The employer shall not subject the Confidential Adviser, the Contact Person, any third parties involved, advisers or investigators employed by the employer to retaliation as a result of carrying out the duties described in this policy.
- 21) The employer shall not subject an employee who is interviewed by the investigators to retaliation because they have provided a statement in good faith.
- 22) The employer shall not subject an employee to retaliation because they have provided the investigators with documents which, in their reasonable opinion, are relevant to the investigation.

4.2.8 Confidential Handling of the Report and the Identity of the Whistleblower and Other Persons Involved

- 23) All persons involved in handling a report shall not disclose the identity of the whistleblower or any other persons involved without the whistleblower's explicit written consent and shall treat all information relating to the report as confidential.

- 24) If the suspected wrongdoing has been reported through the Confidential Adviser and the whistleblower has not given permission for their identity to be disclosed, all correspondence relating to the report shall be sent to the Confidential Adviser, who shall forward it to the whistleblower without delay.
- 25) All persons involved in handling a report shall not disclose the identity of the persons involved, the whistleblower or any adviser without the explicit written consent of the whistleblower and the adviser.

4.2.9 Recording, Forwarding and Acknowledgement of Receipt of an Internal Report

- 26) If an employee reports a suspicion verbally to a manager, or provides a written report following a verbal explanation, the manager shall, in consultation with the whistleblower, prepare a written record of the report and submit this record to the whistleblower for approval and signature. The whistleblower shall receive a copy of this record.
- 27) If an employee reports a suspicion verbally through the Confidential Adviser, or provides a written report following a verbal explanation, the Confidential Adviser shall, in consultation with the whistleblower, prepare a written record of the report and submit this record to the whistleblower for approval and signature. The whistleblower shall receive a copy of this record.
- 28) The manager to whom the report has been made shall forward the report without delay to the HR Adviser within the employer's organisation.
- 29) If the whistleblower or the manager to whom the report has been made has reasonable grounds to suspect that the HR Adviser is involved in the suspected wrongdoing or irregularity, the manager shall immediately forward the report to the Complaints Committee.
- 30) The HR Adviser shall send the whistleblower an acknowledgement of receipt without delay and no later than seven days after receiving the report. The acknowledgement shall include, at a minimum: a description of the report; the date on which it was received; and a copy of the report. The HR Adviser shall provide the whistleblower with information regarding the follow-up actions no later than three months after the acknowledgement of receipt.
- 31) Upon receipt, the employer shall register the report in a register established for that purpose. Data relating to the report shall be destroyed when it is no longer necessary to retain it in order to comply with the requirements of the Dutch Whistleblowers Protection Act.

4.2.10 Handling of the Internal Report by the Employer

- 32) The HR Adviser shall initiate an investigation into the reported suspicion unless:
 - the suspicion is not based on reasonable grounds; or

- it is evident from the outset that the report does not relate to a suspected wrongdoing, breach of EU law or irregularity.
- 33) If the HR Adviser decides not to initiate an investigation, they shall inform the whistleblower in writing within two weeks of the internal report. The notification shall state the reasons why the HR Adviser considers that: the suspicion is not based on reasonable grounds; or it is evident that the report does not concern a suspected wrongdoing, irregularity or breach.
- 34) The HR Adviser shall assess whether a competent authority should be informed of the internal report concerning suspected wrongdoing. Reports shall only be forwarded to other authorities with the whistleblower's explicit consent. If the employer informs a competent authority, the HR Adviser shall send the whistleblower a copy of that notification unless there are compelling reasons not to do so.
- 35) The HR Adviser shall assign the investigation to the Complaints Committee, which shall act independently and impartially. Under no circumstances shall the investigation be carried out by persons who are or may have been involved in the suspected wrongdoing or irregularity.
- 36) The HR Adviser shall inform the whistleblower in writing without delay that an investigation has been initiated, by whom the investigation will be carried out, and shall provide the whistleblower with a copy of the investigation assignment unless there are compelling reasons not to do so.
- 37) The HR Adviser shall inform the persons to whom the report relates about the report and about the notification made to a competent authority, unless doing so could prejudice the investigation or enforcement process.

4.2.11 Conduct of the Investigation

- 38) The investigators shall give the whistleblower the opportunity to be heard. They shall prepare a written record of the interview and submit it to the whistleblower for approval and signature. The whistleblower shall receive a copy of this record.
- 39) The investigators may also hear other persons. They shall prepare a written record of each interview and submit it to the person interviewed for approval and signature. The person interviewed shall receive a copy of the record.
- 40) The investigators may inspect and request any documents within the employer's organisation that they reasonably consider necessary for the investigation.
- 41) Employees may provide the investigators with any documents that they reasonably believe are relevant to the investigation.
- 42) The investigators shall prepare a draft investigation report and give the whistleblower the opportunity to comment on it, unless there are compelling reasons not to do so.

- 43) The investigators shall then finalise the investigation report and provide the whistleblower with a copy unless there are compelling reasons not to do so.
- 44) Any trade secrets obtained in connection with the report may not be used for any purpose other than the follow-up of the report.

4.2.12 Employer's Position

- 45) Within eight weeks of the report, the HR Adviser shall inform the whistleblower in writing of the employer's substantive position regarding the reported suspicion. The notification shall also state the actions that have been taken as a result of the report.
- 46) If it becomes clear that the employer's position cannot be provided within the prescribed period, the HR Adviser shall inform the whistleblower in writing. The notification shall specify the period within which the whistleblower can expect to receive the employer's position. If this extends the total period beyond twelve weeks, the notification shall also explain why a longer period is necessary.
- 47) After completion of the investigation, the HR Adviser shall assess whether an external authority should be informed of the internal report concerning the suspected wrongdoing or breach, as well as of the investigation report and the employer's position. If the employer informs an external authority, the whistleblower shall receive a copy unless there are compelling reasons not to do so.
- 48) The persons to whom the report relates shall be informed in a corresponding manner to the whistleblower, unless doing so could prejudice the investigation or enforcement process.

4.2.13 Right to be Heard Regarding the Investigation Report and the Employer's Position

- 49) The employer shall give the whistleblower the opportunity to respond to the investigation report and to the employer's position.
- 50) If the whistleblower demonstrates, with supporting reasons, that the reported suspicion has not been investigated, has not been investigated properly, or that the investigation report or the employer's position contains significant inaccuracies, the employer shall respond substantively and, where necessary, initiate a new or supplementary investigation.
- 51) If the employer informs, or has informed, an external authority, the employer shall also forward the whistleblower's response to the investigation report and the employer's position to that authority. The whistleblower shall receive a copy.

4.2.14 Internal and External Investigation into Retaliation Against the Whistleblower

- 52) The whistleblower, or any of the persons referred to in Article 4 of this policy who believes that they have suffered retaliation as a result of reporting a suspected

irregularity, wrongdoing or breach of EU law, may request the HR Adviser to investigate how they have been treated within the employer's organisation.

- 53) The whistleblower may also request the Investigation Department of the Dutch Whistleblowers Authority (Huis voor Klokkenuiders) to investigate the manner in which the employer has treated the whistleblower following the report of a suspected irregularity, wrongdoing or breach of EU law.

4.2.15 Publication, Reporting and Evaluation

- 54) The HR Adviser shall ensure that this policy is published on the employer's intranet and made publicly available on the employer's website.
- 55) Each year, the HR Adviser shall prepare a report on the policy regarding the reporting of suspected wrongdoing and on the implementation of this policy. The report shall include at least:
- information on the policy implemented during the previous year;
 - information on the number of reports received, an indication of the nature of those reports, the outcomes of the investigations and the employer's positions;
 - general information on experiences relating to the prevention of retaliation against whistleblowers and the number of requests for investigations into alleged retaliation following a report.
- 56) The HR Adviser shall submit the draft report for discussion at a meeting of the Works Council / Employee Representative Body.
- 57) The HR Adviser shall give the Works Council / Employee Representative Body the opportunity to express its views on the policy.

4.2.16 Entry into Force

- 58) This policy entered into force on 1 January 2024.
- 59) This Whistleblowing Policy is available for inspection on the website of Goodmorning B.V.
- 60) This policy may be cited as the Policy on Reporting Suspected Irregularities, Wrongdoing or Breaches of EU Law.

5. INAPPROPRIATE BEHAVIOUR

5.1 Introduction

Inappropriate behaviour includes any conduct that is perceived by an individual or a group as threatening, humiliating or intimidating, and against which the person or persons concerned are unable, or insufficiently able, to defend themselves. It may also involve offensive behaviour that undermines the safety of employees in the workplace. This includes, but is not limited to, sexual harassment, aggression and violence, bullying, and discrimination.

Various forms of inappropriate behaviour may occur in the workplace. Such behaviour may originate internally, but also externally, for example from clients. The Dutch Working Conditions Act (Arbowet) identifies four main categories: sexual harassment, aggression and violence, bullying, and discrimination. It is for the employee receiving the attention or behaviour to determine whether it is welcome or unwelcome.

Sexual harassment may take many forms, including unwanted sexual advances, requests for sexual favours, or other verbal, non-verbal or physical conduct of a sexual nature that is experienced as unwelcome. Examples include sexually explicit remarks, jokes or innuendo, displaying sexually explicit or pornographic images, staring, sexually suggestive gestures, and unwanted physical contact such as putting an arm around someone's shoulder, grabbing, pinching, kissing, indecent assault or rape.

Aggression and violence include behaviour such as swearing, verbal abuse, physical violence, threats, intimidation or putting someone under pressure.

Bullying is repeated negative behaviour against which a person is unable to defend themselves. Examples include making belittling or humiliating remarks, persistent criticism, physical assaults, threats of violence, isolating, excluding or ignoring someone, gossiping, spreading malicious rumours, lies and false accusations.

Discrimination occurs when people are treated unequally, disadvantaged or excluded on the basis of personal characteristics. Examples of protected characteristics include race, nationality, sex, sexual orientation, religion or belief, disability and age.

5.2 Procedure – Inappropriate Behaviour

Goodmorning B.V. has established a procedure to be followed if, despite the preventive measures in place, incidents involving inappropriate behaviour occur. Both an internal and an external Confidential Adviser have been appointed, and an independent Complaints Committee has been established to investigate formal complaints. The Complaints Committee hears the persons directly involved and any witnesses (right to be heard and right

of reply) and advises the management and the Board of Directors on whether the complaint is well-founded. The procedure distinguishes between an informal and a formal route. In both cases, the employee may seek support from a Confidential Adviser. The employee is free to decide which route they wish to follow.

5.2.1 Informal Procedure

The informal procedure focuses on resolving the issue without taking formal steps. The employee reports the complaint through the Helpdesk using the correspondence function in the Plan4Flex App. The Personnel Administration Department will register the complaint and forward it to the appropriate Recruitment Consultant (work-related matters) or Coordinator (housing-related matters). The Recruitment Consultant or Coordinator will meet with both the complainant and the person whose behaviour is being complained about in order to discuss the issue and establish acceptable boundaries. The Confidential Adviser or Personnel Administration Department may provide support during this process. If the employee's manager is the person whose behaviour is being complained about, the Board of Directors may become involved where appropriate. The purpose of the informal procedure is not primarily to establish the facts, but rather to discuss what the complainant considers to be inappropriate behaviour and to encourage both parties to communicate and respect personal boundaries.

5.2.2 Formal Procedure

In some situations, the informal procedure is not appropriate or does not result in a satisfactory solution. In such cases, the complainant may choose to follow the formal procedure or consider mediation. Following a discussion with the Confidential Adviser, the complainant may decide whether to submit a formal complaint and initiate the formal procedure. The complainant may then submit a formal complaint to the Complaints Committee.

5.2.3 Complaints Procedure for Inappropriate Behaviour (Formal Complaint)

5.2.3.1 Purpose of the Procedure

The purpose of this procedure is to provide employees with the opportunity to submit a professional and independent complaint regarding ongoing inappropriate behaviour experienced in the workplace. Its objective is to enable the employer to take appropriate and well-founded measures to stop the inappropriate behaviour.

The procedure is also intended to ensure that the person against whom the complaint has been made is treated fairly and carefully, allowing an independent and objective assessment to be made while preventing unfounded accusations.

5.2.3.2 Protection

A formal complaint shall be treated confidentially. Although it is not possible to remain anonymous when submitting a formal complaint, the Confidential Adviser, together with the Complaints Committee, shall ensure that the complainant does not suffer any adverse consequences as a result of submitting the complaint. The respondent shall also be treated fairly and with due care. The employer shall ensure that the complainant is not disadvantaged in their position within the organisation as a result of making use of the complaints procedure.

5.2.3.3 Confidentiality

The complainant, the respondent, the Confidential Adviser, the members of the Complaints Committee, and any other persons involved in handling the complaint shall treat all information relating to the complaint as strictly confidential. They shall ensure that the privacy of both the complainant and the respondent is safeguarded at all times.

5.2.3.4 Withdrawal from the Procedure

If a member of the Complaints Committee is personally involved in the complaint, or considers themselves to be personally involved, they shall not take part in handling the complaint.

In such cases, another Complaints Committee shall be appointed to ensure that the complaint is dealt with impartially and correctly.

5.2.3.5 Criminal Proceedings

If the Complaints Committee is of the opinion that a criminal offence, as referred to in the Dutch Criminal Code (Wetboek van Strafrecht), may have been committed, this shall be recorded in the investigation report. It is the responsibility of the complainant to report the matter to the police. In specific circumstances, the employer reserves the right to file a police report. This complaints procedure does not affect the right of the complainant to initiate legal proceedings.

5.2.4 Procedure – Formal Complaints Procedure

1) Submitting a Complaint

A complaint may be submitted using the complaint form available on the website.

The complaint must be submitted in writing to the Complaints Committee. The complaint shall be registered in the complaints register and handled by the Complaints Committee. The Confidential Adviser may assist the complainant in preparing the written complaint.

The complaint must contain at least the following information:

- A description of the inappropriate behaviour.
- The name, address, position and relationship of the complainant to the respondent.
- The name, department and position of the respondent.
- The date, time, period and frequency of the inappropriate behaviour.
- The location where the inappropriate behaviour took place.

- Any documents or other material supporting the complaint.
- Anonymous complaints cannot be processed, as the Complaints Committee is required to apply the principles of hearing both parties (right to be heard and right of reply).

2) Determining Admissibility

Within two weeks of receiving the complaint, the Complaints Committee shall inform both the complainant and the respondent in writing whether the complaint is admissible and will be investigated. If the complaint is declared admissible, the Complaints Committee shall send the respondent a copy of the complaint; and a copy of the complaints procedure. The complainant has the right to withdraw the complaint at any time until the Complaints Committee has submitted its advice to the Board of Directors. Withdrawal must be made by written notice to the Complaints Committee. In matters not covered by this procedure, the Complaints Committee shall decide after consultation with the Board of Directors of Goodmorning B.V.

3) Investigation

If the complaint is declared admissible, the Complaints Committee shall conduct an investigation. For this purpose, the Committee may obtain any information it reasonably considers necessary. to receive from the employer all information required for the investigation. The Committee may hear witnesses and consult experts, either on its own initiative or at the request of the complainant and/or the respondent. Both parties shall be heard, after which the Complaints Committee shall reach an independent and objective conclusion. All hearings shall take place in private. Both the complainant and the respondent may be accompanied during the hearing by a support person, such as a Confidential Adviser and/or an adviser.

4) Written Record

A written record shall be prepared of every hearing. A copy of the record shall be sent to both the complainant and the respondent within seven working days after the hearing.

5) Advice

Within six weeks of receiving the complaint, the Complaints Committee shall prepare a written investigation report, including its advice to the Board of Directors of Goodmorning B.V. If the report cannot be completed within this period, the Complaints Committee shall inform both the complainant and the respondent, stating the reason for the delay. The reporting period may be extended by a maximum of one month.

The investigation report shall include an assessment of whether the complaint is well-founded; and advice to the employer's Board of Directors regarding any measures to be taken. A copy of the report shall be sent to: the complainant; the respondent; and where applicable, the Confidential Adviser and/or adviser.

6) Decision

Within four weeks of receiving the advice of the Complaints Committee, the Board of Directors of Goodmorning B.V. shall issue a reasoned decision in writing. This decision shall be sent as soon as possible to the complainant; the respondent; the Complaints Committee; and the Confidential Adviser and/or adviser.

5.2.5 Procedure – Complaints Concerning Abuse of Power

5.2.5.1 Role of the Complaints Committee

- 1) The Complaints Committee is responsible for investigating complaints concerning abuse of power.
- 2) The Complaints Committee has been established for the benefit of all employees within our organisation.
- 3) The Complaints Committee advises the Board of Directors on possible measures that may be taken in response to a complaint concerning abuse of power.
- 4) The Committee also advises the Board of Directors on improvements to the organisation's preventive policy relating to abuse of power.

The Complaints Committee deals with complaints relating to abuse of power. The complaints handled by the Committee are of great importance to everyone involved and may have a significant impact. It is therefore essential that these complaints are treated seriously and that the advice provided to the Board of Directors is also taken seriously. In other words, the Board of Directors must clearly explain how it deals with the Committee's recommendations. This is not only important in order to do justice to those reporting possible misconduct, but also to prevent similar situations from occurring elsewhere within the organisation.

5.2.5.2 Members of the Complaints Committee

- 1) The Complaints Committee shall consist of at least three members from the Labour Power Company (LPC) Group, one of whom shall be appointed as Quality Manager.
- 2) All Committee members must have a thorough understanding of issues relating to abuse of power and must be able to demonstrate their involvement in this subject.
- 3) The Complaints Committee aims to have a diverse composition, including both men and women.
- 4) The Quality Manager is responsible for receiving and processing complaints and all other correspondence addressed to the Complaints Committee, as well as preparing recommendations and other outgoing correspondence on behalf of the Committee.

- 5) It is essential that the Complaints Committee acts as a neutral and impartial body towards both the complainant and the respondent.

5.2.5.3 Procedure for Complaints Concerning Abuse of Power

When the Complaints Committee receives a written complaint concerning abuse of power from the Confidential Adviser, the Quality Manager shall convene the members of the Committee within 14 days. The role of the Confidential Adviser is essential within this procedure. Without a referral from the Confidential Adviser, the Complaints Committee will not become involved. This means that employees cannot approach the Committee directly.

Although this may initially appear to create a higher threshold, the opposite is true. The Confidential Adviser acts as an accessible first point of contact, as employees are generally more likely to approach one trusted person than an entire committee. Furthermore, the Confidential Adviser is not obliged to initiate formal proceedings following every report. Together with the employee, they decide whether the complaint should be referred to the Complaints Committee.

- 1) The Complaints Committee shall interview the employee who submitted the complaint. If requested, the Confidential Adviser may attend this meeting.
- 2) The Complaints Committee shall interview the respondent against whom the complaint has been made. If the respondent wishes, they may invite their own Confidential Adviser or another adviser of their choice to attend the meeting.
- 3) After the interviews have taken place, the Complaints Committee shall prepare an official report as soon as possible. The persons involved shall sign the report to confirm that they have read it and agree with the record of their own statements.
- 4) Signing the official report forms an essential part of the procedure. It prevents disputes afterwards about how the complainant and the respondent experienced the incident. It also confirms that both parties have been given an adequate opportunity to present their views.
- 5) As each party signs only for the accuracy of their own statement, the procedure does not determine who is right. The decision on whether the complaint is well-founded rests solely with the Complaints Committee.
- 6) Where necessary, the Complaints Committee may consult experts for advice on relevant matters. If the Complaints Committee considers the complaint to be well-founded, it shall provide the Board of Directors of Goodmorning B.V. with written advice regarding the measures that may be taken. If the Board of Directors decides not to follow this advice, it must explain its reasons to the Complaints Committee. The Complaints Committee shall send a copy of its advice to all parties involved.
- 7) If the Complaints Committee concludes that the complaint is unfounded, it shall inform the parties involved in writing, stating the reasons for its decision.

8) The entire complaints procedure shall not exceed three months.

5.2.5.4 Confidentiality

- 1) Members of the Complaints Committee are bound by strict confidentiality regarding all information they obtain or advise on in their capacity as members of the Committee.
- 2) Without the prior consent of the persons concerned, Committee members shall not provide third parties with copies of reports, recommendations or any other documents relating to a complaint.

6. PSYCHOSOCIAL WORKLOAD (PSA) POLICY

6.1 Introduction

This Psychosocial Workload (PSA) Policy Statement is intended to protect employees against psychosocial workload and to comply with the applicable legal obligations in this area.

We recognise our responsibility to provide a working environment that is free from discrimination, harassment, bullying, aggression and violence. We have therefore established this policy in order to fulfil that responsibility.

6.2 Procedure – Psychosocial Workload (PSA) Policy

1. Definition

Psychosocial Workload (PSA) means the workload experienced by employees as a result of inappropriate behaviour in the workplace, including discrimination, harassment, bullying, aggression and violence.

2. Responsibilities

The Board of Directors is responsible for implementing and enforcing this policy.

Managers are responsible for creating and maintaining a safe and healthy working environment and for taking appropriate measures to prevent and address psychosocial workload (PSA). Employees are expected to be aware of their own behaviour, to treat their colleagues with respect, and to refrain from any form of inappropriate behaviour.

3. Prevention

The Board of Directors shall ensure that a safe working environment is provided in which employees feel supported and encouraged to report incidents relating to psychosocial workload (PSA). Employees may report such incidents to their Recruitment Consultant.

Employees may also contact the Confidential Adviser for support and guidance.

4. Measures

In the event of incidents relating to psychosocial workload (PSA), the Complaints Procedure described in Section 5.2.4 of this policy may be followed. Where necessary, the employer shall take appropriate measures.

5. Sanctions

In the event of a breach of the provisions of this policy, the employer shall have the right, depending on the seriousness of the breach, to impose disciplinary measures in accordance with Section 10 – Disciplinary Measures, pursuant to Article 7:629 of the Dutch Civil Code.

7. ADM POLICY: ALCOHOL, DRUGS AND MEDICATION

7.1 Introduction

An important aspect of providing a safe and healthy working environment is preventing risky behaviour, such as the use of alcohol, drugs and medication during working hours or reporting for work while under the influence. This policy sets out the rules regarding the use of alcohol, drugs and medication in the workplace, as well as the prevention of substance abuse and addiction. By implementing this policy, we work together to ensure a safe and healthy working environment for all employees.

7.2 Procedure – Alcohol, Drugs and Medication (ADM) Policy

This policy sets out the rules regarding the use of alcohol, drugs and medication in the workplace.

1. Alcohol, Drugs and Medication

It is prohibited to consume alcohol during working hours or to be under the influence of alcohol or other intoxicating substances while at work. It is also prohibited to possess alcohol or drugs in the workplace. The use of medication that may affect alertness or awareness is permitted only if it has been prescribed by a qualified medical practitioner. Employees who are using medication that may affect their alertness or awareness must immediately inform their manager. This is necessary to ensure safety in the workplace and to maintain the quality of work.

2. Exceptions to the Prohibition

The general prohibition on alcohol may only be waived with the employer's explicit permission during special occasions. The use of drugs, or being under the influence of drugs while at work, is strictly prohibited at all times. No exceptions or permission can be granted for this.

Where permission has been given to make an exception to the alcohol prohibition, employees are expected to act responsibly when consuming or offering alcohol. Being intoxicated is strictly prohibited.

3. Use of Company Property and Equipment

Operating a vehicle while under the influence of drugs, alcohol or medication that affects alertness or awareness during working hours is strictly prohibited.

Operating a vehicle provided by the employer while under the influence of drugs, alcohol or medication that affects alertness or awareness is strictly prohibited, both during and outside working hours. This includes but is not limited to a company car; a leased vehicle; a company van; or a company bicycle. The use of company property or equipment while under the influence of alcohol or drugs is strictly prohibited. This prohibition applies not only to the examples listed above, but also to any comparable company property or equipment.

The use of company property or equipment after taking medication that may affect alertness or awareness is only permitted with the employer's explicit approval.

4. Sanctions

In the event of a breach of the provisions of this policy, the employer shall have the right, depending on the seriousness of the breach, to impose disciplinary measures in accordance with Section 10 – Disciplinary Measures, pursuant to Article 7:629 of the Dutch Civil Code.

8. DISCIPLINARY MEASURES POLICY

8.1 General

- 1) Goodmorning B.V. may impose a disciplinary measure on an employee who:
 - a. acts in breach of the employment contract and/or the rules applicable within the organisation, including but not limited to those laid down in the employment contract, the Employee Handbook and the Code of Conduct;
 - b. acts in breach of the law;
 - c. commits a criminal offence.
- 2) When imposing a disciplinary measure, including determining its severity, Goodmorning B.V. shall take into account the nature and seriousness of the breach.
- 3) Before imposing a disciplinary measure, Goodmorning B.V. shall conduct a proper investigation. This shall, where possible, include giving the employee the opportunity to be heard and to respond to the allegations (right to be heard and right of reply).
- 4) In addition to the disciplinary measures available under Dutch law, Goodmorning B.V. may impose one or more of the following disciplinary measures:
 - a. A written warning;
 - b. Deduction of annual leave entitlement;
 - c. Withholding or reducing a bonus;

- d. Refusal of a salary increase or promotion;
- e. Demotion;
- f. Transfer to another position or location;
- g. Suspension or temporary removal from duties;
- h. Summary dismissal (dismissal with immediate effect).

8.2 Written Warning

- 1) Goodmorning B.V. shall issue a written warning where a breach is repeated despite one or more previous verbal warnings.
- 2) Goodmorning B.V. may also issue a written warning without a prior verbal warning if the nature and seriousness of the breach justify such action.
- 3) A written warning shall be placed in the employee's personnel file.

8.3 Annual Leave

- 1) If an employee repeatedly reports late for work, for example, Goodmorning B.V. may offer the employee the choice of: deducting the hours not worked from their annual leave entitlement; or receiving no salary for the hours not worked.
- 2) Goodmorning B.V. shall only apply the measure referred to in paragraph 1 if previous verbal and/or written warnings have not resulted in any improvement.

8.4 Refusal of a Salary Increase, Bonus and/or Promotion

- 1) Goodmorning B.V. may decide not to grant a promotion, salary increase and/or bonus.

8.5 Demotion and Transfer

- 1) An employee may be assigned to a lower position and/or transferred to another branch or workplace.
- 2) Goodmorning B.V. shall only apply the measure referred to in paragraph 1 where the seriousness of the breach justifies demotion or transfer and a careful balancing of interests has taken place.
- 3)

8.6 Suspension or Temporary Removal from Duties

- 1) An employee may be temporarily denied access to the workplace.
- 2) Before deciding to suspend an employee or temporarily remove them from their duties, Goodmorning B.V., acting as a responsible employer, shall carefully balance the employee's interest in continuing to perform their work against the employer's interest in imposing a suspension or temporary removal from duties.

8.7 Summary Dismissal

- 1) Goodmorning B.V. reserves the right to impose summary dismissal (dismissal with immediate effect) instead of any other disciplinary measure where the circumstances justify such action.
- 2) Goodmorning B.V. may only proceed with summary dismissal in accordance with Articles 7:677 and 7:678 of the Dutch Civil Code.