

Rijnlands Lyceum Foundation Integrity Code

Preamble: Why this integrity code?

The Executive Board of the Stichting Het Rijnlands Lyceum (hereinafter referred to as 'Rijnlands') believes it important that students and their parents, the organisation's members of staff, national and local government, companies, authorities and other stakeholders can have confidence in Rijnlands as an organisation and in the people who together form the organisation. That is the reason for establishing a number of matters in an integrity code. The code aims to offer members of staff/representatives of Rijnlands a framework against which they can relate and evaluate their own actions. The integrity code is a public document. Rijnlands wants to be held accountable for the content at all times. As a result of the public character, we assume that external parties will also take cognisance of the code and act in accordance with it as far as their relationship with Rijnlands is concerned.

A professional attitude of staff and other representatives of the Stichting Het Rijnlands Lyceum cannot always be laid down in rules. Examples given in these regulations are not meant to be limitative in any way. On the one hand the code aims to present a standard of behaviour, but also to create an awareness among staff, of what we mean by professional behaviour and integrity. The document is not meant as a static document, but as an invitation to staff to discuss professional behaviour in relation to integrity. In a "learning organization" people may ask questions and should be allowed to discuss those matters that might be labeled as the "grey area". If necessary, this code may be amended after evaluation.

This integrity code applies to everyone acting on behalf of or for the benefit of Rijnlands, thus not only to members of staff, principals, directors, other members of the school management, executive director and Supervisory Board, but also to a wider audience: companies and organisations that work on behalf of Rijnlands.

Where this document refers to the 'member of staff', it also means the 'representative' of Rijnlands insofar as the relevant passage applies to this wider audience in view of the contractual relationship.

Core values

Rijnlands and the schools resorting under it operate on the basis of the following common core values:

- Openness, tolerance and respect
- Respect for and appreciation of different ideologies, philosophies and cultures
- Ambition
- Innovation, an entrepreneurial attitude and market focus
- International orientation and perspective
- Professionalism
- Orientation towards development (aiming to be a learning organisation)
- Accountability at all levels
- Community involvement

- Caring

These core values naturally form the foundation for the actions of members of staff of Rijnlands Lyceum foundation.

The full mission and vision of Rijnlands is available on the website www.rijnlandslyceum.nl.

This code was established for the proper conduct of business within Rijnlands as referred to in Article 11.2(2) of the collective labour agreement for primary education 2009 and Article 18.2(2) of the collective labour agreement for secondary education 2011.

Several themes are already elaborated in the articles of association (management charter, code of good governance, internal governance arrangements), regulations, codes of conduct (including undesirable conduct policy, social media protocol, regulations concerning electronic means of information and communication), general terms and conditions and agreements.

General

The members of staff of Rijnlands are deemed to refrain from any behaviour that detracts from their integrity. This not only means that they act in the spirit of this integrity code, but also that they are able to assess risks and vulnerabilities from case to case and that they avoid situations which could make them or Rijnlands vulnerable.

Members of staff of Rijnlands are expected to work in collaboration with others on the basis of honesty, trust and clear agreements. If such an agreement involves any risk or vulnerability they submit this to their line manager.

Staff are also jointly responsible. This joint responsibility borne by members of staff expresses itself in having respect and attention for one another. It is also expressed in recognising everyone's contributions and responsibilities, and preventing every form of intimidation. Members of staff communicate openly and clearly with one another, are accessible to one another, call each other to account and are reciprocally accountable. In the event of a continued disagreement the member(s) of staff will be expected to explain the nature of the disagreement and aim to solve it.

Members of staff make careful use of the available resources, such as money, equipment and furniture. These resources are used for the purpose for which they are intended. Private use is in general not permitted. Professionalism requires that legislation and regulations, internal rules, guidelines and agreements that are known to members of staff and students are complied with. Rijnlands strives to represent a broad cross-section of society in its working community. Diversity enhances working climate and quality of service. Every form of unequal treatment of members of staff and students without any objective or reasonable justification is rejected. Rijnlands endeavours to ensure the careful management of raw materials, energy and resources in its operations.

This code particularly applies to all members of staff and other parties who act on behalf of Rijnlands or who could be deemed to act on behalf of Rijnlands and especially in their relationship to providers of services and products.

Contact with our parents/students/colleagues, external parties

- Rijnlands aims to be collaborative, socially committed, customer-oriented, innovative and professional. This requires a proper, service-oriented attitude of the members of staff towards students, their parents and external organisations.
- Customers are always treated with respect, regardless of their political beliefs, religion, ethnicity or origin. This means no verbal or non-verbal expressions of a sexist or

discriminatory character. During working hours, but also outside work, members of staff speak respectfully about students, their parents and external organisations.

- We handle information about staff, students, their parents and external organisations with care and in confidence. The privacy of all is respected, information is properly stored and no improper use is made of the available knowledge.
- Members of staff handle sensitive information carefully and in accordance with its function. This in any case relates to information that falls within the scope of the Personal Data Protection Act, the confidentiality of which is or should be known, or has expressly been stated.
- Sensitive information is not made available to third parties, unless required by legal provisions or if the executive director or Supervisory Board – if it concerns the executive director himself – authorises the provision of the requested information. When granting permission, legislation that seeks to protect personal privacy is taken into account.
- Within Rijnlands, professionalism is expressed in terms of expert operation, result-oriented working, flexible action, representative action and the showing of commitment. Members of staff handle dilemmas that arise in an honest manner.

Separation of work and private life

Rijnlands attaches great importance to its image as an incorruptible organisation. In order to maintain an unsullied relationship with external parties, we assume a clear separation between work and private life.

- In principle members of staff do not purchase any goods or services from a company with which Rijnlands does or has recently done business. In exceptional situations or if in doubt the member of staff submits this to the line manager.
- The granting of orders to third parties by Rijnlands is scrupulous and transparent, and formalised in the procurement policy. This particularly applies to the granting of orders to companies in which relatives or acquaintances of members of staff of Rijnlands work in positions of influence. These members of staff should not be involved when these agreements are made and the representation of interests should be transferred to their colleagues.
- Members of staff are not permitted to practice business activities on their own account or for the account of third parties with the aid of the property of Rijnlands.
- Members of staff are not allowed to arrange any form of advantage or priority for themselves or for third parties, where the services provided by or on behalf of Rijnlands or its schools are concerned.
- Members of staff will inform the employer of the performance and/or acceptance of paid secondary employment.
- If the activities referred to in the preceding paragraph are, in the opinion of the employer, reasonably in conflict with the interests of Rijnlands, they will not be permitted.
- Additional unpaid activities will no longer be performed by members of staff if these are reasonably in conflict with the interests of Rijnlands. The same applies to positions or additional activities that may affect the independence of members of staff.
- Rijnlands refrains from sponsoring with public funds.

A separation between work and private life is also important within the organisation:

- Members of staff therefore ensure that no undesirable mixing takes place between the maintenance of personal relationships and the maintenance of working relationships, both within and outside the school or Rijnlands, especially in the formal relationship between manager and members of staff.
- With respect to relationships with students, members of staff are always aware of a relative difference in power and take account of this in the treatment of students.
- Members of staff have no contact (including social media) with students other than is necessary for the exercise of their duties and through the regular school media.

- Members of staff act in a professional manner in personal relationships with the parents of students. Information about Rijnlands or the school, which is in principle not intended for third parties, will not be shared with the parents of students.

Promotional gifts

- Rijnlands aims to prevent promotional gifts from being regarded as something in exchange for a service provided or to be provided, or, for example, a not keenly negotiated price.
- It is not a problem if a member of staff occasionally receives a gift with a commonplace character from an external party, such as a bunch of flowers or a bottle of wine, if this is an expression of appreciation. An upper limit of € 30.00 for a gift applies in this case.
- Promotional gifts in the form of Christmas hampers should be limited in value and delivered to the work location and preferably be shared with immediate colleagues.
- Rijnlands does not accept gifts or invitations being delivered to the private addresses of members of staff.
- Rijnlands assumes that external clients adhere to this rule. Gifts that are nevertheless delivered to a private address, whatever their value, will be handed over at the work location by the member of staff.
- The management of the school will determine what is done with the gifts (for example, raffled among members of staff).
- The executive director, if he is personally involved, reports the receipt of gifts, as referred to above, to the Supervisory Board.
- Members of the Supervisory Board report the receipt of any gifts to the Chairman of the Supervisory Board or the Vice-Chairman, if the Chairman is personally involved.

Invitations from third parties

All invitations from clients to dinners, seminars, excursions and events, etc. – whether taking place during or outside working hours – will be reported to the manager. A comparative assessment will be made with the member of staff concerned. Attention will be paid here to the opportunities and threats that may be associated with the acceptance of the invitation. In addition, it will be considered from case to case whether the equivalent value of the offer remains within reasonable bounds and has a logical relationship with the nature of the contact. If there is a clear added value for Rijnlands, the member of staff may accept the invitation. Here too, it must not be possible to interpret an invitation as a payment for a favour or service. This means that if there is even the slightest doubt about its appropriateness, the offer must be rejected.

Finally

If a member of staff, a supplier or an external client acts in contravention of this integrity code, we will regard this as a serious matter. The Executive Board of Rijnlands will take the necessary and required steps depending upon the seriousness of the offence. In extreme cases, these may extend to disciplinary action against members of staff or to the breaking of the relationship or association with an external client or supplier.

If you believe that this code is not being complied with, then please report this, in the first instance, to the principal of the school or, in the second instance, to the executive director of Rijnlands, Dr. M.W. Knoester. The telephone number is: 071 – 5730910. The address is: Stichting Het Rijnlands Lyceum, P.O. Box 486, 2240 AL Wassenaar. You can of course always contact the Stichting's confidential counsellors (for undesirable conduct and integrity issues): Centrum Vertrouwenspersonen Plus: tel. 0681316936, or by email: info@cvp-plus.nl. See also the Regulations concerning the reporting of wrongdoing, as published on the website.

The Integrity Code is handed to new members of staff upon their appointment and the importance of this code is stressed to them.

The code will be evaluated after a period of four years, or earlier if there is reason to do so.

Enacted on 8 November 2012 by the Executive Director following approval of the Joint Participation Councils for Primary Education on 7 November 2012 and Secondary Education Council on 25 September 2012 and approval by the Supervisory Board on 17 October 2012.