

# LILIANE FONDS AND MIVA INTEGRITY POLICY



Status:	Final
Date:	9 December 2025
Approved by:	Works Council: 18 November 2025
Version:	3.0
Next revision:	December 2027
Amendments:	<p><b>V3 (December 2025):</b></p> <ol style="list-style-type: none"><li>1. The internal undesirable behaviour complaints committee has been replaced by the external Bezemer-Schubad Agency complaints committee. Complaints are not reported through the integrity officer, but are submitted directly to Bezemer-Schubad (amendments in: Integrity Policy and Annexe 3).</li><li>2. If the complaint involves children, the child safeguarding focal point joins the complaints committee (amendments in: Integrity Policy and Annexe 3).</li><li>3. Annexe 3 has been completely revised. The Bezemer-Schubad model regulations now form the starting point. These have been adapted to our organisation.</li><li>4. Complaints from foreign partners regarding undesirable behaviour are not dealt with under the complaints regulations for undesirable behaviour, but under the complaints and whistleblowers' regulations for grant managers. The name of these regulations has also been changed accordingly (see Annexe 7).</li></ol>

# The Liliane Fonds and MIVA Foundation Integrity Policy

## 1. Introduction

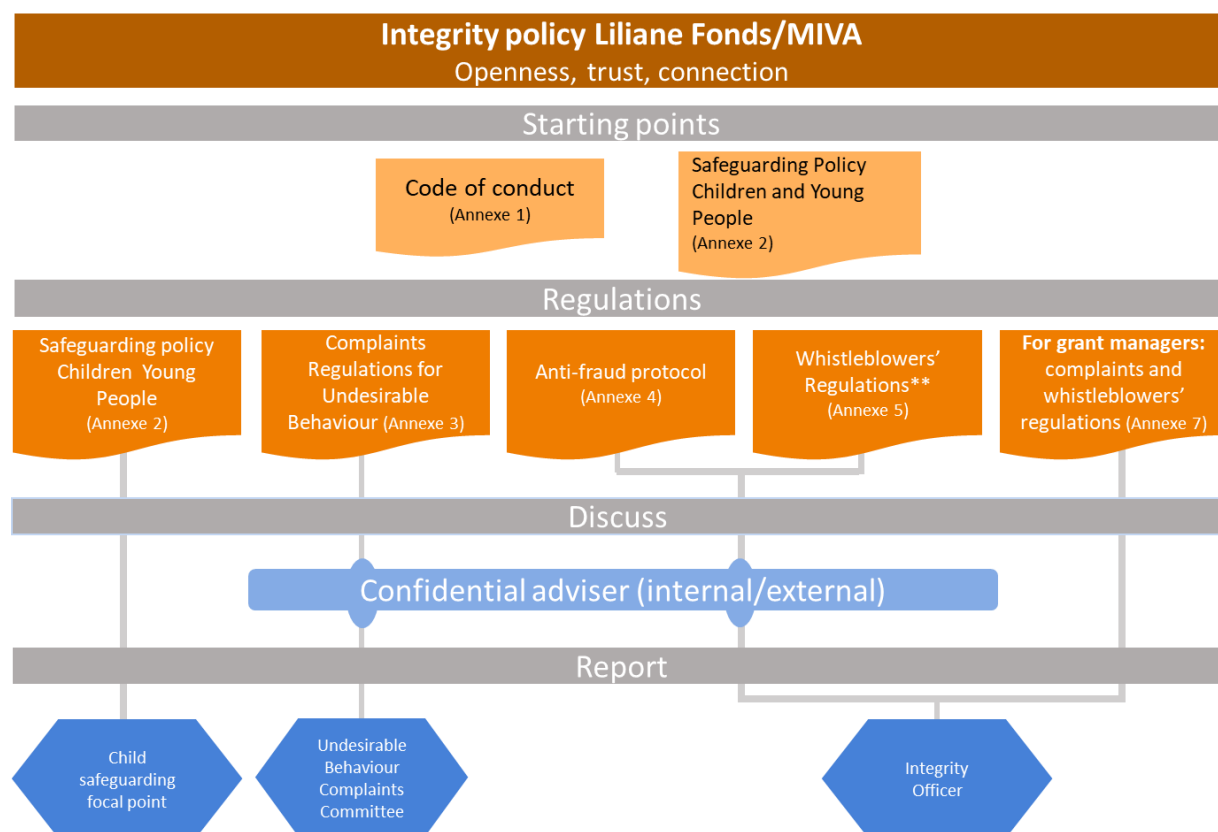
The Liliane Fonds and MIVA Foundation (hereinafter: the Liliane Fonds/MIVA) aims to be an employer that ensures that everyone is able to work in a safe working environment.

The Liliane Fonds and MIVA Integrity Policy provides a coherent framework describing the conduct the Liliane Fonds and MIVA wishes their employees, ambassadors and others working for or on behalf of the Liliane Fonds and/or MIVA to display. By employees, we mean both employed and volunteer staff. 'Others' working for or on behalf of the Liliane Fonds and/or MIVA include self-employed workers and consultants.

By undesirable behaviour we mean:

- undesirable conduct: such as bullying, harassment, sexual harassment, aggression, violence, discrimination and
- unethical conduct: e.g., theft, fraud, abuse of power, corruption.

In this Integrity Policy, we describe how we promote desired behaviour, which arrangements are in place to enforce this desired behaviour, and where to submit reports or complaints to (also refer to the diagram below). This document also contains an overview of all regulations, which have also been attached to the Integrity Policy as annexes.



\* General complaints from the Dutch public under the General Complaints Regulations (Annexe 6)

\*\* Can also be reported to an external authority (such as the ACM, AFM, AP)

## 2. Prevention

We put emphasis on desired behaviour and integrity as soon as we consider a new partnership. In order to obtain sufficient assurance about the conduct and integrity of a new employee, consultant, self-employed person, or other hired staff member at the start of the collaboration with this potential employee, we take the following measures:

- For every employee who enters paid employment (including temporary employees such as self-employed persons), the supervisor performs a reference/integrity check with two referees before the job interview takes place. The referees will always include one recent close colleague, preferably a manager. The applicant will be asked to agree to this.
- Anyone entering into an employment or cooperation contract for a definite or indefinite period of time with the Liliane Fonds and/or MIVA must provide a Certificate of Conduct (*Verklaring omtrent gedrag*, or VOG). The Liliane Fonds/MIVA will reimburse the associated costs. The requirement for a VOG also applies to self-employed persons, volunteers, consultants, ambassadors, external workers who travel on behalf of the Liliane Fonds and/or MIVA, for example, and other hired staff. Once employed, employees must renew the VOG certificate after four years. Self-employed persons and/or consultants are required to renew a VOG certificate after two years.
- HR discusses the content of the Code of Conduct during the job interview. This provides an opportunity for the new employee to discuss any dilemmas from his/her/their past.
- A clause has been added to the employment contract in which each employee subscribes to the Code of Conduct.
- New volunteers also sign the Code of Conduct, which they receive at the same time as the volunteer agreement.
- New employees and volunteers are required to attend an introductory meeting that takes a more in-depth look at integrity and undesirable behaviour.
- Mandatory awareness sessions for employees and volunteers on integrity and undesirable behaviour are organised every year. Deliberations on moral issues are also regularly held.

## 3. Starting points

### 3.1 Code of Conduct (Annexe 1)

The Code of Conduct has been prepared as a document that every employee and others working for or on behalf of the Liliane Fonds and/or MIVA personally sign. It forms the frame of reference for the behaviour we consider desirable. The Code of Conduct does not contain an exhaustive list of concrete rules of conduct, but it is primarily a document containing values with the goal of engendering responsibility in each employee for their own actions. The Code of Conduct also includes provisions on the Children and Young People Safeguarding Policy (Annexe 2).

### 3.2 Safeguarding Policy Children and Young People (Annexe 2)

The Liliane Fonds/MIVA and its partner organisations have a Children and Young People Safeguarding Policy. The interests and protection of children and young people with disabilities is paramount to Liliane Fonds/MIVA and its partners. Children and young people with disabilities are especially vulnerable to abuse, maltreatment or violence due to their physical or mental impairment. When working with children, young people, and their parents/carers and guardians, the Liliane Fonds/MIVA and its partners therefore have a special responsibility to ensure a safe environment where children and young people are not at risk of abuse, maltreatment and violence and their rights are respected. What responsibility this is, how we manage it, and what we do in case of (suspected) transgressive behaviour towards children and young people, is described herein.

## **4. Actions in the event of non-compliance with the Code of Conduct or Safeguarding Policy Children and Young People (Annexe 3, 4, 5)**

The Liliane Fonds and MIVA have implemented

- complaints regulations for undesirable behaviour (Annexe 3);
- anti-fraud regulations (Annexe 4);
- and whistleblowers' regulations for the reporting and handling of undesirable behaviour, fraud, abuse, and suspicions thereof (Annexe 5).

Each type of report has its own procedure. There are also differences in the definition of the problem and the preventive measures taken.

Incidentally, with regard to fraud, we design our (financial) processes to minimise the opportunity for fraud. These processes are beyond the scope of this policy.

## **5. Discuss**

Before an employee or volunteer considers reporting unethical conduct or making a complaint about undesirable behaviour, it is recommended that they first discuss the matter with their manager or with HR.

A Liliane Fonds/MIVA staff member or volunteer can also request a meeting with the internal confidential adviser ([Internevertrouwenspersoon@lilianefonds.nl](mailto:Internevertrouwenspersoon@lilianefonds.nl)) or external confidential adviser (Miriam Smit, 06 – 21 39 74 42 [info@humanresults.nl](mailto:info@humanresults.nl)). The latter will listen, render advice, and keep the information obtained during the meeting confidential.

The function of internal and external confidential adviser is to handle cases of experienced or reported undesirable behaviour. Confidential advisers can also be approached in the event of suspected integrity violations, such as fraud. Confidential advisers can also help formulate a complaint about undesirable behaviour or a report of unethical conduct.

Employment law issues are not part of the confidential advisers' remit; these matters can be discussed by employees with their manager or HR adviser.

## **6. Complaints and reports**

Employees are encouraged to speak up if they have experienced or witnessed undesirable behaviour or unethical conduct. The Liliane Fonds/MIVA stress that making a report is important and necessary to combat undesirable behaviour or unethical conduct and hold the persons involved accountable, as well as to take action to prevent any future recurrence. As also mentioned above, the confidential advisers can provide support with filing a complaint or reporting an integrity violation or suspected integrity violation.

### **6.1 Complaints about undesirable behaviour (Annexe 3)**

A complaint relates to a personal experience of undesirable behaviour, such as bullying, harassment, sexual harassment, aggression, violence, or discrimination. Complaints are handled by the Undesirable Behaviour Complaints Committee. The complaints committee is put together by the Bezemer & Schubad specialist agency.

Complaints can be submitted:

- in writing to the External Secretary of the Liliane Fonds/MIVA Undesirable Behaviour Complaints Committee, p/a Wijnhaven 46, 3011 WS Rotterdam;
- or by email to [info@bezmer-schubad.nl](mailto:info@bezmer-schubad.nl), with the subject line stating: 'confidential for the attention of the secretary of the Liliane Fonds/MIVA Undesirable Behaviour Complaints Committee'.

Further information on the procedure can be found in the complaints regulations for undesirable behaviour (Annexe 3).

If the complaint is about undesirable behaviour involving children or young people, it can be submitted directly to the child safeguarding focal point (email: [childsafeguarding@lilianefonds.nl](mailto:childsafeguarding@lilianefonds.nl)). The procedure is described in Annexe 2.

## **6.2 Reports of unethical conduct (Annexe 4)**

The Liliane Fonds encourages the reporting of unethical conduct, or suspicions or warning signs of such behaviour, within the organisation. These are situations in which the organisation's standards and values are violated. Examples include fraud, conflicts of interest, abuse of powers, or non-compliance with laws and regulations. Reports are made to the integrity officer (email: [integrityofficer@lilianefonds.nl](mailto:integrityofficer@lilianefonds.nl) or [integrityofficer@miva.nl](mailto:integrityofficer@miva.nl)), who is responsible for investigating the report and advising on next steps.

## **6.3 Whistleblowers' regulations (Annexe 5)**

In case of malpractice or alleged malpractice and in situations where the reporting party is dissatisfied with the internal process, an external report can also be made in accordance with the Whistleblowers' Regulations (Annexe 5). A malpractice occurs when the public interest is at stake, for example when there is a threat to public health or the safety of persons.

## **6.4 Complaints from the Dutch public or donors (Annexe 6)**

Complaints from the Dutch public or donors are reported to donor management (email: [voorlichting@lilianefonds.nl](mailto:voorlichting@lilianefonds.nl) or [info@miva.nl](mailto:info@miva.nl)). This is also stated in the general complaints procedure posted on the websites (Annexe 6).

# **7. Regulations for grant managers and local partner organisations (Annexe 7)**

The separate 'Complaints and Whistleblowers' Regulations for Grant Managers' regulations apply to grant managers (Annexe 7). These regulations are aimed at grant managers who

- have complaints about undesirable behaviour on the part of employees or others working for or on behalf of the Liliane Fonds and/or the MIVA Foundation. By undesirable behaviour we refer to all forms of behaviour that go against the law and the values of the Liliane Fonds and/or MIVA, and in particular: harassment, sexual harassment or sexual abuse, discrimination, aggression and bullying;
- have complaints about the policies, activities, statements, or decisions of the Liliane Fonds and/or MIVA;
- wish to report malpractices to the Liliane Fonds or MIVA. A malpractice occurs when the public interest is at stake, for example in the case of danger to public health or to the safety of persons.

External parties outside the EU (for example local consultants) whose work has brought them into contact with the Liliane Fonds, MIVA, or any of the grant managers can also apply these regulations. Local Partner Organisations must first contact the grant manager, but can, in the event of complaints about the grant manager, also apply these regulations.

The reporting point for grant managers is the integrity officer of the Liliane Fonds and MIVA (email: [integrityofficer@lilianefonds.nl](mailto:integrityofficer@lilianefonds.nl) or [integrityofficer@miva.nl](mailto:integrityofficer@miva.nl)). Undesirable behaviour towards children or young people should be reported to the child safeguarding focal point of the Liliane Fonds and MIVA (email: [childsafeguarding@lilianefonds.nl](mailto:childsafeguarding@lilianefonds.nl)).

## 8. Other complaints and regulations

### Employment law issues or internal complaints about policies

We have not drawn up separate regulations for employment law issues or complaints from employees about Liliane Fonds and/or MIVA policies.

- You can report employment law issues to your supervisor and/or the HR adviser. If employment law issues have not been handled satisfactorily, you can report this to the Executive Director.
- In the case of a reorganisation, the social plan describes where and how to file an objection.
- As an employee, you can report complaints about Liliane Fonds/MIVA policies to your supervisor, while complaints of a general nature can be reported to the Executive Director. They will discuss with you how these complaints will be handled.

## 9. Reports

The confidential advisers, the integrity officer (also on behalf of the Undesirable Behaviour Complaints Committee) and the child safeguarding focal point submit summarised qualitative and quantitative yearly reports to the Executive Director on the reports and complaints they have handled. The reports produced by the confidential advisers are anonymous and cannot be traced back to individuals. The Executive Director shares these reports with the Works Council and with the Supervisory Board. The number of reports, the nature of the reports, and their handling are also published on the website and in the annual report. Based on the report, the Executive Director annually determines how the topic of integrity should be spotlighted within the organisation.

## 10. Contact details

Internal confidential adviser:

[Internevertrouwenspersoon@lilianefonds.nl](mailto:Internevertrouwenspersoon@lilianefonds.nl)

External confidential adviser:

Miriam Smit, 06 - 21 39 74 42 [info@humanresults.nl](mailto:info@humanresults.nl)

Integrity Officer (reporting centre):

[integrityofficer@lilianefonds.nl](mailto:integrityofficer@lilianefonds.nl) or  
[integrityofficer@miva.nl](mailto:integrityofficer@miva.nl)

Child Safeguarding focal point (reporting centre):

[childsafeguarding@lilianefonds.nl](mailto:childsafeguarding@lilianefonds.nl)

Undesirable Behaviour Complaints Committee (reporting centre):

in writing to the External Secretary of the Liliane Fonds/MIVA Undesirable Behaviour Complaints Committee, p/a Wijnhaven 46, 3011 WS Rotterdam or by email to [info@bezmer-schubad.nl](mailto:info@bezmer-schubad.nl), with the subject line 'confidential for the attention of the Secretary of the Liliane Fonds/MIVA Undesirable Behaviour Complaints Committee'.

## Annexe: Definitions

a. **Employee:** anyone who carries out activities on behalf of or for the Liliane Fonds and/or MIVA or has carried out activities over the past two years. The nature of the job is irrelevant in this case. This therefore does not only concern permanent or temporary employees, interns, self-employed persons, and other hired staff, but also volunteers, consultants, and other external parties with whom the Liliane Fonds and/or MIVA work together.

b. **Undesirable Behaviour Complaints Committee:** the external committee responsible for handling complaints about undesirable behaviour.

The complaints committee is put together by a specialist agency, Bezemer & Schubad, and consists of a chair and a member. The committee is supported by a secretary (who does not take part in the committee's substantive activities).

In the case of a report of undesirable behaviour involving children, the Liliane Fonds/MIVA child safeguarding focal point will also form part of the complaints committee.

c. **Child Safeguarding Focal Point:** the person appointed by the Liliane Fonds and MIVA who is responsible for supporting and monitoring the Safeguarding Policy and for receiving and dealing with reports of undesirable behaviour involving children or young people.

d. **Confidential advisers (internal and external):** those persons appointed by the Liliane Fonds and MIVA to act as such. The confidential adviser is that person to whom an employee/other person can give his/her account of undesirable behaviour and unethical conduct. The confidential adviser listens, joins in the deliberation process, and offers support to stop the undesirable behaviour, and can also offer support in submitting a complaint or report. The confidential adviser also provides after-care after complaint handling.

e. **Report:** A report is the disclosure of a (suspected) integrity violation or malpractice, whereby the reporting party need not have been directly harmed themselves. Reports can relate to fraud, conflicts of interest, or abuse of powers.

f. **Complaint:** A complaint is a formal expression of dissatisfaction with specific conduct or a situation relating to experiences of undesirable behaviour. The person making the complaint feels that they have been personally harmed, that they are unsafe, or that they have been treated in a way that is undesirable.

g. **Undesirable behaviour:** direct or indirect undesirable comments or actions, in the form of verbal, non-verbal or physical behaviour towards a person, which are experienced by that person as undesirable and/or unwanted and/or constitute a violation of their integrity, in such a way that this leads to psychosocial work stress, including harassment, sexual harassment, discrimination, aggression, violence and bullying, in circumstances directly related to the performance of work.

1. Harassment or sexual harassment is any form of verbal, non-verbal or physical behaviour, of a sexual nature or otherwise, that has the purpose or effect of undermining a person's dignity, in particular when a threatening, hostile, insulting, humiliating or hurtful situation is created.
2. Discrimination is when an employee is treated differently to how another is, or would be, treated in a comparable situation on the grounds of religion, beliefs, political affiliation, race, gender, nationality, homosexual or heterosexual orientation, marital status, age, disability or chronic illness, or when an apparently neutral provision, criterion or procedure particularly affects persons of a particular religion, beliefs, political affiliation, race, gender, nationality, homosexual or heterosexual orientation, marital status, age, disability or chronic illness.
3. Aggression and violence mean incidents in which an employee is psychologically or physically harassed, threatened or assaulted under circumstances directly related to the performance of work.
4. Bullying is defined as all forms of intimidating behaviour of a structural nature by one or more employees (colleagues, supervisors) directed against an employee or a group of employees who cannot defend themselves against such behaviour.

NB. Undesirable behaviour towards children and young people in programmes organised or funded by the Liliane Fonds/MIVA or the (S)POs is described in more detail in the Safeguarding Policy.

h. **Grant managers:** The Liliane Fonds/MIVA works in countries with a network of partner organisations. This network develops and implements country programmes. These programmes are managed by local grant managers. The Liliane Fonds/MIVA concludes a partnership agreement with the grant manager and the grant manager concludes agreements with the local partner organisations.