

Summary of integrity policy of EUR Holding BV¹

EUR Holding BV strives to be an integrity-based *organisation*. That is an organisation that does its utmost to stimulate people within the organisation, individually and together, to conform to social, ethical and/or professional values and norms. Such values and norms form the basis of the rules of conduct within the Holding. But not only the organisation's rules are important. Upholding the rules associated with a profession (such as secretary, manager, lecturer, researcher) also falls under integrity. There is also personal integrity, which has to do with general rules of conduct like decency, honesty, openness. The text below contains a summary of the integrity policy of the Holding.

The starting point is that mostly professionals are working in the Holding. This does not suit a classical hierarchical management style. Obviously, the management indicates the direction to be followed, but employees need enough freedom of action. Rules are there to define the boundaries of that freedom. Upholding them is a shared responsibility.

Rules of conduct within EUR Holding BV

As in every organisation, there are numerous rules of conduct within the Holding. We can distinguish between rules that apply to the entire organisation and ones that apply to specific parts of the Holding (subsidiary companies, Supervisory Boards). As the specific rules can mostly be left to the individual companies, we focus here on the rules of conduct that apply to the entire organisation. Upholding them is important for a pleasant day-to-day interaction and to prevent possible damage to the organisation's reputation. Familiarity with the rules is a preliminary requirement.

Refining and clarifying the rules

Some of the rules of conduct (or norms) of the Holding have been documented, as in the EUR Integrity Code, the Netherlands Code of Conduct for Research Integrity 2018, and the IHS Code of Conduct at the subsidiary company level. The majority has not been formalised, in other words not documented, and are thus possibly unclear. Refining and clarifying them as needed are necessary. It can be tricky to specify the 'important' rules. The selection always has an element of arbitrariness, and an incorrect impression may arise that other rules of conduct do not matter. Despite these obstacles, we give below a list of '*10 golden rules of conduct*' for the entire Holding, with the aim to arrive at a common definition of ethical behaviour.

Fair Play & Teamwork
<ol style="list-style-type: none">1. <i>We act according to generally accepted standards of decency.</i>2. <i>We adhere to academic codes and regulations as well as to general legislation.</i>3. <i>We carefully handle finances, company property and information.</i>4. <i>We support colleagues as much as possible and certainly do not act against them.</i>5. <i>We never make (deliberate) false statements about colleagues, students and clients.</i>

¹ Including the subsidiary companies

Professional conduct in education and research

6. *In our teaching and research, we conform to the , the Netherlands Code of Conduct for Research Integrity 2018.*
7. *In our contract research and teaching, we follow the Declaration of Scientific Independence of the Royal Academy of Science.*
8. *The content of our contract teaching can be determined in consultation with our clients, but never exclusively by them.*
9. *We base our evaluation of the students' performance on explicit criteria known in advance.*
10. *We act independently and avoid even the appearance of improper influence or conflicts of interest.*

In the brochure *Working under the banner of EUR Holding BV*, each of the rules is elaborated in more detail (see the [appendix](#)). A brief explanation is given below.

- Re 1: The EUR definition of 'undesirable behaviour' is adopted (see: http://www.eur.nl/english/staff/hr_policy/rules_of_conduct/policy_on_undesirable_behaviour).
- Re 2: Punishable acts will always be reported.
- Re 3: Employees will provide correct, complete and transparent information about the spending of funds and avoid incurring unnecessary expenses.
- Re 6: All existing and new employees will become familiar with the Netherlands Code of Conduct for Research Integrity 2018 via the Holding's new intranet site
- Re 7: . There is some overlap in 7 with the EUR Code for Contract Research that applies to all contract research.
- Re 10: Employees are open about their different interests and stances, and draw their manager's attention to potential conflicts of interest. The EUR Regulations for ancillary activities apply.

Compliance

The formulation of a code of conduct is an initial step towards a 'working' integrity policy. More is required to achieve an integrity-based organisation. Managers must show their commitment, in their own behaviour and in their response to the behaviour of others. Integrity must remain a permanent focus of attention. Meetings must be arranged in which the employees discuss the rules. This can involve dilemma games, of which three were developed for the Holding: for integrity concerning contract research, contract teaching, and teamwork & fair play. This makes the rules 'come alive'. In addition, the personnel's responses can lead to making the rules of conduct more specific. There must be continuous monitoring of possible changes in the circumstances (internal and/or external) that could require changes in the rules.

To keep the rules alive, it is important to monitor their compliance. This is a task for the managers, including the Supervisory Boards, and the Holding staff. However, they are not the sole ones with responsibility; all of the personnel are supposed to supervise compliance. This can involve addressing a colleague in case of violent behaviour, reporting repeated or serious deviations to the manager or a confidential counsellor advisor (to be appointed). Imposing sanctions for those who deviate, contributes to upholding the rules. A wide range of options is possible, from addressing someone personally to firing that person and even submitting claims for the demonstrable damage suffered by EUR Holding BV or her subsidiary companies.

Integrity provisions within the Holding

The EUR has a number of integrity provisions. The Holding tries to link to these provisions as much as possible, but will create its own provisions where necessary. Linking is possible to the confidential advisor for Scientific Integrity of the EUR (currently Professor dr. Patrick Groenen, ESE), aided by a 'counsellor' for the Holding with specific knowledge of contract research (currently prof em..dr. Justus Veenman). The EUR has no similar provisions for education. Thus, the Holding has to create its own, possibly by giving the specified 'counsellor' this task too.

For the Fair play & Teamwork component, linking to the EUR seems the simplest option, because no Holding-specific problems are expected. However, the confidential counsellors of the EUR focus primarily on undesirable behaviour and are not formally deployed for the Holding. For this reason, a Confidential Counsellor has been appointed for the Holding. He/she can do his/her work on the basis of regulations and procedures for the reporting of inappropriate behaviour and suspected abuse (fraud, etc.). The Holding also has a Complaint Committee (COOM) that will advise the CEO's of the subsidiary companies in case of a formal complaint.

Conclusion

Finally, we answer the question of why the Holding is paying so much attention to integrity. The reason is not that suddenly everything is 'going wrong', nor is there the expectation that this will happen in the near future. Quite simply, the reason is that we want to provide a pleasant and safe working environment for us all, and that we must prevent any form of damage to the Holding's reputation. This is an interest shared by the Supervisory Board of EUR Holding and its subsidiary companies, management and staff.

Appendix: Brochure *Working under the banner of EUR Holding BV*