Undesirable Behavior, understood as:
- sexual harassment
- bullying
- discrimination
- aggression (including intimidating behaviour)
- violence
in the workplace and/or study environment.

(Alleged) Misconduct includes:
- an (imminent) criminal offense, such as theft, corruption and forgery
- a gross (imminent) violation of EUR Holding BV laws, regulations or policies
- an (imminent) danger to public health, safety or the environment
- a (threat of) deliberate misinforming of public bodies
- a (threat of) deliberate withholding, destruction or manipulation of information on acts described in the first 4 bullets.

(Suspected) Violations of Scientific Integrity, including amongst other things:
- academic misconduct
- deception
- wrongful use of intellectual property rights.
EUR Holding BV Regulations On Reporting Undesirable Behaviour And Complaints Procedure

1. Report (oral or written) (4 and 5)
   1.1 Report to official within EUR of EUR Holding BV other than Confidential Counsellor (5.2)
   1.2 Confidential Counsellor (2)
   2. Request handling of report (5.3)
   3. Investigate report (5.3)
   4. Director Subsidiary Company
   5. Notification handling report (within 6 weeks) (5.3)
   6. Consult
   7. Informant
   7.1 Satisfied
   7.1.1 Case concluded
   7.2 Not satisfied (6.1)
   7.2.1 7A
   7.2.2 Case concluded

Informant waives informal procedure

Initiate formal complaints procedure within EUR Holding BV (see next page) (6)

Report to Police

Number+arrow: step sequence
Number in red parentheses: refer to regulation Article
Regulations On Reporting Undesirable Behaviour And Complaints Procedure, Page 1
(6.2) Formal (written) Complaint (within 3 years):
  a. Personal details, date, description undesirable behaviour.
  b. Name of the accused, time and place where undesirable behaviour took place, description of steps taken by the complainant.

If possible:

(8) Handle complaint
   1. Inform the accused and give opportunity to respond
   2. Hear all parties and possibly experts
   3. Submit report hearings to all parties for comments
   4. Advice to CEO of EUR Holding BV

(9) Advice incl. conclusions + recommendations

(10) Decision incl. conclusions + recommendations

(11) Complainant/Accused

(12) Alleged criminal offense

(13) Inform

(14) Case closed

(10.7) Appeal ad hoc dispute committee

(10.10) Judicial action

COOM (3)

CEO of EUR Holding BV

Receipt confirmation

Decision to handle complaint

Handle complaint YES (8)

Handle complaint NO

Request advice on intention not to handle complaint (7.3)

Request advice (9)

COOM, Confidential Counsellor

Appeal well founded (7.5)

File Report

Chair of Supervisory Board EUR Holding BV

Police

Complainant/Accused

Number+arrow: step sequence

Number in red parentheses: refer to regulation Article

Regulations On Reporting Undesirable Behaviour And Complaints Procedure, page 2
(5.5) There is:
- acute danger, where a serious and urgent public interest would require immediate external reporting;
- a reasonable fear of reprisal or retaliation as a result of internal reporting;
- an obvious threat of embezzlement or destruction of evidence;
- a previous internal report of the same misconduct, but which has not led to neutralising of the misconduct;
- a legal obligation to direct external reporting.

Internal handling report
(elaborated on next page)

Informant withdraws report (3.7)

Satisfied

C1

C

C2

B1

B2

B3

NOT satisfied (5)

- Disagree with conclusions and suspicion that report has been wrongfully dismissed
- Conclusions not received within required time period

Case closed

External reporting

Number + arrow: step sequence
Number in red parentheses: refer to regulation Article

Regulations On Reporting Misconduct, page 1
5

- **Internal report Employee (4.1a)**
  - Manager
  - Director subsidiary com.

- **Internal report Student (4.1b)**
  - Education supervisor
  - Director subsidiary com.

- **Internal report Client (4.1c)**
  - Contact person
  - Director subsidiary com.

- **Internal report Third Party (4.1d)**
  - CEO Holding

- **Confidential Counsellor**

- **Consult (4.2)**

- **Investigate report (2)**

- **COOM (2)**
  - Request to initiate investigation (4.6)
  - Advice

- **CEO of EUR Holding BV**
  - Receive notification (4.5)
  - Case closed
  - External report (5)

  (If CEO of EUR Holding BV is involved, then Chair of Supervisory Board EUR Holding BV assumes duties of CEO) (4.1e)

- **Informant / COOM**
  - Take decision and inform all stakeholders (4.7 and 4.8)

Number + arrow: step sequence

Number in red parentheses: refer to regulation Article

Regulations On Reporting Misconduct, page 2