



Code of Conduct

Visser & Smit Hanab



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Visser & Smit Hanab



Visser & Smit Hanab aims to ensure that all its employees can carry out their work in a safe, healthy and pleasant atmosphere.

As an employer, this is our responsibility. However, we can't do this on our own: our employees too, play an important part in creating a good atmosphere. Our Code of Conduct sets out guidelines as to how we should act towards each other and what behaviour is deemed acceptable and unacceptable.

Together with the VolkerWessels Code of Conduct and our core values: Klantgericht (Customer-oriented), Vooruitstrevend (Progressive), Integer (Honest) and Professioneel (Professional) (KVIP), the Visser & Smit Hanab Code of Conduct describes the kind of conduct which is expected of all those working at Visser & Smit Hanab.



The Code of Conduct applies to all employees working for Visser & Smit Hanab and all its affiliated companies.

It also applies to those who are otherwise contracted to work for us. This includes, for example, freelancers, temporary staff and trainees.

For more information about this Code of Conduct and the VolkerWessels Code of Conduct, please contact the Human Resources department.

Please note:

Although this Code of Conduct refers to employees in the male form, this includes both male and female employees.

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1. Working hours

Normal working hours for office staff are from Monday to Friday between 8.15 a.m. and 4.45 p.m. (including a half-hour lunch break). If the working hours for a particular office differ from this, this will be indicated at the office in question. Individual employees can agree to different working hours in consultation with their manager.

The normal working hours for project-based employees are from Monday to Friday between 7.15 a.m. and 4.00 p.m. (including a fifteen-minute morning break and a half-hour lunch break). Different working hours to these can be agreed by the project supervisor after reasonable consultation with the employees concerned and made known on the notice board.

2. Workplace

It is essential to keep a clean and tidy workplace, not just from a hygienic point of view, but also for the sake of personal health and safety. Visser & Smit Hanab attaches great importance to this.

Office staff are expected to observe the following with respect to their workplace:

- Ensure a clean and tidy workplace.
- Valuables should be locked safely away (whenever possible).
- Don't leave money and other valuables lying around.
- Files, ring-binders and other equipment should be stored away in the designated drawers, cabinets and spaces (whenever possible).
- Lock cabinet drawers, desks and sheds.
- Switch off electrical devices unless otherwise specified.
- Dirty crockery should not be left lying around.
- Do not leave coffee beakers on desks or tables, but deposit them in the designated waste bins.
- Do not place items on top of cabinets.
- Turn lights off in unoccupied rooms.

Employees on construction sites are expected to observe the following rules:

- Store equipment in the designated areas.
- Only eat and drink in the designated break area.
- Keep toilets and the canteen area clean.
- Waste, etc. should be deposited in bags and containers designated for this purpose on site.
- Do not spill oil or chemicals. Should this happen, clear up the spillage immediately (for the sake of the environment).

Cars should be parked in the designated parking areas.

3. Private belongings

Private belongings should be taken home by employees as much as possible. To prevent theft and loss, personal devices and belongings which are left at work at the end of the day should be put away in cabinets and spaces designated for this purpose. If there are no lockable cabinets or areas, these belongings should be put safely out of sight.

Visser & Smit Hanab accepts no responsibility whatsoever for the theft of or damage to private belongings. This applies equally to anything brought onto our own premises or onto sites where we are carrying out work externally.

4. Company property

4.1 Physical property

Visser & Smit Hanab property is used for work purposes. Employees are provided with materials and equipment by the employer so that they can perform their work. The intention is not for employees to take this company property home (except for carrying out work for Visser & Smit Hanab or with the permission of management) or to use it for work for third parties. This might involve, for example, both working tools and office equipment. Employees must treat all company property made available to them with care. Borrowing Visser & Smit Hanab property is only permitted with the approval of the manager. The costs for any damage caused to company property by an intentional act or gross negligence will be charged to the employee. At the employer's request, or in any case on the employee's last working day, the employee will hand the company property back to Visser & Smit Hanab.

4.2 Intellectual property rights

Both domestically and internationally, Visser & Smit Hanab shall be considered to be the owner of all products of intellectual exertions brought about during the employee's contract of employment - and/or as part of performing their job for Visser & Smit Hanab. Remuneration for this is considered to be included in the employee's salary or fee. This might involve the right to drawings and models, the right to a patent, the right to a trademark of Visser & Smit Hanab, etc. This is only permitted on the approval of the manager. The costs of any damage caused to company property by an intentional act or gross negligence will be charged to the employee.

5. Expenses claims

Employees can claim back from Visser & Smit Hanab any expenses incurred as part of their work. Only those expenses considered essential to carrying out the work can be claimed. Expenses claims must be approved and signed by the employee's manager. Claims need to be submitted with original expenses documents.



6. Confidential treatment of information

Employees shall not disclose any information which becomes known to them during their work. This includes information from Visser & Smit Hanab as well as information from VolkerWessels companies and customers.

Likewise, at the end of their period of employment, the employee will not pass on any information which has been made known to them during their work. Know-how acquired may only be used for carrying out the job in question and not for any other purpose. Confidential information must be securely stored away before the employee leaves the place of work and the computer is shut down. Employees shall not speak to the press directly, but refer to the Commercial and Communications department.

7. Dentist/doctor appointments

Employees are expected to make appointments with their doctor, dentist, specialist, physiotherapist, etc. as much as possible outside their hours of work. If this is not possible, the provisions of the relevant collective labour agreement (CAO)/company regulations apply.

8. Privacy

8.1 Registration of personal data

In order to operate as a business, it is necessary to register large amounts of data. This also applies to the personal data of employees.

There are a number of reasons for registering this information:

- For effectuating a contract of employment (personnel management).
- For fulfilling a statutory obligation.
- For legitimate employer interests.
- For management via the management tool.

The management at Visser & Smit Hanab is responsible for processing personnel data. The Human Resources and Payroll Administration departments carry out the data processing. To this end, they also have hard-copy files at their disposal as well as a personnel register and a payroll system. In addition to Visser & Smit Hanab's accountant and the statutory authorities, all aforementioned departments and the direct superior of the employee in question have access to this data. It should be noted that the Health Management department occupies a special position with regard to this. For aspects relating to employee absenteeism, they occupy an independent position vis-à-vis Visser & Smit Hanab as employer. As officially registered healthcare staff (BIG register), nursing staff at the Health Management department have a confidentiality obligation with respect to medical records. This means that the Health Management department is not permitted to pass on medical records to the Human Resources department or the employee's direct superior. The medical records of staff are protected in such a way that these can only be consulted by the staff of the Health Management department and the company medical officer.

Every employee has the right to see their own personal records. Employees can submit a request to the Human Resources department. Furthermore, every employee has the right to ask the Human Resources department to correct their records. This involves the improvement, addition, amendment, removal or screening of data. If these corrections do not impede the interests of the business, the employee's request will be honoured.

Finally, every employee has the right to sign a written objection to the processing of their personal information. The person responsible for this data is required to inform the employee as to whether the objection will be upheld.

8.2 Changes in personal information

In order to ensure that personnel and payroll records are correct, it is necessary for any changes in the data listed below to be forwarded as soon as possible in person (preferably in writing) to the Human Resources department:

- Address
- Telephone number
- Addresses in case of an emergency
- Birth or adoption of a child
- Marital status
- Cohabitation
- Death of a family member
- Acquisition of qualifications (certificates)
- Bank account number
- Current and valid proof of identity (exclusively for any changes or studies).

In the event of negligence or non-timely submission of new information, any consequences are fully at the expense of the employee.



9. Clients and neighbours

9.1 Correct behaviour

In addition to what is written in the Code of Conduct, Visser & Smit Hanab expects appropriate behaviour, for example, vis-à-vis clients, colleagues and neighbours. Dealing correctly with clients and people who work and live locally is an important part of this. This also involves passing on complaints from clients and neighbours to management and preventing unnecessary disturbances. Employees must familiarise themselves with the conventions of the country/locality in which they are working or in which they are doing business and observe these as much as possible. Employees must also be aware of local religious, political, social and ethno-cultural values.

9.2 External regulations

Employees need to be familiar with the laws of the country in which they are working or where they do business and to abide by these. It is important for employees to obtain expert (tax/legal) advice from a specialist within our office or from a reputable firm externally. It is not the intention for employees to make their own interpretation of any statutory regulation. The advice of management must be obtained whenever local statutory measures and ordinances are at odds with Dutch law, the Visser & Smit Hanab Code of Conduct, the VolkerWessels Code of Conduct or with generally accepted social values.



10. Safety

10.1 General

Visser & Smit Hanab places the safety of its employees high on its list of priorities. For that reason, all employees must observe the safety procedures current within the company. For the sake of completeness, we refer you to our Business Management System and to Visser & Smit Hanab Health, Safety and Environmental Regulations. Before starting any job, every employee is required to evaluate the risks associated with it and decide on the measures that need to be taken. This visual and mental evaluation of risks is called the Last Minute Risk Analysis (LMRA).

These risks may involve hazards that both the employee and others too are faced with. If an employee is confronted with an unsafe situation or unsafe conduct, they should always report this to their supervisor and their colleagues involved.

10.2 Personal protection equipment

As part of the safety regulations, anyone entering a Visser & Smit Hanab construction site is obliged to wear the prescribed personal protection equipment (PPE) in places designated as such by Visser & Smit Hanab. If a client operates its own regulations relating to the use of PPE which are stricter than those of Visser & Smit Hanab, employees of Visser & Smit Hanab must observe the client's regulations.

Visser & Smit Hanab provides the staff it employs with PPE appropriate for the risk associated with the task in hand. This may involve a safety helmet, safety footwear, hearing protection and gloves.

Types of PPE

The following PPE must always be worn:

- Safety helmet.
- Safety footwear.
- Relevant working attire.

And, if necessary:

- Safety goggles.
- Gloves.
- Hearing protection.
- Protective clothing.
- Safety vest.
- Fall protection.
- Life-jacket.

**your
SAFETY
is our
REWARD**

10.3 Sanctions

Disciplinary measures will be taken in the event of these instructions being breached. This can range from a warning to dismissal.

11. Addictive substances

11.1 Alcohol and drugs

Visser & Smit Hanab pursues a proactive health policy towards alcohol and drugs: possession of alcohol and drugs, as well as their use and sale, is strictly prohibited during hours of work (this also includes travel to and from work). It is likewise prohibited to turn up for work under the influence of alcohol and/or drugs. You should be aware that consumption of alcohol and drugs outside working hours can affect you during working hours. Neither is it permitted to use or deal in these substances on company premises at the end of the working day.

An employee who is under the influence of alcohol and/or drugs is seriously endangering the safety of themselves and of others. An employee in such a condition is not allowed to carry out any work! If fellow employees suspect that one of their colleagues has turned up for work under the influence of alcohol or drugs, they are obliged to notify the management of this. In such cases, the supervisors – as part of the safety regulations – must refuse the colleague in question entry to the place of work. In the event of a supervisor not being available at that moment, the employees themselves should do this. Absenteeism caused directly or indirectly by alcohol and/or drugs use will be treated as absence without leave. Financial damage to property of Visser & Smit Hanab as a result of alcohol and/or drugs use will be recovered from the employee in question. At staff functions and meetings which take place during and outside working hours, employees are expected to abide by the laws pertaining to alcohol and drugs in the Netherlands (or the country where the employee is working). The employee is always responsible and accountable for (the consequences of) their own actions.

The aforementioned prohibitions also apply to work for or visits to suppliers or clients of Visser & Smit Hanab. If a client operates its own regulations relating to drugs and alcohol which are stricter than those of Visser & Smit Hanab, employees of Visser & Smit Hanab must observe the client's regulations. A breach of these prohibitions can have serious consequences for the offender's contract of employment. This can range from an official warning to dismissal. Any costs incurred by Visser & Smit Hanab associated with this can likewise be recovered from the employee.

If employees themselves are concerned about their own consumption of alcohol and drugs, they can ask for guidance from the Health Management department. Staff of the Health Management department will seek a solution to the problem along with the employee. Any information divulged will be treated confidentially. Employees can also consult the company medical officer if they are concerned about their use of alcohol and drugs.

11.2 Use of medicines

Employees who are under the influence of medicines that affect their performance are not permitted to carry out any work before they have informed their supervisor and the Health Management department about this and have made arrangements to this effect.

When using medicines which may affect a person's ability to drive or to otherwise perform, or when suffering from a physical disorder that may adversely affect safety, the employee shall follow the instructions of the doctor to the letter.

If other employees suspect that one of their colleagues at work is under the influence of medicines that affect performance, they are obliged to inform their manager of this. In such cases, the management – as part of the safety regulations – must refuse the colleague in question entry to the place of work. In the event of the manager not being available at that moment, the employees themselves should do this.



12. Smoking

Smoking at work is forbidden by law. Visser & Smit Hanab too, believes it is important to protect its employees from irritating and harmful tobacco smoke. For that reason, it is not permitted to smoke in the workplace nor in any other place where (smoking and non-smoking) employees (might) meet. In short, this means smoking is not permitted anywhere in Visser & Smit Hanab buildings except where smoking areas have been created which comply with the statutory regulations. Special smoking areas have been designated outside the buildings.



This also applies to staff meetings and other special events.

On construction sites, smoking is not allowed in building sheds. If there are more sheds on site, one of which is not used for work or canteen purposes, one unit may be excluded from this smoking ban. The project leader will decide on this (in agreement with the client).

If, in spite of this, you should find someone smoking in an area where you are working, you should submit a complaint to your supervisor. If this does not have the desired effect, you can submit a complaint to the safety expert and/or the Health Management department.

If a client has its own smoking regulations which are stricter than those of Visser & Smit Hanab, then employees are required to abide by these regulations.

13. Inappropriate behaviour

There are many forms of inappropriate behaviour, ranging from discrimination, violence, sexual harassment to taking home company property without permission. Visser & Smit Hanab employees must abide by the provisions set down in the Code of Conduct, and likewise those in the VolkerWessels code of conduct. As far as the latter is concerned, we would refer you to the 'integrity' heading on our intranet site.

If inappropriate behaviour is displayed which is not directed specifically at an individual employee, the employee can report this to the confidential adviser. An example of this might be stealing company property. In such an event the confidential adviser acts as an intermediary to the management. In that case, the employee cannot submit a complaint to the complaints commission for inappropriate behaviour. If any inappropriate behaviour has been shown to an individual or a group of persons, the employee can request mediation and advice from the confidential adviser. We would refer you to appendix 1. The adviser will deal with the issue discretely.

For these types of inappropriate behaviour, it is ultimately possible to submit a complaint to the complaints commission for inappropriate behaviour. This section discusses a number of specific forms of inappropriate behaviour against individuals which Visser & Smit Hanab does not tolerate in any way.

13.1 Discrimination

Direct and/or indirect discrimination on the grounds of skin colour, gender, origins, religious conviction or sexual orientation contravenes the law and is never tolerated at Visser & Smit Hanab: not in recruitment, dismissal and promotion policy, nor in day-to-day work. Management and employees should treat each other in an upright manner. This applies in equal measure when dealing with clients and suppliers.

13.2 Aggression and violence

Aggression and violence are understood to mean any occurrence where an employee is psychologically or physically intimidated, threatened or attacked in work-related circumstances.

Aggression and violence during or concurrent to hours of work and/or on the business premises will not be tolerated by Visser & Smit Hanab. This applies to aggression and violence shown not only to employees but to third parties as well. This also applies to situations in which property of Visser & Smit Hanab or one of its clients is vandalised.

13.3 Sexual harassment

Sexual harassment is not tolerated by Visser & Smit Hanab. It adversely affects the human dignity of men and women alike. Sexual harassment is understood to mean any kind of sexually charged advances which are inappropriate and one-sided in character. Sexual harassment taints the atmosphere at work and can adversely affect the health, self-confidence and performance of employees.

Visser & Smit Hanab does its utmost to protect employees against sexual harassment and the adverse affects of this.

14. Complaints relating to inappropriate behaviour

14.1 Confidential adviser and complaints commission for inappropriate behaviour

Employees who are the victims of inappropriate behaviour can lodge an official complaint with the employer, Visser & Smit Hanab. The employer, in assessing the grounds for complaint, is advised by the complaints commission for inappropriate behaviour. The entire procedure is treated in confidentiality by all individuals involved.

However, before employees submit a complaint to the commission, they must have first tried to resolve the issue with the alleged offender and the manager. The confidential adviser is appointed to assist the employee in finding a solution. The confidential adviser will only take further action when employees have given their express permission to do so. Moreover, an employee who has the impression that a colleague or a group of colleagues is being subjected to inappropriate behaviour, can also go to the confidential adviser.

The confidential adviser also deals with reports of inappropriate behaviour which do not single out a particular individual. An example of this is the previously mentioned case of theft of company property or reported fraud. In such cases, only articles 1 and 2 of the regulations relating to complaints for inappropriate behaviour apply.

Employees who are not satisfied with the outcome of (informal) consultation relating to their complaint vis-à-vis another employee, can subsequently submit a complaint to the complaints commission. This complaints commission is independent and advises the board of directors. It consists of three persons and is made up of two members appointed by the employer (including the chairperson and one member) and another member who is appointed by the Works Council.

As part of its enquiries, the complaints commission will give hearing to the complainant and the individual(s) against whom the complaint is directed, as well as anyone else deemed relevant in the matter. Afterwards it will issue the management with its recommendations regarding the validity of the complaint. The complaints commission will only make its recommendations known to the complainant and to the person(s) to whom the complaint was directed. The management – taking into account these recommendations – will reach a decision on the complaint. The management's final verdict might involve taking structural measures to prevent repetition and/or taking appropriate measures against those guilty of the inappropriate behaviour. The latter can range from an appropriate solution for those involved to dismissal of the offending party.

Steps will be taken to ensure that no reprisals are taken against the complainant. If however, it can be shown that the complaint was made with malicious intent, action will be taken against the complainant. This action will be similar to measures which would otherwise be taken against the person falsely accused if the complaint had been justified.

For the 'complaints procedure for inappropriate behaviour', we refer you to appendix 1.



15. Use of electronic means of communication made available

15.1 Introduction

Many employees at Visser & Smit Hanab need e-mail and internet for their work. Improper use of these costs time, human resources and equipment and presents various risks. These risks might, for instance, include damage to the network from viruses, leaks of company secrets and bringing the good name of Visser & Smit Hanab into discredit.

In order to make employees aware of the boundaries that Visser & Smit Hanab sets with respect to the use of the aforementioned systems, regulations have been drawn up which need to be complied with by employees. These comprise a Code of Conduct with respect to the responsible use of communication and information systems and give transparency about the way in which their use is monitored. The regulations also describe the sanctions that will be imposed in the event of the rules being contravened. The regulations apply to everyone who carries out work for Visser & Smit Hanab in whatever capacity.

General supervision and monitoring of the way in which Visser & Smit Hanab's communication and information systems are used have the following aims:

- Acquiring insight into the way in which electronic means of communication are used.
- Preventing improper use or abuse of the electronic means of communication.
- Safeguarding the system and the network.
- Guaranteeing continuity of the technical infrastructure, preventing interruptions to business processes and other (financial) damage.
- Evidence and archiving.
- Protecting confidential or non-public information.

15.2 Monitoring of electronic means of communication

Monitoring of the use of electronic means of communication is carried out by the ICT department, but only with a view to attaining the aforementioned objectives and on the request of the management. In principle, monitoring takes place on a random basis looking at the totality of data: this cannot be traced back to individual users. Nevertheless, if there is any reasonable supposition to believe that an individual user or group of users is abusing the system, this can lead to more specific enquiries taking place.

In principle, monitoring is limited to data on e-mail traffic (data relating to sender, destination, subject, date and time) and use of the internet and is coordinated by the head of the ICT department.

Monitoring of content takes place on the approval of management only when there is serious cause to do so. The Works Council will be informed about this without the individual concerned being named. The data concerned will be stored as long as is necessary pending further investigations and any measures that might be taken against a user.

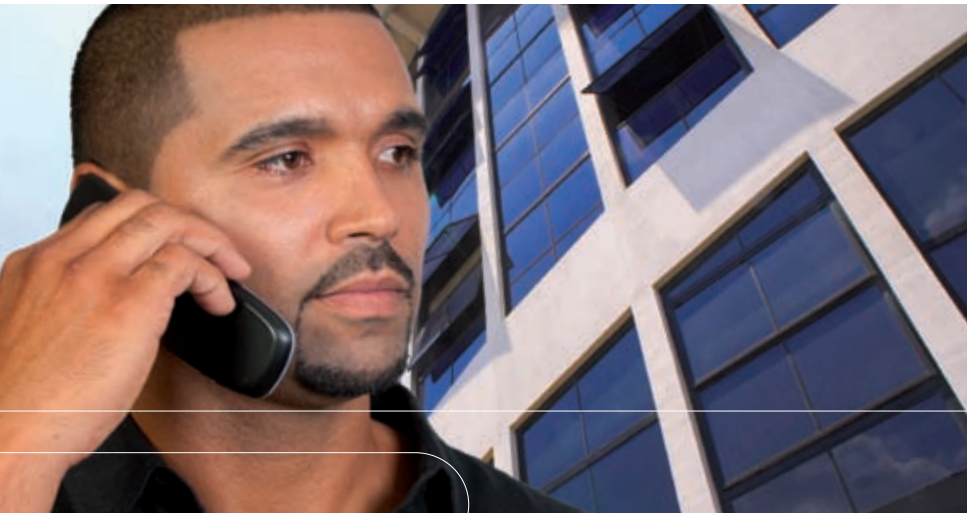
For the Regulations for electronic means of communication, we refer you to appendix 2.

15.3 Use of telephone and voice-mail

Telephone: Both telephones made available in the workplace and mobile phones made available to individual employees are intended for business use only and may only be used for personal use in very limited cases. This applies to applications using voice, SMS, MMS, WAP and all other possible future applications.

It is not permitted to use telephones for private international calls, with the exception of short, occasional calls. Likewise, it is not permitted to use the telephone for premium-rate numbers (so-called 0900-numbers) with the exception of standard information numbers (e.g. KPN information line). Whilst driving a car, it is only permitted to use a mobile telephone in hands-free mode.

Any costs that result from inordinate private use can be deducted from the employee's salary. Mobile telephones may not be used for purposes that are at odds with the rules and policy of Visser & Smit Hanab.



15.3 Use of telephone and voice-mail (continued)

Voicemail: If voicemail is used, there may be some confusion as to whether the receiver has actually received the caller's message, and has therefore taken any necessary actions arising from the message.

To avoid this confusion, the following rules apply at Visser & Smit Hanab:

- The owner of the mobile phone should ensure the caller is aware of the owner's absence if this is for a longer period by changing the outgoing message or switching this off completely.
- If the caller leaves a message on the voicemail, they should not automatically assume that the receiver has actually listened to the message. For important messages, this needs to be verified.

16. Whistle-blowers' regulations

All VolkerWessels employees, regardless of their position, can report suspected wrongdoings within VolkerWessels. Reporting such incidents will have no repercussions for (the position of) the individual reporting the suspected malpractice as long as it is made within the guidelines set out for this purpose. For more information on the procedure and actions arising from the reporting of such incidents are contained in the whistle-blowers' regulations which can be found under the 'integrity' heading on our intranet site.



Regulations relating to complaints about inappropriate behaviour

Definitions

Employer:	Visser & Smit Hanab
Confidential adviser:	officer designated by the employer who can be turned to for advice and support by those confronted with inappropriate behaviour.
Complaint:	written statement by an employee (complainant) about inappropriate behaviour shown by another employee.
Complainant:	the person submitting a formal complaint to the complaints commission.
Accused:	employee against whom the complaint has been made by the complainant.
Complaints commission:	the independent commission to which the complainant can submit the complaint.

Article 1 the Confidential Adviser

The head of Human Resources at Visser & Smit Hanab fulfils the role of confidential adviser at Visser & Smit Hanab.

Article 2 tasks of the confidential adviser

1. The confidential adviser is tasked with supporting, counselling and advising employees who are subjected to inappropriate behaviour from others at Visser & Smit Hanab.
2. The confidential adviser undertakes action with respect to the (informal) complain only after having received permission from the complainant.
3. By making enquiries and talking to those involved, the confidential adviser will try to arrive at a solution.
4. If required, the confidential adviser will support the employee in submitting a complaint to the complaints commission for inappropriate behaviour.
5. Inappropriate behaviour that does not single out an individual can be reported in writing to the confidential adviser. This might involve theft, fraud or other contraventions of the VolkerWessels code of conduct. The confidential adviser will assess whether the matter in hand will be dealt with and to what extent this needs to be followed up by the (line) management.
6. The confidential adviser advises management with regard to the prevention and eradication of inappropriate behaviour.
7. Every year, the confidential adviser will write a report in an anonymous form to the employer about the number and the nature of the cases dealt with.
8. The confidential adviser, in carrying out these tasks, is accountable only to the management, whereby the confidential nature of the information is respected.

Article 3 prior consultation

The complainant can submit a complaint about inappropriate behaviour to the complaints commission for inappropriate behaviour. The commission will only deal with the complaint if the complainant has first tried to solve the problem (informally) with the employer.

Article 4 composition of and appointment to the complaints commission

1. The complaints commission consists of two members plus one chairperson. The members of the complaints commission are upright, professional, organisation-sensitive and receptive, and are all experienced in providing help to individuals. Preferably, the commission should include at least one woman and one legal expert.
2. The chairperson and one member are appointed by the employer. The third member is appointed by the Works Council.
3. Members are appointed to the commission for a term of four years.
4. The complaints commission takes resolutions by absolute majority.

Article 5 tasks of the complaints commission

1. The complaints commission is authorised to deal with the complaints of employees in respect of inappropriate behaviour.
2. The complaints commission carries out independent enquiries into the situation and has access to all the information it needs for performing its tasks.
3. The complaints commission is authorised to give hearing to all those it deems necessary for formulating its recommendations.
4. The complaints commission issues its recommendations to the employer as to how the complaint should be resolved. The recommendations are not binding.
5. Every year, the complaints commission will draw up a report in an anonymous form to the employer and the Works Council about the number and the nature of the cases dealt with and the rulings of the employer with respect to these.

Article 6 procedure for submitting the complaint

1. The complainant can submit a written complaint to the chairperson of the complaints commission. Anonymous complaints will not be dealt with.
2. The complaints commission will confirm receipt of the complaint in writing. A copy of the complaint will be forwarded to the individual accused.
3. As soon as possible, but no later than 3 weeks after receiving the complaint, the complaints commission will hear the complainant. The complainant and the accused will be heard separately. The complainant and the accused can be accompanied to the hearing by someone else from within or outside the company.
4. In the interests of the investigation, the complaints commission has the possibility of questioning all those individuals it deems necessary.
5. One of the members of the complaints commission will draw up a report of the hearing. All those involved will receive a copy of this.

6. Within 3 weeks of the hearing, the complaints commission will issue its recommendations in writing to the employer. In any event, the recommendations will include a verdict on the plausibility of the complaint and more detailed recommendations to the employer.
7. Within two weeks of receiving the recommendations of the complaints commission, the employer will come to a final decision on the complaint submitted. If the employer's decision differs from the recommendations of the commission, its reasons for doing so must be clearly specified.
8. A copy of the employer's final decision will be sent to all those directly involved.

Article 7 confidentiality

1. The hearing of the complaints commission takes place in camera.
2. All those who are involved with the (informal) complaint will treat the complaint confidentially and will keep all relevant information about the case to themselves.

Article 8 other

1. The employer will ensure that the position of the complainant is not disadvantaged in the future as a result of the complaint being submitted.
2. If however, it can be shown that the complaints were made with malicious intent, action will be taken against the complainant. This action will be similar to the measures which would have been taken against the person falsely accused if the complaint had been upheld.



Regulations for electronic means of communication

1. The account provided to the employee by Visser & Smit Hanab is strictly private. It is not permitted to give information about user name or passwords to third parties unless this is essential for work to be carried out effectively. The person to whom the account has been provided is responsible at all times for what happens under their name on the network.
2. Visser & Smit Hanab's position as employer is that, by investing its trust in its employees, proper and sensible use will be made of the resources placed at their disposal. No differentiation is made between the different means of communication used by the employee, whether these be online or offline. The way in which these media are treated forms part of the employee's performance as a whole and therefore serves as a basis – if need be – for calling employees to account and for taking appropriate measures.
3. Employees themselves are responsible for saving and storing their files. To this end, a network is made available which enables back-ups to be made every day. Employees are strongly advised not to store files on local data carriers which are not included in the back-up, such as the C-drive of the PC, a USB stick, DVDs, etc.
4. The electronic and communication systems made available by Visser & Smit Hanab are intended first and foremost for business purposes. Their use is therefore linked to the tasks and responsibilities associated with the job. Furthermore, employees are only permitted to use the internet and e-mail systems for non-business purposes to a very limited extent, but nevertheless on the strict condition that this does not interfere with daily work and/or business operations. Moreover, employees are required to abide by the rules and procedures set down by Visser & Smit Hanab.
5. The infrastructure for electronic communication has its own form of vulnerability and its own form of protection. Confidential and business-sensitive information must not be forwarded to persons outside the organisation without the permission of the manager.
6. It is not permitted to perform actions which might cause damage to equipment and software made available.
7. It is not permitted to perform actions which are contrary to the law, public order or public decency with the aid of the facilities. This means, for example, visiting pornographic, racist or otherwise discriminatory websites and the storage or dissemination of such material or references to these. It is expressly forbidden to send messages with an explicitly sexual, pornographic, discriminatory or pernicious content.



8. It is forbidden to participate in gambling or other illegal activities – or to organise these – with the aid of the facilities of Visser & Smit Hanab.
9. It is not permitted to participate in computer games or in private chat sessions with the aid of the facilities of Visser & Smit Hanab. Neither is the buying or selling of goods on internet permitted.
10. It is forbidden to download, to use, to disseminate or to store legal and illegal non-work related material or software with the aid of the facilities of Visser & Smit Hanab (this is understood to include material which infringes the rights of third parties). Streaming of non-work related audio and video files is not permitted.
11. Software, files or parts of files which do not form part of software made available by Visser & Smit Hanab or which have nothing to do with the work of the employee will be deleted by the ICT department. Any software installed by employees themselves will be deleted. This applies equally to e-mails which are infected by a virus or have an attachment with a certain extension. The sender and the recipient will be notified of this.
12. Visser & Smit Hanab reserves the right to block access to internet websites which employees are not authorised to visit.
13. Acting in contravention of these regulations, business interests or generally accepted social values for using the internet – regardless of the nature and the seriousness of the contravention – may result in disciplinary measures being taken. This can range from a warning to dismissal. In the case of contracted employees, the contract of temporary employment can be terminated with immediate effect.







Visser & Smit Hanab

