

Code of Conduct



**Me
We
Work
World**



Workers



Customers



Community



Governance



Environment

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1. Introduction

Academica University of Applied Sciences (“Academica”) is committed to conduct its business fully compliant with all applicable laws and regulations and in an ethical manner. We expect our employees to show the same commitment and have adopted this Code of Conduct (“Code”) to outline how this should be translated into behavior.

This Code provides guidelines for behavior and expectations within the workplace, it outlines our values and principles and describes processes and procedures, such as for registering gifts & hospitality, conflicts of interest and for the processing of internal complaints.

The Board of Directors is the ultimate owner of the Code.

Mission, vision & values

Academica LifeLong Learning is an expertise center for accredited professional education. Our dedicated services focus on leadership, organization development, high performing professionals and sustainability. We connect, develop and accelerate people, process and strategy. Me – We – Work – World.

At Academica, we believe that we can build a future that is based on social justice, sustainability and inclusivity. Our mission is a better life through better education, transparent governance and leadership and a focus on sustainability.

To achieve our mission, we are guided by these 4 values:

1. Education

We believe in the important role of education to fight inequality of opportunity in order to prepare people to be active citizens of democratic organizations and countries.

2. Excellence

We are committed to always improve our way of working and educating to reach the highest possible level of quality.

3. Sustainability

We acknowledge and fulfil our societal responsibility. The 17 Sustainable Development Goals, developed by the United Nations, determine our strategy.

4. Leadership

We want to be leader in the field of professional education, we acknowledge the need for “lifelong learning”. We teach our students in all our activities to have a sustainable impact on society from the perspective of their personal leadership. By directing the impact as a professional, one can make a difference and, in this way, shape life by learning.

We professionalize individuals on the following 4 levels:

ME: who am I and how can I improve my performance?

WE: whom in my surroundings do I inspire, have an effect or impact on and how far is my reach?

WORK: what does professionalism and leadership mean in my workplace?

WORLD: what is the added value to society?

In this context, Academica offers sound, accredited, blended and modular (Master level) education. Students, schools and organizations are enabled to professionalize flexibly, share experiences, do research and publish.

Applicability

This Code applies to all employees (including temporary employees and contractors), directors, officers, and board members at Academica, which, for the purposes of this Code, encompasses group companies. We also expect all people with whom we engage, including agents, independent teachers, representatives, intermediaries or other third parties authorized to act for or on behalf of Academica, as well as joint ventures where Academica does not have a controlling interest in, to respect and abide by comparable standards of conduct.

2. Our People in the Workplace

We acknowledge that people differ from one another and should be treated equally in equal situations. Therefore, we respect the rights and dignity of each of our employees and of those we interact with. We believe in diversity and respect each individual's beliefs and way of living. Above all, we operate in an environment of respect, mutual trust, cooperation and open communication. We do not tolerate any kind of discriminatory behavior.

This Code sets forth a set of guidelines and instructions of how we interact with our employees, customers and other third parties.

Diversity & inclusion

Academica strives for diversity and equal employment opportunities for all. We aim to create a safe working environment and do not tolerate any form of abuse or harassment.

We work within the framework of all applicable Dutch legislation, including applicable labor laws, and commit to taking decisions regarding recruitment, promotion and development of our employees based on their relevant skills, education, performance and potential. Factors such as race, age, religion, gender, sexual orientation, marital status, disability and such do play no role in reaching those decisions.

Harassment

Academica does not tolerate sexual or other forms of harassment, discrimination, bullying or intimidation in the workplace, either explicitly expressed or through actions or behavior. We expect our employees to treat others with respect and to avoid any inappropriate situation. For Academica, harassment includes and is not limited to:

- Offensive or abusive language.
- Sexual advances or remarks.

- Intimidating or threatening behavior, especially in a hierarchical relationship.
- Dangerous, abusive or violent behavior or the threat thereof.

If you are the victim of or witness to harassment, contact Academica's Confidential Advisor (confidentialadvisor@academica-group.com). Your submission is treated with the utmost confidentiality and Academica does not tolerate retaliation in response to your submission.

Workplace safety

We care about the health and safety of all of us and therefore take all required measures in our workplace to prevent work-related accidents and illnesses, both physical and mental. We build awareness of any potential risks and how they should be managed. Smoking is not allowed anywhere in or around the building. We strictly forbid working under the influence of illegal substances or alcohol. Any violation of this rule is punishable with immediate dismissal.

Company assets

Academica's assets include property, equipment (such as printers, laptops/computers, phones and all ancillary devices and cables), furniture, copyrighted documents and texts, and funds. We expect you to protect these assets and ensure that they are not misused or wasted. Limited personal use of the equipment that Academica has provided to you is allowed as long as it does not interfere with the execution of your work, does not lead to any costs for Academica and is not related to any illegal or inappropriate activity. Please check the *AVG and IT Policy* for any consequences related to a breach of this obligation.

3. Our Way of Working

Academica is committed to a compliant and sustainable way of working in the world that it operates in. This means that we comply with all relevant laws and regulations. In addition, it means that we choose our business partners carefully by evaluating the way that they do their business, so that we conduct our core business in the most sustainable way possible and aim to increase sustainability awareness through our teachings.

Conflicts of interest

A conflict of interest arises when your personal interests or those of a friend or relative, interfere or could potentially interfere with the interests of Academica and could impair you to make impartial business decisions. Therefore, these conflicts should be registered and declared to your line manager or to the Confidential Advisor for assessment.

Gifts & hospitality

Giving to or receiving gifts and hospitality from third parties (i.e., non-employees) is often accepted and polite, especially around holidays, birthdays etc. However, when gifts or hospitality is too lavish or disproportionate, it could result in improper influence and be viewed as bribes and as such, forbidden. When giving or receiving gifts or hospitality, use your common sense and cultural awareness in assessing whether such a gift or hospitality is proportionate to the intention.

Some gifts are never acceptable:

- Cash or cash equivalents, such as: gift vouchers or discount coupons.
- Repetitive gifts.
- Lavish personal gifts, such as jewellery and watches, phones and tablets.

Some gifts are always acceptable: branded items of nominal value (for example pens, notepads, mugs, calendars, t-shirts), gifts for specific holidays such as a small box of chocolates or a bouquet of flowers.

In all other cases, if you have doubts about the appropriateness or the value of a gift or hospitality, turn to your line manager or the Confidential Advisor for advice.

Anti-bribery & corruption

Academica has zero tolerance for any form of bribery or corruption, and we abide by all applicable laws in this respect. We do not offer, pay, or accept bribes or kickbacks for any purpose, either directly or through a third party. We do not make facilitation payments or permit others to make them on our behalf. Refusing to pay or accept a bribe never has an adverse consequence, even if that refusal results in loss of business.

What is considered bribery?

Anti-bribery laws prohibit a person or company from offering, promising or paying a bribe to a person (both government officials and employees in private companies), for the purpose of influencing this person in his function. These laws typically also prohibit accepting or soliciting a bribe and facilitating a bribe. This means that offering, promising or paying a bribe using a middle person, does not exonerate the middle person, who is considered equally guilty.

A bribe is anything of value. This is a very broad definition, examples are: money, equipment, phone numbers, jobs for friends or relatives, ticket to concerts or sport matches. Anything that could persuade the other party to change their behavior, this includes facilitation payments (small payments made to government officials, usually to speed up a process).

Important in this context is whether the influence is exerted in order to gain or retain business or a business advantage, such as obtaining licenses or permits, decisions as to investigate or prosecute or not etc.

Data & IT

Academica necessarily holds personal data, from teachers, employees, students and other third parties. We are committed to protecting the privacy of individuals and comply with all applicable personal data protection laws such as the European Union's General Data Protection Regulation.

Academica further holds copyrighted texts and documents and is committed to ensuring that these are not used or copied without the proper approval.

For the above purposes, Academica ensures a safe and up-to-date IT environment to hold all personal and copyrighted data, with proper authorizations in place.

4. Our Way of Dealing with Third Parties

The nature of the work of Academica requires us to interact frequently with third parties. These third parties include teachers, students, schools, government officials, suppliers, and consultants, and any other person or entity that is not an employee.

In order to ensure that we only work with reputable third parties who, like us, commit to compliance, ethics and sustainability, we perform due diligence prior to engaging a third party. In addition, we monitor our third parties throughout the life of the business relationship to ensure they operate to the highest standards of quality and integrity and provide Academica with the value they have promised to deliver.

5. Our Way of Communicating this Code

In order to ensure that all Academica's employees, agents, independent teachers and entrepreneurs associated with Academica, our suppliers and shareholders are familiar with this Code, the following communication ways are adopted:

New employees

When hiring new employees, Academica signs an employment contract with the new hire and this Code is annexed to that contract. Further, the new hire goes through an online onboarding program that elaborates on this Code.

Employees

The Code is published on Academica's website. This first edition of the Code is distributed to all Academica employees and all those who represent us, such as teachers, agents.

Third parties

When concluding an agreement with any third party, this Code is attached to the signed documents sealing the agreement. This Code cannot apply directly to them, Academica communicates in this manner with its third parties how it wants to operate in the world and with them in particular.

Publication

This Code is published on the Academica's website. Changes to the Code are communicated via the website as well.

6. Our Way to Speak Up

Academica operates in an environment of respect, mutual trust, cooperation and open communication and expects the employees to act accordingly. Nevertheless, Academica acknowledges that situations could arise in which it is unclear what you should do. In these situations, ask yourself the following questions:

- Does this violate the law or professional ethics?
- Is it consistent with the letter and the spirit of the Code?
- Could it harm Academica or its reputation?
- Could it cause harm to an individual?
- Would I be embarrassed to tell my friends or family about this?
- Would I be embarrassed if it was made public in any way?

If “no” to all questions: you’re good to go! If “yes” or “not sure” to any of the questions is your answer, then seek guidance from your line manager or from the Confidential Advisor. If you have witnessed or are the victim of misconduct or violation of this Code, we urge you to report this. This contributes to our aim to operate in an environment of mutual respect and open communication

How to report misconduct or Code violations

Your first point of contact for reporting an (alleged) violation of the Code should be your line manager, unless there is a compelling reason not to. In this latter case, you should report to the manager higher up the hierarchy or the Confidential Advisor. In all cases can you report by sending an email to confidentialadvisor@academica-group.com.

The following (alleged) violations of the Code should always be reported to the Confidential Advisor:

- Bribery.
- Fraud.
- Harassment.
- Discrimination.

Anonymity or not?

Knowing your identity helps Academica in conducting a thorough investigation into your concerns. We therefore encourage you to identify yourself when reporting misconduct or a suspected violation of the Code. You are always at liberty to report anonymously and Academica uses, in such a case, every means available to investigate the reported conduct without knowing the submitter’s identity.

Process & follow-up

The person who receives the report ensures that it is well documented and reflects the submission as intended. The content is agreed with the submitter, who must acknowledge agreement to the content.

Every submission is sent to one or more Directors for investigation, assessment and, if applicable, for deciding to impose disciplinary action(s). The Director conducts the investigation to the best of their abilities and at their discretion.

The submitter is notified of receipt of the submission within a week, and of the (first or final) results within 4 weeks after the date of the submission. This communication contains the scope of the investigation, including who was interviewed, the outcome and the arguments that led to the outcome. This outcome is final.

Non-retaliation policy

Academica does not tolerate that an employee who seeks advice, raises a concern or reports misconduct in good faith, is retaliated against by, for instance, dismissal. We encourage every employee to follow the Code of Conduct and this includes raising concerns and reporting misconduct.

Likewise, we do not tolerate that an employee makes a report in bad faith, this may be subject to disciplinary actions.



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