

Code of Conduct

Legal Manager Services

Determined by	Management Team Legal Manager
Approved by	Jan-Willem Prakke
Version	1.0
Status	Final
Date	October, 2025
Version history	

Foreword

At Legal Manager, we believe that respect and professionalism go hand in hand. As management, we are committed to creating a safe, inclusive, and positive work environment.

Unprofessional or inappropriate behavior doesn't just affect individuals, it impacts team spirit, productivity, and the overall work environment. That's why we have developed this Code of Conduct: to clearly outline our expectations and to support a healthy work culture.

We are always open to feedback on how we can improve our approach to workplace culture and conduct. Together, we can create a workplace where everyone feels safe, valued, and motivated to do their best.

This Code of Conduct is binding for all employees and forms part of our Personnel Handbook.

The Management Team

1. Scope, applicability and summary of the Code of Conduct

Scope and applicability

This Code of Conduct applies to:

- **Employees:** all staff, regardless of position, contract type, or working hours (including interns, temporary workers, and contractors working under our supervision).
- **Business partners:** customers, suppliers, contractors, consultants, and any third parties acting on behalf of or in cooperation with our organization.

By entering into an employment or business relationship with our organization, all parties are expected to comply with this Code of Conduct and uphold its standards. For business partners, adherence to this Code may be contractually required and is considered an integral part of our collaboration.

The Code of Conduct at a glance

- Respect: treat others as you wish to be treated
- Professionalism: act fairly, responsibly, transparently
- Collegiality: support one another and work together
- Openness: speak up and address issues
- Integrity: honest choices, no conflicts of interest
- Not tolerated: Bullying, discrimination, sexual harassment, aggression or violence, fraud, theft, corruption, forgery, misuse of resources

What to do?

1. Discuss - address undesirable behavior directly if possible
2. Signal – if it persists or is serious, raise with your manager
3. Report – contact the Confidential Counsellor for confidential support

2. Mission statement

The company strives for safe working conditions, respectful interactions, and an open organizational culture. All employees have the right to work in an environment free from stress, (sexual) harassment, bullying, discrimination, and/or (verbal) aggression. Both employees and management share responsibility for developing, implementing, and complying with this Code of Conduct.

Managers and supervisors carry a special responsibility to act as role models. They are expected to actively demonstrate the standards set out in this Code and to promote a safe and respectful workplace in daily practice.

In order to achieve this mission, it is important to define the positive behaviors that guide how we work together.

3. Desirable behavior

A pleasant working atmosphere contributes to a socially safe work environment, which also benefits job performance. Within Legal Manager Services, we strive for professionalism and respect, open communication, responsibility and a collaborative and supportive work environment. This also means respecting each other's privacy and complying with the internal values:

- **Be professional and respectful:** we always maintain a professional attitude and we respect the ideas and perspectives of colleagues and clients – e.g. try to reflect on the effect of your behavior may have on someone else. What one person may see as harmless behavior, another may experience as unpleasant.
- **Engage in open communication:** we engage in direct and constructive conversations - e.g. if you disagree with a colleague, there should be room to indicate this and to discuss it with each other. Always conduct discussions in a respectful manner and try to reach a satisfactory outcome together.
- **Cultivate collaboration and support:** we create a collaborative and supportive work environment. We recognize and appreciate diverse working styles and adapt to one another – e.g. try to respond to colleagues who ask for help.
- **Be responsible:** we take ownership of our work and actions. We contribute actively to the collective success of the team, the atmosphere and the work environment.– e.g. colleagues should be able to rely on each other. Therefore, honor agreements or inform your colleagues in time if you are unable to meet them.

While we encourage and expect these positive behaviors, it is equally important to make clear which behaviors are unacceptable.

4. Undesirable behavior

The broader definition of undesirable behavior that we apply within our organization is based on the Dutch Working Conditions Act (*Arbowet*) and is as follows: *"Behavior that is experienced as inappropriate or hurtful and that has the purpose or effect of making an employee feel unsafe in the workplace."* This duty also reflects the employer's legal

obligation under Article 3(2) of the Dutch Working Conditions Act to implement measures to prevent and limit psychosocial workload (PSA).

The definition above emphasizes how behavior is experienced. Each individual determines their own boundaries regarding what they perceive as undesirable. This is therefore subjective, what one person finds hurtful may not be an issue for someone else. Behavior is considered undesirable when it is experienced as such and results in an employee no longer feeling safe within the working relationship. Since what constitutes undesirable behavior may vary from person to person, this Code provides illustrative, non-exhaustive examples.

- **Bullying:** repeated unwanted negative behavior against which someone is unable to defend themselves. This can be (a combination of) verbal, non-verbal, or physical behavior. Examples: organizational measures (such as pointless tasks, deliberately unfair evaluations by management), social isolation (such as ignoring, excluding, not greeting), invasion of privacy (such as imitating, ridiculing, making jokes about someone's private life), aggressive behavior (such as shouting, swearing, intimidation, physical aggression), gossiping, attacking attitudes.
- **Aggression and violence:** Aggression and violence include all verbal and physical actions whereby a person is harassed, threatened, or attacked. Examples: Shouting at or speaking to colleagues in an intimidating manner. Making threatening gestures (for example, with fists or objects). Insulting, belittling, or using abusive language. Spreading rumors with the intent to harm someone's reputation. Sending aggressive emails or messages with a hostile tone. Physical aggression: pushing, hitting, or other forms of physical violence.
- **Sexual harassment:** any form of sexual advance, requests for sexual favors, or other sexually tinted verbal, non-verbal, or physical behavior in the workplace that is experienced as undesirable. Examples: words (verbal): this includes sexually explicit remarks, jokes, or innuendos. Gestures: facial expressions (non-verbal) e.g. displaying sexually explicit or pornographic images (including via email, WhatsApp, or text message), staring, or making sexually suggestive gestures. Direct: physical contact (physical). This covers all forms of unwanted physical contact. This may include putting an arm around someone's shoulder, grabbing, pinching, kissing, groping, or even rape. Entering someone's "comfort zone" can also be considered a form of physical sexual harassment.
- **Discrimination:** involves unequal treatment of individuals: disadvantaging or excluding people based on personal characteristics such as age, sex (including pregnancy, sexual orientation and gender identity), skin color, or religion. Examples: a deliberate, conscious choice by the person who discriminates. This person intentionally takes action to disadvantage an individual or group (based on personal characteristics). Or an unconscious action or reaction when the person who discriminates is unaware that their behavior is based on stereotypes or prejudices. In such cases, the person may hurt someone without realizing it.

5. Integrity

Integrity means acting honestly, fairly and responsibly, even when no one is watching. It is about making ethical choices, avoiding conflicts of interest, respecting laws and rules, and safeguarding trust in the organization. Breaches of integrity may not only harm colleagues internally, but can also damage the reputation and credibility of our organization externally.

When is integrity a violation or misconduct?

Integrity violation: a breach of internal rules or applicable laws and regulations (e.g. misuse of authority, fraud, corruption, forgery, misuse of resources, breach of confidentiality). Examples of integrity violations include:

- Misuse of authority
- Fraud or corruption
- Forgery
- Misuse of resources
- Breach of confidentiality
- Bribery or accepting inappropriate gifts or favors

Whistleblowing (misconduct in the public interest): a situation where the public interest is at stake, such as risks to public health, safety of persons, environmental harm, or serious abuses that undermine the proper functioning of the organization.

Examples of whistleblowing cases include:

- Concealing serious safety risks for employees or the public
- Environmental violations (e.g. illegal dumping of waste, pollution)
- Large-scale fraud or corruption that harms public funds or services
- Systematic discrimination or harassment affecting groups of employees or clients
- Suppression or destruction of evidence in investigations
- Gross mismanagement or deliberate non-compliance with mandatory regulations

Reporting and procedures

Employees are encouraged to act if they encounter undesirable behavior or integrity violations.

Steps:

1. Discuss – whenever possible, address behavior directly with the person involved.
2. Signal – if serious or unresolved, raise the concern with your manager.
3. Report – contact the Confidential Counsellor for confidential support and guidance.

In cases of serious criminal offences, reporting is mandatory and may require filing a complaint with the authorities. The Confidential Counsellor can also give support in these cases.

6. Confidential Counsellor

The Confidential Counsellor ('*Vertrouwenspersoon*') operates independently and is bound by strict confidentiality, ensuring a trustworthy and safe environment for employees to speak up. The Confidential Counsellor stands only beside the reporting employee, providing support and guidance, but does not take an active role in procedures or mediate between parties.

Employees may contact the Confidential Counsellor regarding undesirable behavior, integrity dilemmas, or situations that feel unsafe.

First point of contact and support

The Confidential Counsellor is there for the reporting employee. Their primary task is to listen, provide support, and offer initial guidance to employees who experience undesirable behavior (such as sexual harassment, aggression/violence, discrimination, bullying) or integrity concerns.

Information and guidance

The Confidential Counsellor provides information on possible routes and procedures (informal resolution, complaints committee, external bodies, legal options). The role is to clarify options, not to provide legal advice or make substantive assessments.

Accompanying, not deciding

The Confidential Counsellor may accompany and support the reporting employee in conversations with management, HR, or in filing a complaint. They do not take decisions, conduct investigations, or handle complaints themselves – these are the responsibility of management or independent committees.

Confidentiality

The Confidential Counsellor is bound by strict confidentiality. Information is only shared with the employee's consent, unless there is a compelling legal obligation (e.g. a criminal offence or immediate danger).

Signaling and prevention

The Confidential Counsellor keeps an anonymized record of reports and signals trends to management, with the aim of improving prevention and reducing Psychosocial Workload (PSA).

Details Confidential Counsellor Legal Manager Services

Legal Manager's Confidential Counsellor is Birgit 't Hart from Trusted Workplace (www.trustedworkplace.nl). Birgit is a certified Confidential Counsellor and specialized in social safety and integrity. Reports and conversations with Birgit are strictly confidential and anonymous.

Support accused employee

Employees who believe they have been unjustly charged with undesirable behavior can contact Trusted Workplace for support. This support may be provided by Sanne Huisman from Trusted Workplace, who is a designated support person for the accused (*'begeleider beschuldigde'*). She offers a listening ear and emotional support; provides information about the process and next steps; helps ensure the accused also experiences a safe and fair procedure. The support person acts independently from the Confidential Counsellor and is not involved in the investigation or outcome. Her role is not to defend or represent the accused, but to safeguard their well-being throughout the process.

7. (In)formal Complaints Procedures for reporting undesirable behavior and integrity violations

Informal complaints procedure

Do you have questions about integrity, are you facing a dilemma, do you notice a potential integrity risk or violation, or are you dealing with undesirable behavior? In that case, your manager or HR Officer is your first point of contact.

- Employees may make a verbal or written report to their manager or HR Officer.
- The Confidential Counsellor may provide confidential support to the reporting employee but will not actively participate.
- A direct conversation with the accused will be arranged within 5 working days, facilitated by the manager/HR.
- Follow-up will occur within 2 weeks to check progress.
- The Confidential Counsellor remains available for confidential support but does not take part in the process.

Formal complaints procedure

If informal resolution fails, a formal complaint may be submitted in writing. Formal complaints, cannot be handled anonymously, since both parties have the right to be heard.

The employer will appoint an independent external complaints committee to handle formal complaints. The Confidential Counsellor may, upon request, provide an overview of available external committees for consideration. The committee must be impartial, independent from management, and composed of qualified experts. This committee will handle the complaint in accordance with its own procedure. In doing so, the committee will adhere to the principles of fairness, confidentiality, and hearing both parties. The committee assesses admissibility based on undesirable behavior, integrity violations or psychosocial workload. If valid, the committee investigates and issues advice to the employer.

During the formal complaints procedure, the Confidential Counsellor may provide support to the reporting employee by explaining the process, assisting with the drafting of a complaint, or accompanying the employee in meetings, but does not play an active role in the investigation, hearings or decision-making.

All employees are expected to cooperate fully with any ongoing investigation regarding an undesirable behavior incident or integrity violation.

The employer has a legal duty of care under Article 7:658 of the Dutch Civil Code to ensure a safe working environment. In line with this responsibility, the employer makes the final decision and implements measures. All associated costs are covered by the employer.

Please note: the Whistleblower Protection Act (Wet bescherming klokkenluiders) formally applies to organizations with 50 employees or more. Although not legally required for our company, the principles of transparency and protection are taken into account in handling integrity concerns.

8. Evaluation

The Code of Conduct will be evaluated annually and, where necessary, revised. Employees will be actively involved in this evaluation process to ensure broad support and continuous improvement of social safety in the workplace. The results of the evaluation will be shared transparently with all staff, so that everyone can see what has been learned and how improvements will be made.

9. Consequences of violation

Violations of this Code, the law, or generally accepted norms and values may result in disciplinary action: official warning, suspension, demotion or reassignment, termination of employment (including the possibility of summary dismissal).