

## Integrity policy HomePlan Foundation – Project partners

### Introduction

Integrity is related to doing justice to the people and organizations with whom and for whom we work. The integrity policy aims to prevent unacceptable behavior and consists on the one hand of a moral learning process (correct considerations for difficult decisions) and on the other hand of enforcement (punishment of violations).

HomePlan has a code of conduct in which the guiding principles are formulated. This code of conduct also serves as a basis for enforcement. The aim is to prevent unacceptable behavior and, where appropriate, to handle it carefully and to provide adequate accountability for this.

Unacceptable behavior is defined as: violations involving abuse of power, financial violations and interpersonal violations.

- **Violations involving abuse of power**

Bribery and corruption: granting and obtaining unauthorized favors in return for services, money or otherwise.

Conflict of interest and nepotism, improper use of information or leakage of confidential information.

- **Financial violations**

Fraud and theft, tax evasion, misuse of data, resources and/or services in any form, culpable waste.

- **Interpersonal violations**

Sexual harassment: unwelcome and/or unwanted advances in the form of requests for sexual favors or other verbal, non-verbal or physical behavior, sexual violence, all other sexual and intimate behavior without consent.

Intimidation, aggression and violence: bullying, psychological or physical harassment, threats, humiliation or attacks on others.

Discrimination: making statements in any form about, performing actions towards or making decisions about persons that are offensive to those persons because of their race, religion, gender, beliefs and/or sexual orientation, or making any distinction based on these factors.

### Prevention – project partners

HomePlan's code of conduct is stated on the website. A code of conduct and an integrity policy do not prevent integrity problems. To prevent unacceptable behavior as much as possible, HomePlan has made the following agreements with its project partners:

- The project partner receives a copy of the code of conduct and the corresponding enforcement protocol being part of this integrity policy.

- The director of HomePlan discusses the code of conduct and the vulnerabilities and risks in terms of integrity violations at least once a year with the project partner (if necessary, the code of conduct or enforcement protocol will be adjusted).
- During these meetings there is also an opportunity to talk to each other about making important and difficult decisions where different interests are at stake (moral deliberation).
- In case of allegations of unacceptable behaviour, HomePlan and the project partners will notify each other and keep each other updated. The policies and relevant legislation of the country involved will be respected.
- By signing a donation agreement, the project partner also agrees with the code of conduct and the integrity policy.
- HomePlan applies a zero tolerance policy towards unacceptable behavior and does not leave this without consequences.

## **Enforcement protocol**

Maintaining the code of conduct is important for a well-functioning integrity system. The enforcement protocol describes what actions must be taken in the event of unacceptable behavior.

### Reporting

Employees, volunteers, including building trip participants, partner organizations or other external parties who are victims of inappropriate behavior or who see that rules of conduct are being violated by partners or within the team, can discuss this with the confidential counselor. The confidential counselor provides initial assistance to those who witnessed or were victims of a violation. The confidential counselor conducts preliminary investigations and advises on whether an official report should be made.

You can report in the following ways:

- with the confidential counselor, namely the director of HomePlan, Marike van Seeters:  
tel: +31 6-53526346 or [marike@homeplan.nl](mailto:marike@homeplan.nl).
- to the chairman of the board of HomePlan: [bestuur@homeplan.nl](mailto:bestuur@homeplan.nl)
- at an external whistleblowing point, the Goede Doelen/Partos reporting point in the Netherlands via [meldpuntgoededoelen@gimd.nl](mailto:meldpuntgoededoelen@gimd.nl) or by telephone +31(0)88-8008524 (Monday to Friday during office hours)

Based on a report, the director, chairman or external whistleblower determines what further steps should be taken: take immediate action if people are in danger and ensure that victims are supported, investigate the nature and severity of the exceedance, discuss exceedances with those responsible, and possibly report it to the police in the event of a violation of the law.

### Research

If a more in-depth investigation is necessary, the recipient of the report draws up an investigation protocol: which questions must be answered, will the investigation be conducted internally or externally, and should the police be involved in the investigation. It is also recorded who has what responsibility and how the rights of those involved are protected.

### Measures

If thorough investigation shows that the code of conduct has indeed been exceeded, the organization can take measures. Depending on the nature and severity of the exceedance, there are various options, from an initial warning to, in very serious cases, termination of the agreement. If necessary, external legal advice will be sought.

Following each report, it is discussed whether enough has been done to prevent the problem and what can be done to prevent recurrence.

### Communication

In the event of significant violations, stakeholders in the organization must be informed. This concerns, for example, embezzlement of significant amounts of money, sexual misconduct within projects or within the team. Stakeholders can be relevant donors, partner organizations or the CBF and Goede Doelen Nederland (Dutch branch organizations) when it comes to matters that could damage the image of the organization or even the entire sector.

For every violation, the balance must be considered between the nature and seriousness of the violation on the one hand and the severity of the communication on the other.

### Accountability

The integrity policy is published on the HomePlan website.

The annual report reports on any integrity violations: number, nature and steps taken. It is also stated whether and how the policy has been adjusted. This policy will be updated annually.

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