



STICHTING AAP INTEGRITY CODE

Stichting AAP is at the heart of society. The particular issue we stand for involves working with our animals and our donors, and we have an on-going sense of social responsibility.

The employees of Stichting AAP (AAP Foundation, hereinafter AAP) perform their work in close interaction with the social environment. It is therefore highly important for our donors and stakeholders to have confidence in AAP as an organisation and in the people who collectively determine AAP's public face. It is for this reason that we wish to lay down a number of matters in an integrity code.

This integrity code applies to anyone working for or on behalf of AAP, i.e. not just to the employees (paid and unpaid), the management and Supervisory Board but also to the businesses and agencies working for AAP.

Where reference is made in this document to “the employee”, this also refers to the “representative” of AAP.

This integrity code is designed to safeguard a number of interests:

- the interests of the animals
- the interests of our donors
- the interests of our employees, Executive Director and Supervisory Board members
- the interests of AAP
- the interests of society

Where reference is made in this integrity code to the fact that an employee makes a disclosure and/or discusses the situation with his/her line-manager or the Executive Director, this means in the case of the Executive Director that disclosure is made to and/or a situation is discussed with the chairman of the Supervisory Board. In the case of a member of the Supervisory Board disclosure is made to the chairman of that Board, with discussion in the full Board.

On certain points we have formulated the code in the form of specific rules, but in many other areas in the form of general codes of conduct. This has been done deliberately. The aim of the code is to ensure that employees or representatives interpret, assess or weigh their conduct effectively within the context in question, and not to take over that responsibility from them.

This integrity code is a public document. We seek to be answerable for the contents at any time. Donors, sponsors, suppliers, clients and other stakeholders can inspect the code on the AAP website: www.AAP.nl.

We consider it important for everyone concerned to abide by this code. It lays down what is and is not possible and what may and may not be done, all this under the motto:

IF IN DOUBT, DO NOWT!! OPENNESS AND TRANSPARENCY COME FIRST!!

Finally: this integrity code is not intended as a legal code with rules and penalties. We are above all hoping to set in motion a process of awareness and dialogue. Are we appraising the consequences and risks of certain situations properly? Are we making the same assessments in each case? Do we talk about things enough with one another? How do we ensure that we not only act ethically but also come across as ethical? All this in the knowledge that it is not always possible to draw a clear dividing line between “good behaviour” and “incorrect behaviour” and that this may differ from situation to situation. It is, accordingly, not possible to specify a course of behaviour for each situation. A number of topics are specified below in relation to conduct and integrity. In certain specific cases not referred to here, separate agreements will be reached that are in line with the rules of conduct set out below.

GENERAL

The employees of AAP are expected to refrain from any form of behaviour that would detract from their integrity. This means not only that they act in the spirit of this integrity code but also that they are capable of assessing risks and vulnerabilities from case to case and avoiding situations that could place them or AAP in a bad light.

If an employee suspects a wrongdoing involving the violation of rules, including the internal rules set out in this integrity code, he/she can resort to the whistleblower regulations, as posted on the AAP website. These set out the action the employee can take and the support that is available for investigating the wrongdoing in question.

We do business with others on the basis of sustainability, honesty, trust and clear agreements. We keep our word. Should an agreement run into difficulties, we will explain the situation. Until a new agreement has been reached, the old one will remain in force.

ACTING IN ACCORDANCE WITH THE OBJECT

- Every employee of AAP is familiar with and endorses AAP's object and operating philosophy.
- AAP's object and operating philosophy have an influence (sometimes major) on the way in which employees deal with animals in general and at AAP in particular, on the private keeping of animals by employees, on the participation by employees in certain sports and entertainment activities in which animals play a role, on the pursuit of hobbies in which animals play a role, on the exercise of certain other positions by employees, on employees' membership of certain associations, and on employees' involvement in certain organisations/groups/institutions. Employees will ensure that there is no question in all these areas of any actions or omissions by them that are at variance with AAP's object and operating philosophy. In the case of doubt the employee should consult his/her line-manager in good time.
- Every employee will refrain from any form of animal extremism that is punishable by law (or assisting therein), including in any event committing or jointly committing any violations and offences in relation to animal extremism, and will not take part in any organisation that is guilty of any form of animal extremism punishable by law and/or radical animal activism punishable by law.

DEALING WITH DONORS

- AAP promotes sustainable business practice and seeks to be proactive, entrepreneurial, customer-oriented, professional and business-like. This calls for a correct, service-oriented attitude on the part of the employees towards our donors. Among other things this manifests itself in business-like and committed behaviour, being of good appearance, and careful and clear verbal and non-verbal communication.
- Donors must always be treated with respect, regardless of their origin, religion, ethnicity or political persuasion. There is no room for verbal or non-verbal utterances of a discriminatory or sexist nature. We speak respectfully about our donors, both during working hours and at other times.
- We deal carefully and confidentially with donor information and property. Donors' privacy is respected, information is properly stored, activities are rounded off properly and no improper use is made of the available knowledge.
- AAP employees treat the donors as they would like to be treated themselves and honour any agreements reached.

DEALING WITH COLLEAGUES

- AAP seeks to create a pleasant and safe working climate. Among other things, this means that the employees deal with one another civilly and respectfully. Recognise and acknowledge your colleagues' limits. Examine yourself and your own behaviour critically. Be open to feedback and don't automatically regard this as criticism. Discrimination, aggression, harassment and intimidation (including sexual harassment) are wrong and will not be tolerated.

- AAP employees treat colleagues as they would like to be treated themselves and honour any agreements reached.

SEPARATION OF WORK AND PRIVATE LIFE

AAP attaches particular importance to its image as an ethical and transparent organisation. In order to maintain proper relationships with external parties, we assume a strict separation between work and private life:

- We do not wish to mix up the contracting relationship with the customer role. In principle that means that employees should not procure any goods or services from a firm with which AAP also has commercial dealings or has done business with in the recent past.
- It will not always be possible to prevent private contacts and private agreements with suppliers, since AAP employees often live in the geographical area in which AAP operates. Employees should seek to avoid entering into such agreements for private purposes, but where this does arise this should be after prior consultation with their line manager.
- We deal carefully, avoiding waste wherever possible, with any operating assets or intellectual property belonging to AAP. Operating assets will only be used for private purposes and intellectual property will only be published with the knowledge and consent of the line manager.
- The placement of orders by AAP with third parties will be carefully and transparently formulated in the procurement policy. This applies in particular to the placement of orders with firms in which employees, including their family members or acquaintances, hold influential positions.
- Employees are not permitted to conduct commercial activities for their own account or on behalf of third parties with the aid of AAP property.
- Employees may not arrange any kind of advantage or privilege for themselves or their relatives with regard to the services provided by or on behalf of AAP.

CONFLICTS OF INTEREST AND ADDITIONAL POSITIONS

- Employees are not permitted to hold down any additional positions that are or could conflict with the interests of AAP. Additional positions must always be notified in writing to the employee's line manager.
- Additional positions in the public sector (even if unpaid) can lead to conflicts of interest. Such positions must therefore be notified in advance to the employee's line manager. This may result in the acceptance of such a position subject to certain limitations or in the resignation of the AAP employee from the additional (governmental) position.
- If an employee holds a substantial financial interest (of 5% or more) in a company or institution with which AAP does business or is likely to do business, this may create an actual or potential conflict of interest. In that case the relevant employee will have a duty to make disclosure in writing to the Executive Director. That also applies to the interests in the form of relatives, friends and acquaintances holding a managerial, decision-making position in that company or institution.
- Members of the Supervisory Board shall abide by the Wijffels Code concerning their independence, and any incompatibility of functions and conflicts of interest.

BUSINESS GIFTS

- It is of course not a problem if an employee receives a gift of an everyday nature, such as a bunch of flowers or a bottle of wine, on an ad hoc basis, where this is an expression of appreciation and involves a sum of no more than €50. Such gifts should always be reported to the employee's line manager. Gifts will as far as possible be divided among the employees.
- It is not permitted to accept gifts from suppliers or clients with which discussions or negotiations are currently being conducted concerning the possible placement of an order or contract.
- Gifts in the form of cash may not be accepted.

- Business gifts with a value in excess of €50 may not be accepted. Any business gifts received should be reported to the employee's line manager.
- AAP wishes to prevent the possibility that business gifts will be seen as a quid pro quo for a service that has been or is to be supplied (e.g. charging less than the full price).
- Gifts delivered to an employee's private address must always be refused or returned take the matter up with the donor.

INVITATIONS FROM/BY THIRD PARTIES

- Any invitations to meals, seminars, excursions and events that could have a bearing on the relationship with the third party in question must be notified to the employee's line manager and discussed in the management team. Where such invitations concern the Executive Director, the chairman of the Supervisory Board will be informed.
- The management team will arrive at a careful decision together with the invitee, taking into consideration the risks and opportunities that acceptance of the invitation could involve. In addition it will be decided from case to case whether the countervalue of the offer is within reasonable limits and in logical proportion to the nature of the contact. Where such offers concern the Executive Director, the chairman of the Supervisory Board will be informed.
- Where there is a clear added value for AAP (e.g. networking or consolidating the relationship in the course of implementing the work) the employee may accept the invitation. Once again we want to prevent the possibility that an invitation could be interpreted as a quid pro quo for a favour or a service. This means that if there is any doubt whatever concerning the suitability of an invitation it should be politely declined.
- Employees giving a lecture or presentation, etc., as part of their job and who receive a voucher or gift in return may accept this provided it does not exceed €50 in value. As well as that, any costs incurred by the employee will be defrayed by AAP.

SPONSORSHIP OF / FINANCIAL SUPPORT FOR THOSE AAP WORKS WITH

- AAP does not sponsor any initiatives serving the private interests of one or more of its employees.
- Any proposals for sponsorship will be discussed in the management team.

OTHER RULES OF CONDUCT

- AAP has its own internal protocol guide. Anyone taken on by the organisation shall be deemed to have taken cognizance of the protocol guide. Among other things, the handbook specifies rules of conduct for working with and in the vicinity of animals, health and safety at work, smoking, alcohol and drugs, and Internet and e-mail use.

IN CONCLUSION

In cases where a violation of the integrity code is suspected or cases where there are differences of interpretation concerning the code, the Executive Director should automatically be involved. Disclosure must always be made of any criminal offence. If an employee, supplier or external client acts at variance with this integrity code, this will be regarded as a serious matter. Depending on the seriousness of the violation, we may then take action.

In extreme cases these could extend to disciplinary action against employees or termination of the relationship with an external client or supplier.