Code of Integrity Gerrit Rietveld Academie

Provisions for employees and students

1. Scope

1. This code applies to the actions of employees, including persons involved in the (organization of) the Gerrit Rietveld Academie (GRA) on the basis of an employment, secondment, agency, internship or other contract of assignment, and to students, including persons enrolled at the GRA in one of the programmes or courses.

2. The integrity code

Failure to comply with this code may result in sanctions. For students, the sanction options as named in the Student Charter apply. Employees are subject to the relevant provisions of the *CAO voor het hoger beroepsonderwijs* (CAO, Collective Agreement for Higher Professional Education), including Chapter P (disciplinary measures such as reprimand, transfer and suspension). For employees without an employment contract, the same provisions apply by analogy and to the extent applicable.

3. Dealing with confidential information

1. Information is confidential when it concerns:
   a. information about the GRA (for example: confidential business information, financial information or contractual information);
   b. information about employees, students or course participants of the GRA (for example: information from employees' personnel files, results, absences, behaviour of students and course participants, notifications, reports about, warnings to or actions taken regarding students or course participants);
   c. information relating to relationships of the GRA (for example: confidential information relating to suppliers, internship locations, visiting professors, alumni, or visitors);
   d. confidential communications between employees and/or (the bodies of) the GRA (for example: communications on the topics mentioned above).

2. Confidential information is handled carefully and in light of its function. This means, among other things, that employees:
   a. share confidential information (internally and externally) only if necessary for a legitimate purpose of the GRA and, to the extent that confidential information is made available to third parties (externally), if permitted under the third paragraph;

b. share confidential information only with persons who need it for that legitimate purpose;
c. be aware of and comply with the latest internal guidelines, procedures and instructions on keeping information secure and confidential;
d. are alert to security risks, such as phishing messages; and
e. use only equipment, software and other tools and services authorized by the GRA when handling confidential information (e.g., employees do not enter confidential information into unauthorized AI tools).

3. Confidential information will not be made available to third parties, unless required by legal provisions and/or the Executive Board or - in the case of a matter concerning (members of) the Executive Board - the Supervisory Board gives permission to provide the requested information to (a) third party(ies).

4. Fraud, theft and private use

Fraud and theft will obviously not be tolerated. Everyone handles the resources of the GRA with care. This includes both tangible resources (equipment, rooms) and intangible resources (time). Without permission from the GRA, it is not permitted to use GRA property privately, or to purchase goods and services for private use.

5. Reports

1. In the event of (suspected) misconduct within the meaning of the *Wet bescherming klokkenluiders* (Whistleblower's protection act), an employee or student may report the misconduct through the GRA's Whistleblowing Regulation.
2. A report can be made anonymously, through the confidential advisor or otherwise. Anonymous reporting may limit the (possibilities for) follow-up on the report.
3. If a report has been made or a complaint has been made about conduct which the GRA suspects is or may be a criminal offence, the GRA may decide to carry out a further investigation (or have one carried out) or to make a report to the police and to the confidential inspector of the *Inspectie voor het hoger onderwijs* (Inspectorate of Higher Education), in accordance with an obligation arising from the WHW or any other legal obligation. Any (suspected) offence will be reported to the Executive Board or - if it concerns a matter that concerns (members of) the Executive Board - the Supervisory Board.

Additional provisions, for employees only

6. Dealing with privacy and data protection

1. Employees process personal data of data subjects, such as employees, students, course participants, guest lecturers, alumni, visitors, suppliers, relations and other persons, in accordance with applicable privacy laws and regulations, including at least the General Data Protection Regulation and the *Uitvoeringswet Algemene Verordening Gegevensbescherming* (General Data Protection Regulation Implementation Act), and the applicable internal guidelines and procedures. This means, among other things, that employees:
a. access, store, share (internally and externally) and otherwise process personal data only when necessary for a legitimate purpose of the GRA;
b. retrieve personal data only if it is actually needed for that legitimate purpose;
c. share personal data with persons or organizations (internal or external) only if they actually need that data for that legitimate purpose and the sharing is authorized and permitted by law;
d. not retain personal data longer than necessary;
e. report a (possible) data breach immediately to the head of ICT; and
f. only use equipment, software and other tools and services authorized by the GRA when handling personal data (e.g. employees do not enter personal data into unauthorized AI tools).

2. To the extent that personal data also qualifies as confidential information, the obligations in Article 3 apply in addition to the obligations in this article.

7. Providing and accepting gifts and gratuities

1. The main rule is that an employee shall not give or accept gifts or gratuities by virtue of his or her position with a value of (expected) more than €50, or if they are sent to the home address of the person concerned. In addition, the following rules apply:
a. gifts and gratuities are never provided or accepted in exchange for a quid pro quo;
b. gifts and gratuities will never be provided or accepted while situations of consultation or negotiation are ongoing;
c. gifts and gratuities that cannot be accepted will be reported to the head of department. These will be returned to the provider in consultation, as far as possible.

2. When in doubt as to whether providing or accepting a gift or gratuity is acceptable, the employee shall consult with the head of department.

8. Excursions, work visits, study trips, conferences and events

1. The basic principle for employees to participate in or invite persons to excursions, work visits, study trips, conferences and (other) events is that they must be functional and in the interest of the GRA. In addition, the following rules apply:
a. If an event is not in all respects in the interest of the GRA, then, as a rule, it can only be participated in if several persons or bodies have been invited and publicity is guaranteed.
b. Invitations for excursions, work visits, study trips, conferences and events will be accepted or provided only if they are reasonable and with the prior consent of the head of department; they will never be accepted or provided in exchange for consideration.
c. Participation in or invitations to persons for field trips, work visits, study trips, conferences and events will generally be avoided while situations of consultation or negotiation are ongoing, unless the participation is in the best interest of the GRA and the participation does not affect the independent position of the negotiator(s). In that case, prior approval of the head of department is required.
d. The costs of participation in excursions, work visits, study trips, conferences and events shall, as a rule, be borne by the GRA, subject to applicable rules.
e. If the employee receives an allowance, gift or donation for participation in excursions, work visits, study tips, conferences or events, the provisions of Article 7 shall apply mutatis mutandis.

2. When in doubt whether it is acceptable to participate or to invite a person, the employee shall consult with the head of department.

9. Lunches, dinners and receptions

1. The basic principle for employees to participate in or invite persons to lunches, dinners and receptions is that they must be functional. In addition, the following rules apply:
a. Invitations will be accepted or provided only if they are reasonable; they will never be accepted or provided in exchange for consideration.
b. Whenever possible, there should be reciprocity.
c. Participation in or invitation of persons to lunches, dinners and receptions shall generally be avoided while situations of consultation or negotiation are ongoing, unless participation is in the best

interest of the GRA and participation does not affect the independent position of the negotiator(s). In that case, prior approval of the head of department is required.

2. When in doubt whether it is acceptable to participate or to invite a person, the employee shall consult with the head of department.

10. Conflict of interests and favouritism

1. In the functional actions of the employee, the interest of the GRA is paramount, even if that interest is not in line with the personal interest of the employee. In the event of an (apparent) possible conflict of interest, a decision may be made not to charge the employee in question with the activities that cause the conflict of interest. The following principles apply:
a. Employees shall refrain from any interference that results in their personal involvement in supplies, contracts or services for the benefit of the GRA. If an employee is personally involved in the aforementioned activities, this involvement can only be continued if it does not harm the interests of the GRA and the head of department consents to the employee's involvement.
b. As a rule, employees will not participate in situations of consultation or negotiation involving family members or friends and will not allow situations to arise that could give the impression of deliberate favouritism of family members or friends.
c. In the event that the hiring of external parties involves a long-standing (professional) relationship between the hiring party and the external party, a second person, being a member of the MT, must give prior approval.

11. Ancillary activities

1. The starting point for employees with respect to the performance of ancillary activities is that the employee communicates about them transparently. Activities as referred to in article E-4 (ancillary activities) of the CAO and ancillary activities related to the activities performed for the GRA must therefore be reported to the head of department, or - in the case of (a member of) the Executive Board - the Supervisory Board. In addition, the following rules apply:
a. Ancillary activities may not conflict with Article 10.
b. It is not permitted to perform ancillary activities if these are demonstrably harmful to the GRA. Harm as referred to in the previous sentence may be both material and immaterial. If this is the case, these ancillary activities must be terminated. If this is not complied with, the GRA may decide to terminate the contractual relationship with the employee. Termination is also possible if it is found that an employee has wrongfully and with apparent intentionality failed to

report an ancillary activity and this activity causes damage to the GRA.
c. Reimbursements from third parties for outside activities performed during working hours shall be remitted to the GRA, unless this requirement is waived in writing.
d. A note will be made of outside activities which are reported by employees, which is included in the employee's file. Employees who no longer perform previously reported ancillary activities may request the GRA to undo the recording referred to in the previous sentence.

12. Final Provisions

1. The Code of Integrity shall take effect as of the 23th June, 2025 and shall replace the provisions related to integrity in force until then.

2. In cases not covered by this Code of Integrity, the Executive Board or - if the matter concerns (members of) the Executive Board - the Supervisory Board will decide.