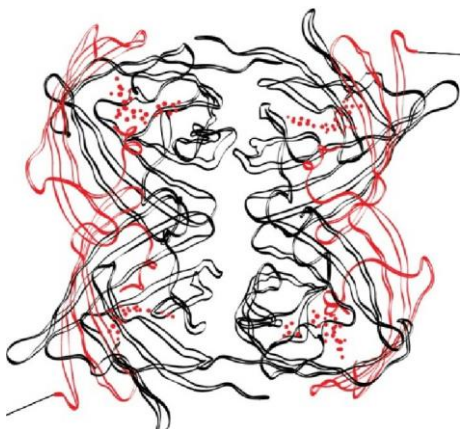
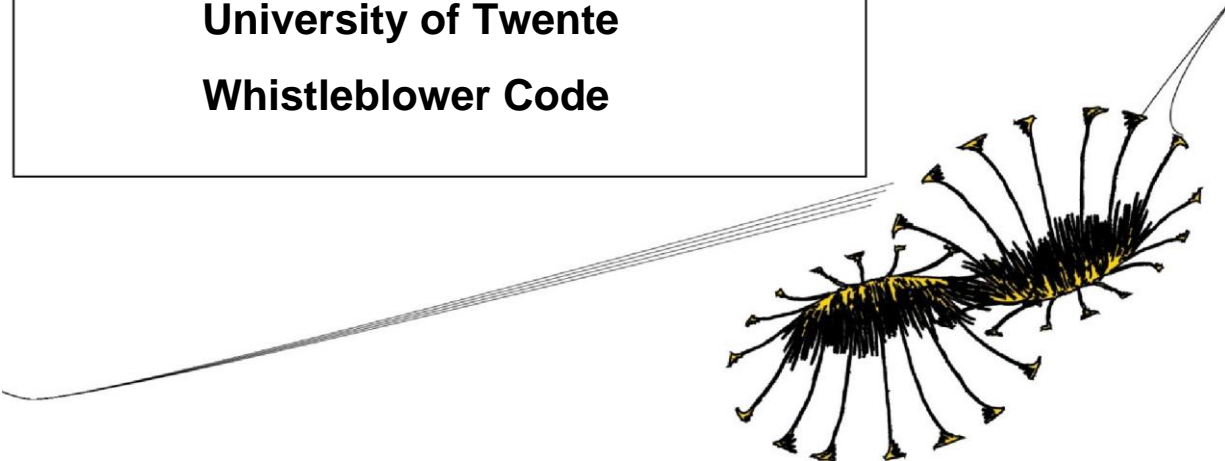
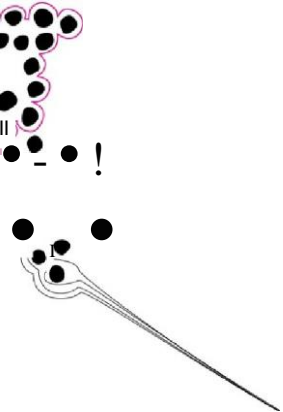


**University of Twente
Whistleblower Code**



FOREWORD

Dear Reporting Person,

We all contribute to teaching and research at the University of Twente on a daily basis, everyone in their own way – from attending classes to teaching and all the preparatory work entailed, conducting research and managing the organisation. We set great store by a pleasant, safe work and study environment.

Part and parcel of a safe work and study environment is the ability to report any suspected wrongdoing or information concerning breaches. This requires a meticulous procedure, whereby anyone thinking of filing a report is protected and therefore feels safe to file that report.

To make this possible we need a Whistleblower Code. Not only do we as a university consider this important, it is also a statutory requirement. The House for Whistleblowers Act has been in force since 1 July 2016. Pursuant to this Act, the University of Twente, as an employer, must establish an internal procedure for dealing with reports of suspected social injustice or irregularities within the organisation or information concerning a breach. The purpose of the Code is to guarantee the legal protection of whistleblowers, while also helping to combat social injustice or breaches of Union law, and the University is keen to make its contribution.

The University of Twente Whistleblower Code is set out in detail in this document. The purpose of the Whistleblower Code is to provide you with a guide to dealing with suspected wrongdoing or breaches of Union law and a clear, safe procedure that safeguards the interests of the reporting person and the accused party.

The Executive Board of the University of Twente has established the following Whistleblower Code, based on the House for Whistleblowers Act. This code replaces the 'Code for Reporting Irregularities at the University of Twente', and applies with effect from 4 October 2021.

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Section 1 General provisions

Article 1.1 Definitions

1. The terms used in this Code should be interpreted as follows:
 - a. *Competent authorities*:
 - The Dutch Authority for Consumers and Markets (ACM) in the case of violations of consumer law
 - The Netherlands Authority for the Financial Markets (AFM) in the case of violations of financial and economic rules
 - The Dutch Data Protection Authority (AP) in the case of violations of the General Data Protection Regulation (GDPR)
 - De Nederlandsche Bank N.V. (DNB) in the case of violations of financial and economic rules
 - The House for Whistleblowers
 - The Health and Youth Care Inspectorate (IGJ) in the case of violations of rules relating to care and young people
 - The Dutch Healthcare Authority (NZa) in the case of violations of rules relating to care.
 - b. *Third party involved*:
 - A third party who has a connection with a reporting person and could be disadvantaged by the reporting person's employer or a person or organisation with whom/which the reporting person otherwise has a connection in a work-related context
 - A legal entity that is owned by the reporting person, for which the reporting person works or with which the reporting person otherwise has a work-related connection.
 - c. *The University*: the University of Twente
 - d. *The Executive Board*: the Executive Board (EB) of the University of Twente
 - e. *The Supervisory Board*: the Supervisory Board of the University of Twente
 - f. *Breach of Union law*: an act or omission that:
 - is unlawful and relates to Union acts and policy areas that fall within the material scope referred to in Article 2 of Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 (OJEU 2019, L 305)
 - g. *Information concerning a breach*: information relating to a reporting person's suspicion that, in the organisation in which the reporting person works or has worked, or in another organisation with which the reporting person has come into contact through working with that organisation, there is a breach of Union law, a danger of a breach, or an attempt to conceal such a breach, insofar as the suspicion is based on reasonable grounds arising from the knowledge that the reporting person has obtained through working at another company or organisation
 - h. *Whistleblowing Officer*: independent officer to whom the reporting person can report suspected wrongdoing or information concerning a breach
 - i. *Complaints Desk*: The desk where students may file formal complaints, formal appeals or formal objections and inquire about the entity to which they should address reports, including reports of suspected wrongdoing. The Complaints Desk will direct them towards the appropriate student manager and/or the Confidential Advisor for Abuses.
 - j. *Act*: the House for Whistleblowers Act

- k. *Code*: this Whistleblower Code
 - l. *Report*: a report of information concerning a breach or suspected abuse under this Code
 - m. *Reporting person*: a natural person who, in the context of work-related activities:
 - *reports or discloses information obtained on a breach, or*
 - *reports or discloses suspected wrongdoing.*
 - n. *Confidential Advisor for Abuses*: the external – i.e. not currently or previously employed by the University of Twente – confidential advisor who has been designated by the Executive Board as such after being interviewed by the University Council
 - o. *University of Twente Abuses Committee*: the Committee entrusted by the Executive Board with investigating the report, as stated in Article 3.1 of this Code
 - p. *Suspicion of/suspected wrongdoing*: a reporting person’s suspicion that there is wrongdoing at the University, insofar as:
 - the suspicion is based on reasonable grounds arising from the knowledge that the reporting person has gained at the University, or arising from the knowledge that the reporting person has obtained through their work for another company or organisation, and
 - in that context there is wrongdoing if the interests of society are jeopardised or there is danger of violation of:
 1. a statutory provision, including a criminal offence or threat thereof;
 2. a danger to public health;
 3. a danger to the safety of persons;
 4. a danger of environmental degradation;
 5. a danger to the proper functioning of the organisation as a result of improper and dishonest action or omission other than a Breach of Union law;
 6. a violation of rules other than a statutory provision;
 7. a waste of public money;
 8. a violation of the scientific (or other) integrity provisions in force at the University, as established in the University of Twente Codes of Conduct, which can be consulted at: <https://www.utwente.nl/organisatie/over-de-ut/integriteit/gedragscodes/>;
 9. the deliberate withholding, destruction or manipulation of information concerning the offences referred to in points 1 to 8.
 - q. *House for Whistleblowers*: the House for Whistleblowers as referred to in Section 3 of the Act
 - r. *Work-related context*: future, current or previous work-related activities in the public or private sector as a result of which, regardless of the nature of those activities, persons could obtain information concerning breaches of Union law or wrongdoing and whereby those persons could be disadvantaged if they were to report such information.
2. Suspected wrongdoing is to be understood as not including the following in any case:
- an individual labour dispute or individual study dispute;
 - an individual violation of the scientific integrity that is subject to the University of Twente Scientific Integrity Complaints Procedure.

Article 1.2 Information, advice and support by the Confidential Advisor for Abuses

1. Within the framework of this Code, the Executive Board shall designate one or more external Confidential Advisors for Abuses.
2. The duties of the Confidential Advisor for Abuses shall be as follows:

- a. to assist reporting persons who suspect wrongdoing or have information concerning a breach, and provide them with advice and support;
 - b. to inform reporting persons about the various paths available for resolving problems or reporting suspected wrongdoing of information concerning a breach;
 - c. to refer reporting persons, as needed, to experts in the field of the suspected wrongdoing or information concerning a breach;
 - d. to act as a point of contact, in order to avoid detrimental consequences for reporting persons.
3. Reporting persons who suspect wrongdoing or have information concerning a breach may consult an advisor in confidence. This could be the Confidential Advisor for Abuses or other advisors who are bound by a duty of confidentiality due to their positions – e.g. lawyers, occupational health physicians, union legal assistance providers, student counsellors, the University’s Ombuds Officer, the Confidential Advisor for Scientific Integrity or the advisory department of the House for Whistleblowers, (to which a Third party involved may also apply) –and other authorities designated as competent.

Article 1.3 Legal protection for reporting persons and other persons involved

1. During and after the processing of a report or disclosure of suspected wrongdoing or information concerning a breach, a reporting person shall not be disadvantaged in any way as a result, whether directly or indirectly, with regard to their legal or other status, unless they have not acted in good faith. Being disadvantaged as a result of a report should be interpreted broadly. This includes e.g. a suspension decision, in any form, or dismissal, termination of or failure to renew a temporary employment contract before its expiry if such renewal would have been expected, failure to promote to a higher position or salary scale, passing over for promotion, transfer to a different position, rejecting a leave application, changing the workplace unnecessarily, and similar forms of intimidation or bullying at the workplace or in the study environment.
2. If a reporting person is disadvantaged during or after the processing of a report to the employer, a competent authority or a management body, service department or other competent body, or after the disclosure of suspected wrongdoing or information concerning a breach, the disadvantage shall be presumed to be the consequence of the report or disclosure.
3. Paragraphs 1 and 2 of this Article apply mutatis mutandis to a person assisting a reporting person and a third party involved.
4. The Executive Board shall ensure, as far as possible, that the reporting person is not disadvantaged in any other way in the performance of their position or in the pursuit of their studies as a result of a report filed in good faith and in accordance with this Code.
5. The Executive Board shall also ensure, as far as possible, that the persons involved in the processing of a report, including the Confidential Advisor for Abuses, will not be disadvantaged in any way in their legal status or otherwise in the performance of their position as a result of making statements in good faith or performing duties described in this Code.
6. If a reporting person is disadvantaged as a result of the report, the Executive Board must justify that this decision has no connection with the report filed in good faith.
7. The University may be subject to an investigation by the House for Whistleblowers, as referred to in the Act, into the manner in which the University has treated the person reporting suspected work-related wrongdoing of importance to society or information concerning a breach.

Article 1.4 Confidential treatment of the report and the identity of the reporting person

a. Anyone involved in the handling of a report of suspected wrongdoing or information concerning a breach shall not disclose the identity of the reporting person without that person's express consent and shall treat the information on the report as strictly confidential. This means that anyone who is aware of, or ought reasonably to surmise, the confidential nature of information is required to keep that information confidential, except insofar as any statutory provision requires it to be disclosed or the need for it to be disclosed arises from that person's duties in implementing the Act. This information shall not be used for any purposes other than a possible external report or other proceedings, legal or otherwise.

Information of a confidential nature in any event includes:

- a. information concerning the identity of the reporting person and the person to whom the abuse or the breach of Union law is imputed or with whom that person is linked and information that can be traced back to that person, and
 - b. information concerning a trade secret.
- b. If the suspected wrongdoing or information concerning a breach has been reported through the Confidential Advisor for Abuses and the reporting person has not given permission for their own identity to be disclosed, all correspondence regarding the report shall be sent to the Confidential Advisor for Abuses, and that Confidential Advisor shall forward it without delay to the reporting person.
 - c. If any statutory provision requires disclosure of a reporting person's identity within the framework of investigation by a competent authority or court proceedings, the reporting person shall be notified in advance, unless that information could jeopardise the related investigation or court proceedings.
 - d. In the case of notification as referred to in subsection c of this Article, the reporting person or person involved shall be sent a written explanation of the reasons for disclosing their identity.
 - e. The Whistleblowing Officer, or where the provisions of Article 2.1(4) of this Code apply the chair of the Committee, shall ensure that the information concerning the report is stored in such a way as to be accessible physically and digitally solely to those persons involved in a report in accordance with this Code.
 - f. A competent authority receiving information on trade secrets shall only use or disclose that information insofar as is necessary for the proper follow-up of the report.
 - g. The Whistleblowing Officer, or where the provisions of Article 2.1(4) of this Code apply the chair of the Committee, shall register a report of wrongdoing or information concerning a breach on receipt thereof in a register set up for the purpose. The information on a report in the register shall be destroyed if they are no longer needed to meet the requirements under the Act or other requirements laid down by or pursuant to Dutch or Union law. A report filed by telephone or other voice messaging system shall also be registered. This can be done by:
 - making a recording of the call in a permanent, retrievable form, for which the prior consent of the reporting person is required, or
 - making a full, accurate transcript of the call, giving the reporting person the opportunity to check, correct and sign the transcript of the call.

Section 2 Internal reporting and procedure

Article 2.1 Internal reporting

1. A reporting person intending to file an internal report is advised to first contact the Confidential Advisor for Abuses, as referred to in Article 1.2, for information, advice or support. The Confidential Advisor for Abuses shall ensure that the reporting person is properly informed and supported.
2. The Confidential Advisor for Abuses may support and advise the reporting person on the path through which the report could be filed. In principle, a reporting person who suspects wrongdoing or has information concerning a breach is advised to make an internal report first for the sake of efficiency.
3. A reporting person who suspects wrongdoing or has information concerning a breach may report it to the Whistleblowing Officer.
4. Notwithstanding the provisions of paragraph 3, the reporting person may report suspected wrongdoing or information concerning a breach directly to the chair of the Committee referred to in Section 3 of this Code, if justified by compelling reasons and/or in the event of a situation as defined in Article 2.5(4).
5. Notwithstanding paragraphs 1-4 of this Article, the reporting person may file an external report of suspected wrongdoing or information concerning a breach directly.

Article 2.2 Internal reporting procedure

1. A report may be filed verbally at the reporting person's request within a reasonable period by means of an interview at a location, or in writing by mail or email, through the Confidential Advisor for Abuses or otherwise. In the case of a verbal report, the recipient of the report as referred to in this Code shall ensure that a transcript is made and shall submit the transcript to the reporting person for approval and signing. The transcript shall contain:
 - a. a clear description of the wrongdoing or the breach of Union law, and
 - b. the date and the name and contact information of the reporting person.
2. The recipient of the report shall send confirmation of receipt to the reporting person or the Confidential Advisor for Abuses within seven days of receiving the report. The confirmation of receipt shall contain at least a factual description of the report, the date on which it was received and a copy of the report.
3. The recipient of the report shall inform the reporting person about the risks of detrimental consequences that the reporting person might face, the manner in which these risks can be reduced and what the reporting person can do if they believe that detrimental consequences have occurred.
4. If the report has been filed directly with the chair of the Committee in accordance with the provisions of Article 2.1(4), the chair of the Committee shall ensure that confirmation of receipt is sent to the reporting person and that information is provided to the reporting person concerning the risks of detrimental consequences that the reporting person might face, the manner in which these risks can be reduced and what the reporting person can do if they believe that detrimental consequences have occurred. As a rule, anonymous reports shall not be taken into consideration unless Article 2.3(4) applies.
5. An internal report does not alter the statutory obligation to report a criminal offence.

Article 2.3 Internal reporting through the Confidential Advisor for Abuses

1. Reporting persons who do not wish to make an internal report of suspected wrongdoing or information concerning a breach directly to the Whistleblowing Officer, or where the provisions of Article 2.1(4) apply the chair of the Committee, may ask the Confidential Advisor for Abuses to do so for them or on their behalf.

2. The Confidential Advisor for Abuses shall inform the reporting person about the risks of detrimental consequences that the reporting person might face, the manner in which these risks can be reduced and what the reporting person can do if they believe that detrimental consequences have occurred.
3. The Confidential Advisor for Abuses shall forward the report in accordance with the provisions of Article 2.1.
4. At the request of the reporting person, the report may be filed anonymously through the Confidential Advisor for Abuses, provided that the name, position (if applicable) and contact information of the reporting person are known to the Confidential Advisor for Abuses.
5. If the provisions of paragraph 4 of this Article apply, the recipient of the report shall send the confirmation of receipt referred to in Article 2.2 to the Confidential Advisor for Abuses, who shall forward it to the reporting person. Further correspondence (e.g. questions posed within the framework of the investigation) shall be sent to the Confidential Advisor for Abuses, who will forward them to the reporting person. The reporting person may respond to them anonymously and in writing, after which the Confidential Advisor for Abuses may once again forward them anonymously.

Article 2.4 Launching an internal investigation

1. After receiving the report, the Whistleblowing Officer shall launch an investigation as soon as possible, unless it is clear in advance that:
 - a. the content of the report does not relate to suspected wrongdoing or information concerning a breach, or
 - b. the suspicion is not based on reasonable grounds.
2. If the Whistleblowing Officer decides not to order an investigation, the reporting person or, in the case of Article 2.3(1), the Confidential Advisor for Abuses shall be notified accordingly in writing within two weeks of receiving the report. Such notification shall also include the grounds on which the Whistleblowing Officer has deemed that the suspicion is not based on reasonable grounds or that it is clear in advance that the content of the report is not related to suspected wrongdoing or information concerning a breach. If this period is not feasible, the Whistleblowing Officer shall inform the reporting person accordingly, stating the period within which such notification will be given.
3. The report shall be treated as confidential by all parties involved and throughout all stages of its processing.

Article 2.5 Conducting the internal investigation

1. The Whistleblowing Officer shall charge the Committee referred to in Section 3 of this Code with conducting the investigation.
2. Within a period of eight weeks from the date of the report, the Whistleblowing Officer shall provide the reporting person with information on the assessment and, insofar as applicable, the follow-up of the report.
3. If this position cannot be relayed within eight weeks, the Whistleblowing Officer shall notify the reporting person accordingly, stating the period within which the position can be expected.
4. The reporting person may report the suspicion directly to the chair of the Committee referred to in Section 3 of this Code under the following conditions:
 - the reporting person disagrees with the position of the Whistleblowing Officer;
 - the reporting person has not been notified of a position within the stated period (or periods);
 - the length of the period referred to in paragraph 3 of this Article is excessive, in light of all circumstances.

Section 3 The University of Twente Abuses Committee

Article 3.1 Establishment and duties

1. If, in accordance with Article 2.4 of this Code, a decision is made to conduct an internal investigation, a University of Twente Abuses Committee (hereinafter referred to as 'the Committee') shall be assembled as soon as possible and the investigation shall be entrusted to the University of Twente Abuses Committee.
2. As part of the internal reporting procedure, the Committee shall have the duty to conduct an internal investigation of the suspected wrongdoing or information concerning a breach reported by the reporting person and advise the Executive Board, or if the Executive Board is involved in the report the Supervisory Board, accordingly.

Article 3.2 Composition

1. The Committee shall always be composed of a permanent external chair (who is also a member), two other external members (preferably with experience in investigation) and a permanent secretary. The Committee shall also include the Ombuds Officer and/or the external Confidential Advisor for Abuses, unless the reporting person has already involved and/or consulted these officers with regard to the report. For each report, the Committee shall be composed with care by the external chair and the secretary. The Committee shall designate a deputy chair from amongst its members.
2. In the absence of the chair or another member, or if the chair or another member is directly or indirectly involved in a report to be assessed, the chair or other member shall be replaced by the deputy chair or a deputy member.
3. The permanent independent external chair (or deputy chair) of the Committee shall be appointed by the Executive Board for a term of three years. Reappointment for subsequent three-year terms is possible.
4. The following shall not be eligible for appointment: members/ex-members of the Executive Board, members/ex-members of the Supervisory Board, members/ex-members of the faculty boards and chairs/ex-chairs of departments, directors/former directors of educational and research institutes, directors/former directors of university service departments and staff/former staff of the University.
5. Interim resignation shall take place at the member's own request. Interim dismissal may also take place due to inadequate performance as a member (or deputy member) of the Committee.

Article 3.3 Secretary

The Committee shall be assisted by a permanent independent external secretary, to be appointed by the Executive Board, who must possess sufficient legal knowledge, as well as knowledge relating to integrity and compliance.

Article 3.4 Powers

1. The Committee shall be authorised to gather information from all staff members, students and bodies of the University. It may request the opportunity to inspect all documentation and correspondence that it deems important to the assessment of the report.
2. The Committee may consult experts, whether or not they are affiliated with the University. A report shall be drawn up of any such consultation. The Committee shall in any event ensure that no-one is consulted who may be or has been involved in the suspected abuse or irregularity.
3. The Committee shall compile a file for every report addressed. No information that was provided under confidentiality contained in this file shall be divulged without the consent of those involved in the report.

Article 3.5 Inadmissibility

1. The Committee shall declare the report inadmissible if:
 - a. the report does not concern an incident of wrongdoing or breach of Union law on which the Committee is competent to advise, or the content of the report does not concern a suspicion of wrongdoing or breach of Union law;
 - b. the suspicion is not based on reasonable grounds;
 - c. the reporting person has raised the suspicion internally, as prescribed in Article 2.1, but the reasonable period between the internal report and the determination of a position has not yet expired.
2. A reasonable period, as referred to in paragraph 1(c) of this Article, has expired if:
 - a. the Whistleblowing Officer has given no account of their position to the reporting person within a period of eight weeks from the time of the internal report, unless the reporting person has been notified that the position should not be expected within eight weeks;
 - b. the Whistleblowing Officer has not stated a period, as referred to in Article 2.5(4);
 - c. the period stated by the Whistleblowing Officer, as referred to in Article 2.5(4) has expired without the reporting person being informed of a position; or
 - d. the period stated by the Whistleblowing Officer, as referred to in Article 2.5(4), is unreasonable in light of all circumstances.
3. The Committee shall notify the Whistleblowing Officer and the reporting person that the report is inadmissible, stating reasons.

Article 3.6 The procedure for the internal investigation

1. If an investigation is launched, the Committee shall notify the reporting person and/or the Confidential Advisor for Abuses accordingly. The person or persons to which the report pertains shall also be notified, unless this would make it impossible to conduct a proper investigation.
2. If necessary, the Committee may consult an internal or external expert or request an investigation in accordance with the provisions of Article 3.4(2).
3. When conducting the investigation, the Committee shall in any case hear the reporting person and the person or persons to whom the report pertains, or give them the opportunity in some other way to explain their position with regard to the suspected wrongdoing; other parties may also be heard by the Committee. In this regard, the principle of hearing both sides of the argument shall be respected.
4. The Committee shall decide whether the explanation is to be provided orally or in writing, and whether or not in each other's presence.
5. The Committee shall provide for the written documentation of the hearings and shall submit any such documentation for the approval and signature of the parties who have been heard. The person who has been heard shall be granted a reasonable period within which to respond. A written transcript shall be provided to the person who has been heard. In its investigation report, the Committee shall include any comments that the person who was heard has made about the report of the hearing. If the person who has been heard refuses to sign the report of the hearing, this shall be noted in that report, stating the reasons if necessary.
6. The Committee may request and inspect all documents within the University of Twente that it deems necessary, within reason, in order to conduct its investigation. The reporting person and the person or persons to whom the suspicion of wrongdoing or the information on the breach pertains shall furnish the documents and/or information required in full and truthfully. The Committee shall determine the manner and the term in which the documents and/or information must be provided.
7. The Committee shall prepare a draft recommendation and provide the reporting person and/or the Confidential Advisor for Abuses and the party to whom the report

pertains with the opportunity to comment on it.

8. The mode of investigation, the way in which the investigation is conducted and the results of the investigation shall be documented in a written report, preferably accompanied by a recommendation.
9. If possible, the written report accompanied by a recommendation shall be provided to the Executive Board, or if the Executive Board is involved in the report the Supervisory Board, within eight weeks of the start of the investigation. If additional time is needed, this period may be extended by four weeks. In that case, all parties involved shall be informed about this before the eight-week period has expired.

Article 3.7 Recommendation of the Committee

1. The reporting person and/or the Confidential Advisor for Whistleblowers and the person or persons to whom the report pertains shall receive a copy of the Committee's recommendation, as contained in the report provided to the Executive Board in accordance with the provisions of Article 3.6(9), with due observance of the possible confidential nature of any information provided to the Committee and the relevant regulations.
2. The recommendation shall be made public in an anonymised form, and with due regard for the confidential nature of any information provided to the Committee, including information on the reporting person's identity, and the rules applicable thereto, in a way that the Committee considers appropriate, unless there are compelling reasons not to publicise the recommendation.

Article 3.8 The position of the Executive Board

1. Within two weeks of receiving the recommendation referred to in Article 3.7, the Executive Board, or if the Executive Board is involved the Supervisory Board, shall adopt a position and notify the reporting person and/or the Confidential Advisor for Abuses and the person or persons to whom the report pertains of this position in writing as soon as possible. The consequences of the report shall also be indicated, as well as any measures to be taken.
2. If the Executive Board or Supervisory Board is unable to state its position within the specified period, the Executive Board or Supervisory Board shall notify the reporting person and/or the Confidential Advisor for Abuses accordingly in writing. This notification shall specify the period within which the position can be expected. If, as a result, the total period from the Committee's receipt of the report to the Executive Board's or Supervisory Board's statement of its position exceeds twelve weeks, such notification shall also indicate why a longer period is necessary.

Article 3.9 Annual report of the Committee

1. Each year, an annual report shall be compiled by the secretary of the Committee.
2. The following information shall be given in the report, in anonymised form and with due regard for the relevant applicable regulations:
 - a. the number and nature of the reports of suspected wrongdoing or information concerning a breach,
 - b. the number of reports that did not lead to investigations,
 - c. the number of investigations undertaken by the Committee, and
 - d. the number and nature of the recommendations that it has issued.
3. This annual report shall be sent to the Executive Board. The Executive Board shall send the annual report to the Supervisory Board and to the University Council. The Executive Board shall note the annual report in the report referred to in Article 2.9 of the Higher Education and Scientific Research Act.

Section 4 External reporting

Article 4.1 A direct external report

Although persons are advised to report internally for the sake of efficiency, it is also possible to file an external report directly with the House for Whistleblowers or some other competent authority.

Section 5 Concluding provisions

Article 5.1 Entry into force

This Code enters into force on 4 October 2021 and replaces the preceding University of Twente Regulations on the Reporting of Irregularities.

Article 5.2 Appendices

1. The following appendices have been attached to the Whistleblower Code:
 - Step-by-step Plan for Reporting
 - Reporting Roadmap
2. These appendices are an integral part of the Whistleblower Code.

Contact details for internal reporting

For internal reporting please contact the external confidential advisors for abuses, Margreet van Dongen (email: vertrouwenspersoon.vandongen@gmail.com, phone number: 06 – 12 69 62 37).

Contact information for the House for Whistleblowers

The House for Whistleblowers may refer the employee to the appropriate entity and, in some cases, conduct its own investigation. In addition to the investigations department, the House for Whistleblowers has an advisory department, which advises employees on dealing with wrongdoing. The two departments are strictly separate from each other.

For questions concerning the reporting of wrongdoing, call 088 – 371 30 31.

For questions from employers and other questions, call 088 – 371 30 32 or email kenniscentrum@huisvoorklokkenluiders.nl.

Email

For advice on reporting wrongdoing, contact advies@huisvoorklokkenluiders.nl. For employers and general affairs, contact info@huisvoorklokkenluiders.nl.

Address: Maliebaan 72, 3581 CV Utrecht
<https://huisvoorklokkenluiders.nl/>

Appendix 1 Step-by-step Plan for Reporting



STEP 1: FILE THE REPORT WITH THE:

- Whistleblowing Officer
- Chair of the Committee
- External report



STEP 2: ADMISSIBILITY

- Reasonable grounds?
- Suspected wrongdoing?
- Proper procedure?
- Reasonable periods?



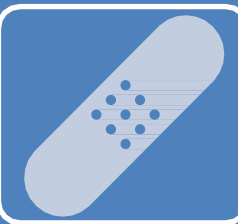
STEP 3: INVESTIGATION BY ABUSES COMMITTEE

- Position on procedure (admissibility and working practice)
- Independent and impartial
- Hearing both sides
- Consultation with experts
- Draft recommendation



STEP 4: RECOMMENDATION OF THE ABUSES COMMITTEE

- Written
- Confidential
- If necessary: anonymous
- Report to the Executive Board



STEP 5: POSITION OF THE EXECUTIVE BOARD

- Measures for mitigating the wrongdoing?
- Satisfactory resolution?



STEP 6: LEGAL MEASURES

- Reporting person: Abuses Committee, if in disagreement with the position on procedure in the case of inadmissibility
- Reporting person: external report to competent authorities
- Reporting person: report to House for Whistleblowers