



## **Sanctions Policy**

Adopted by the Supervisory Board on 07-10-2024

### **1. To whom do the regulations apply**

This policy applies to all employees, volunteers and consultants who work for Free a Girl, both in the Netherlands and abroad. This policy also applies to (employees of) all our partner organizations and others who have a signed a contract with Free a Girl.

### **2. Sanctions for violation of the rules – employees**

If an employee acts contrary to the conditions of the employment contract, Code of Conduct, Anti-Fraud and Corruption Policy or Child Safeguarding Policy, Free a Girl will:

1. Provide written or verbal warning (of which a confirmation is sent to the relevant employee).
2. Make a note in the employees file.
3. Hold the employee accountable for the damage caused (both physical as financial).

The actual sanctions will be dependent on the severity of the violation(s) of the rules and policies.

In case of a breach of the Child Safeguarding policy or the Anti-fraud and Corruption policy, Free a Girl will also:

4. Withhold the employees wage.
5. Put the employee on hold while he/she is under investigation.
6. Discharge the employee with possibility of a legal action such as prosecution.

Again, the actual sanctions will be dependent on the severity of the violation(s) of the rules and policies.

### **3. Sanctions for violation of the rules- external partners**

If a partner organization behaves contrary to the conditions of the employment and or partner contract, Code of Conduct, Anti-Fraud and Corruption Policy, or Child Safeguarding Policy, Free a Girl will:

1. Contact the partner organization, verbally and in writing.
2. Stop payments to the partner organization immediately.
3. Cancel the contract with the partner organization immediately.
4. Call for compensation for loss or damage through legal proceedings.

After corrective action, the relationship with the partner organization can be continued when:

- The damage has been repaired by the partner organization;
- The partner has reported to the police;
- The partner has taken steps to improve the organization internally;
- Persons involved have been suspended or dismissed by the partner organization.

#### **4. Who imposes**

The Director imposes the verbal warning. The written confirmation and sanctions are sent by the HR department to the employee's home address. Where the concern or suspicion is about the Director, the Supervisory Board imposes the verbal warning.

Written contact with the partner organization is made by the Program Manager.

#### **5. Appeal and objection**

If an employee objects to a sanction, he/she can address the HR department in writing within 10 working days. After a fair hearing, a reasoned written decision will be issued within 10 working days after treatment. Treatment does not suspend the sanction.