

## Integrity policy

This document sets out the standards that Stichting (Foundation) Women on Wings and Wings International Pvt Ltd, (hereafter collectively referred to as WoW) consider important for acting with integrity within WoW and in relation to all other parties involved. The aim of the policy is to prevent misconduct and violations as much as possible.

### Types of violations

The integrity system distinguishes between three types of violations:

- Abuse of power: corruption, blackmail, conflict of interest, leaking confidential information, culpable negligence.
- Financial violation: fraud, theft, abuse of goods or services provided, culpable waste.
- Interpersonal violations: discrimination, intimidation, bullying, unwanted sexual advances, violence, humiliation, sexual intimidation, sexual violence.

#### 1. Abuse of power/conflict

"Abuse of power" means the abuse of a position of power in order to harm other people, to bully them or place them at a disadvantage, or in order to procure personal advantages for oneself or one's favorites.

Our Supervisory Board members are selected in such a way that the risk of conflicts of interest is minimal. To make this transparent, we publish the other activities of our Supervisory Board members (work, other management or advisory roles) on our website. Our members are unpaid and only receive compensation for the actual costs they incur in the performance of their board duties. If a declaration for expenses incurred by a member of the supervisory board exceeds 500 euros, it must be initialled by a fellow supervisory board member.

All of our employees and experts have signed a confidentiality agreement in case confidential information is shared with them. If the obtained confidential information has potential repercussions for third parties, the matter will be submitted to the Managing Directors, who decide on any follow-up action.

#### 2. Financial violation

For payment authorities and authorizations, an authorization matrix has been approved by the Supervisory Board. This ensures the separation of duties. It states who is authorized to perform actions (take decisions and sign documents) and make payments, and up to what amount. A second signature is required for payments. The Supervisory Board decides on major changes to the authorization matrix.

WoW handles the resources and goods entrusted to it with care; we do not waste them. WoW

does not accept corruption or blackmail, and does everything possible to prevent them from occurring.

We ask for at least three quotations for an order, project, and work to be outsourced that exceeds €50,000 in total per year and were not in the budget before. In accepting the most favourable quotation costs, sustainability, and quality of the quotation are carefully weighed. Ethnicity, religious belief, and gender of the tenderer are not factors in the award.

### 3. Interpersonal breaches

All of our employees and experts who work within the framework of WoW's objective have been carefully screened. In our travels to India and to our business partners, we conduct ourselves in a professional and respectful manner. We do not accept favours of any kind from people, companies, or organizations that have a direct interest in our presence as persons or in our capacity as representatives of WoW. Professional conduct includes respect for the morals and customs of the local population. Employees and experts sign a 'Code of Conduct'. Our toolkit includes a dress code as well as a code of conduct.

### Notifications

The integrity policy is intended to set a standard for our behavior and give guidelines for situations where great financial, personal, or reputational risks arise.

### Confidential advisor and integrity officer

The confidential advisor and integrity officer is there for people who work at, for and/or with WoW and is a sparring partner for anyone considering filing a report; this can be anyone who is (or has been) confronted with inappropriate behaviour and/or an integrity issue within or by WoW. Any person who wants to file a report can talk freely with the confidential advisor; everything that person says will be kept completely confidential. The confidential advisor offers support and assistance in finding solutions. The confidential advisor is trained to perform this role and guides and advises anyone considering making a report and during any subsequent process. Confidential advisor - contact details:

Christiane van den Berg: [C.vandenberg@onzevertrouwenspersoon.nl](mailto:C.vandenberg@onzevertrouwenspersoon.nl) Tel.: +31 (0) 6-19665693

### Reporting

Reporters who act in accordance with this policy can make their report without jeopardising their employment or other position at WoW.

In the event of one or more of the aforementioned violations or suspicion thereof, persons who are involved with WoW in any way are entitled to file a report to WoW. A point of contact to report violations or suspected violations must be easily contactable and confidential. A violation or suspected violation can be reported to WoW in various ways. An important starting point is

that the person making the report should always be involved in the follow-up process after the initial contact. The person making the report may request that their identity not be disclosed. The anonymity of the person making the report is thus guaranteed until the point of contact to report is legally obliged to disclose the name. In that case, the WoW managing directors or a Supervisory Board member shall inform the person making the report before the name of the person making the report is disclosed.

The ways in which a report can be made are:

1. To the managing directors. This concerns both anonymous reports and non-anonymous reports.
  - Shilpa Mittal Singh, [shilpa@womenonwings.com](mailto:shilpa@womenonwings.com)
  - Ellen Tacoma, [ellen@womenonwings.com](mailto:ellen@womenonwings.com)
2. To one of the Supervisory Board members:
  - Neelima Khetan [neelimakhetan@gmail.com](mailto:neelimakhetan@gmail.com)

## Internal report

If someone suspects misconduct at WoW or at another organization with which they have come into contact through their work (e.g. at one of the business partners), then this person can report their suspicion. If a report of suspected or other unacceptable behaviour is received, the managing directors will discuss whether or not to proceed with a formal investigation by an external party. In this case, a preliminary investigation takes place (behind the scenes) to determine whether the report is 'worthy of investigation'. The managing directors, the Supervisory Board, and the external party then make a joint decision as to whether to conduct an investigation. If the results of the investigation give cause to take corrective action in accordance with the report of wrongdoing, the managing directors take the final decision. WoW is also alert to possible victims of unacceptable behaviour and will support them where necessary in coming to terms with this.

## External report

If a report is received of suspected or other unacceptable behaviour by one of the business partners, the managing directors will contact the directors of the organization in question with a request to investigate the matter and to share the results with WoW. If such a report is not dealt with properly, the WoW managing directors may decide to review the relationship with the partner in question.

## Complaints procedure

WoW does everything in its power to prevent misconduct and complaints. If there are any complaints (verbal or via email), WoW will take them seriously and respond appropriately.

## The promotion of ethical behaviour

WoW attaches great importance to acting with integrity and promotes ethical behaviour in the following and more ways:

- Introduction of the integrity policy
- Inclusion of the integrity policy in the toolkit for experts
- Annual discussion of the functioning of the integrity policy during the expert meetings
- Report on violations in the annual report and report to the CBF

## Accountability

If a violation of integrity has taken place, the annual report must mention the following: the number and nature of reports/violations and how they are addressed, as well as the reflection on the integrity policy.

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