



BRILL

Code of Conduct - English Version

Leiden, 5/30/2013

1. **General Provisions**

Koninklijke Brill NV [Royal Brill NV] (hereinafter to be referred to as 'Brill') is an academic publishing company that operates internationally. Brill's publications are of a high academic standard and are primarily aimed at scholars and other academics. To Brill, its reputation as an academic publishing company is of vital importance and great value. This means that all Brill staff in their capacity as employees are required to conduct themselves in such a manner that their conduct does not damage the reputation and standing of Brill.

2. **Risk Management**

The Management Board pursues a policy that aims at carrying out business activities within a framework that provides for adequate risk management. This means that occurrences and acts (including mistakes made) that may substantially affect Brill's activities, results, or both, and that have been noted by a member of staff, must be reported to the next-highest level of authority (hereinafter to be referred to as 'the manager'). It is not possible to adequately define all occurrences and acts of this kind. Therefore one of the guidelines that may be applied is that reporting is necessary if without such notification the manager would be surprised if he were to become aware of the occurrence or act concerned (early warning principle).

3. **Financial Data**

Occurrences and acts as defined in Clause 2 above may have consequences for the company's financial reports and the company results. The company has to report on all financial issues to the outside world on the basis of the financial data submitted by the organisation. It is essential that this report is correct, and everyone who is involved in providing information for the financial report must ensure that the financial data submitted by him are correct. If there is a risk that data will or may not be included or processed correctly, these data must be accompanied by an explanation.

4. **Personal Conduct Staff**

(Including the managing director) in their capacity as employees must conduct themselves in such a manner that they will not disadvantage the company and will not benefit themselves at the expense of the company. More specifically, this means that:

- a. if there is a conflict of interest, or a potential conflict of interest, the employee concerned must leave decisions to the manager (for the managing director: the chair of the Supervisory Board)



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- b. giving gifts to third parties is only allowed if this is commercially and legally responsible. A statement of expenses must be submitted in respect of gifts other than books published by the company or gifts given on the occasion of meetings organised by the company. In those cases gifts must be recorded according to company policies.
- c. accepting gifts with a value of more than € 100 is not allowed. If the value is hard to determine employees are expected to use common sense as much as possible. A guideline in this respect may be to consider what colleagues would think if they heard that someone had accepted such a gift. The acceptance of gifts, regardless of the value of the gift or gifts, must always be reported to the manager (for the managing director: to the chair of the Supervisory Board)
- d. offering or accepting bribes is never allowed.

5. **Rules of Conduct**

Relating to suspected irregularities (whistleblower) The company has a whistleblower policy. Employees can use the whistleblower regulations subject to the terms provided therein, without jeopardizing their legal position.

6. **Company Rules**

The Koninklijke Brill NV Company Rules provide how employees should behave towards one another in their daily interactions in the workplace. This also relates to all unacceptable behaviour such as discriminations, sexual harassment, etc.

‘She’ may be read for ‘he’ wherever it occurs.