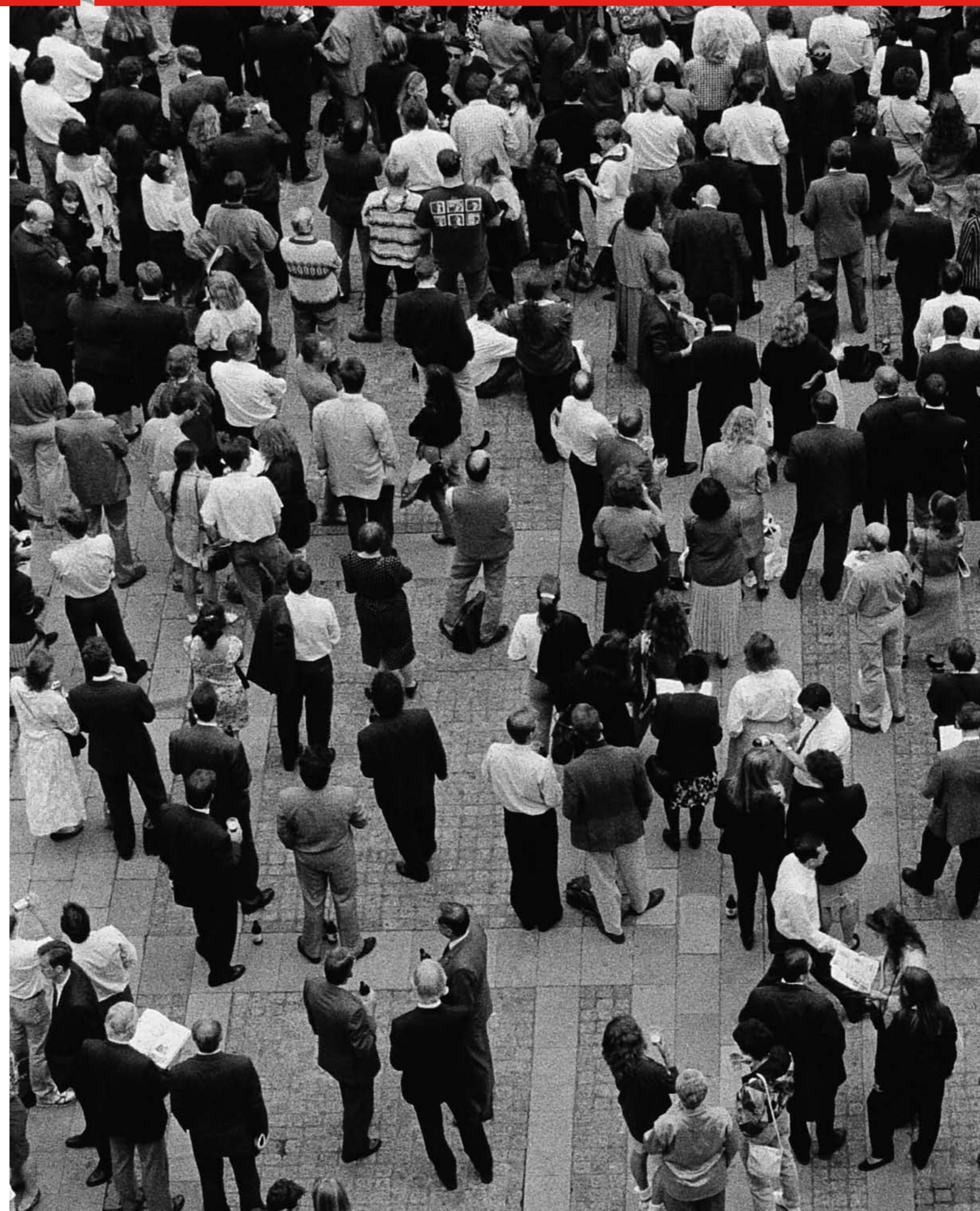


Confidential Advisory Committee Regulations

The Confidential Advisory Committee Regulations apply to staff of or working for:

- > Koninklijke Wegener NV
- > Wegener Nederland BV
- > Wegener NieuwsMedia BV
 - Brabants Dagblad
 - Eindhovens Dagblad
 - De Twentsche Courant Tubantia
 - De Gelderlander
 - de Stentor
 - BN/DeStem | PZC
 - Uitgeverij BN/DeStem BV
 - Uitgeverij Provinciale Zeeuwse Courant BV
- > Wegener Huis-aan-huisMedia BV
- > Wegener NieuwsDruk BV (staf)
 - Wegener NieuwsDruk Best
 - Wegener NieuwsDruk Gelderland
 - Wegener NieuwsDruk Twente
 - Wegener NieuwsDruk Nijmegen
 - Wegener NieuwsDruk Brabant
 - Wegener NieuwsDruk West
- > Wegener ICT | Media BV
- > Wegener Facilitair Bedrijf BV
- > Wegener MediaVentions BV



Article 1

Definitions

The definitions below apply solely to these Confidential Advisory Committee Regulations:

The company: Koninklijke Wegener NV or one of its Dutch subsidiaries or business units to which these regulations have been declared applicable.

Executive: Those who, acting jointly or alone as managing directors, exercise the highest level of control in the management of work in the relevant company, subsidiary, business unit or concern staff department.

Staff member: A person working for the company under an employment contract – not including members of the Koninklijke Wegener NV's Board of Directors and people reporting directly to Koninklijke Wegener NV's Board of Directors – and anyone working for the company under a temporary employment contract, secondment contract, apprenticeship contract or work placement contract.

The complainant:

Any staff member or other person who works for the company other than under an employment contract, such as trainees, temporary workers, seconded employees, etc., who files a complaint with due observance of the provisions of these regulations.

The accused: The person or persons against whom an internal or external complaint is lodged,

Confidential adviser:

A person appointed by the executive in consultation with the works council, who, upon request, is the first point of contact and helps decide whether or not to lodge a complaint.

Article 2

Objective of the regulations

The objective of the Confidential Advisory Committee Regulations is to ensure a fair handling of complaints received from individual employees of Koninklijke Wegener NV or any of its subsidiaries, in such a way as to safeguard any reasonably required protection of their interests.

The executives declare that inappropriate and offensive behaviour towards employees will not be tolerated. Anyone who believes they have been the target of such behaviour may apply to the Confidential Advisory Committee, which will safeguard everyone's privacy. Measures will be

taken against anyone culpable of discrimination, sexual harassment, badgering, aggression and/or violence.

Anyone, including the complainant, witnessing or taking cognisance of such behaviour is encouraged to call the person displaying the behaviour to account or have a manager do so.

If this does not produce the desired result or if the complainant is unable to call the other person to account or does not want the other person to be called to account, the complainant may submit a complaint to the Confidential Advisory Committee.

The executives encourage everyone to discuss the feelings of discontent or grievance referred to in Article 3, paragraph 1 informally with their manager first.

Before lodging a complaint, the complainant can apply to the confidential adviser of the company in question to attempt to find a solution to the complaint.

Article 3

The term 'complaint'

1. In these regulations, 'complaint' means any feeling of discontent or grievance expressed by complainants if they feel they have been the target of discrimination, sexual harassment, badgering, aggression and/or violence.
2. Discrimination is when a direct or indirect distinction is made on the basis of race, gender, nationality, religion or personal philosophy, sexual orientation or civil status. It involves verbal, non-verbal and physical conduct, including:
 - a. suggestive comments and judgemental statements about the complainant's race, gender, nationality, religion or personal philosophy, sexual orientation and/or civil status;
 - b. jokes with a racist slant;
 - c. words of abuse or nicknames that refer to the above characteristics or imperfections in appearance.
3. Sexual harassment is when a person displays unwanted attention with a sexual undertone, advances and conduct that the complainant finds unpleasant and which are unilateral, unwanted and/or forced upon the complainant, including:
 - a. suggestive comments;
 - b. boasting about sexual performance or making smutty jokes;
 - c. unnecessary physical contact or blocking the way;
 - d. unwanted written contact;
 - e. pin-up posters;
 - f. assault and rape.

4. Badgering is when the complainant is repeatedly hurt or tormented in situations directly related to the performance of work.
5. Aggression/violence is when a complainant is harassed psychologically and/or physically, in situations directly related to the performance of work.
6. A complaint within the meaning of these regulations does not concern complaints that must be handled and settled in accordance with the Regulations governing the right of complaint.

Article 4

Assistance

1. The complainant and the accused may call in the assistance of a confidential adviser.
2. The complainant must work for a company for which a Confidential Advisory Committee has been established; the confidential adviser does not have to be employed by a company for which a local works council has been appointed.
3. If the Confidential Advisory Committee considers the complaint justified, it will – if the complainant appreciates it – help the complainant find and, if necessary, contact organisations that provide social, psychological and/or physical assistance to victims of discrimination, sexual harassment, badgering, aggression and/or violence.

Article 5

The Confidential Advisory Committee

1. A Confidential Advisory Committee is established for each company or group of companies for which a works council has been appointed. A Confidential Advisory Committee will also be established in the absence of a works council. In that event, the works council's duties will be taken over by or on behalf of the executive committee of the central works council.
2. A Confidential Advisory Committee consists of:
 - a. the head of the personnel & organisation department;
 - b. the company medical officer;
 - c. the company social worker (if there is one);
 - d. a member of the management team to be appointed by the executive;
 - e. the chairperson of the works council (or a member designated by the works council).
3. The members of the Confidential Advisory Committee referred to in 5.2.d and 5.2.e normally resign after four years and will be immediately re-eligible for appointment. Their term of office is equal to that of the works council.
4. For the members of the Confidential Advisory Committee referred to in 5.2.d and 5.2.e, an appropriate substitute member will be appointed.

5. If the members of the Confidential Advisory Committee referred to in 5.2.d and 5.2.e are personally involved in the complaint, they will be replaced by their substitute members.
6. If a member of the Confidential Advisory Committee referred to in 5.2.a, b. or c. is personally involved in the matter, CP&O will arrange an appropriate substitute for the committee members involved.
7. The Confidential Advisory Committee will appoint a chairperson and a secretary from its number.

Article 6

Lodging a complaint

1. Complaints are to be lodged in writing within two months after the incident of discrimination, sexual harassment, badgering, aggression and/or violence with the secretary of the Confidential Advisory Committee established for the company where the complainant is employed, unless the nature of the complaint is such that a longer term is justified, to be decided at the discretion of the Confidential Advisory Committee.
2. A complaint must:
 - a. describe the incident of discrimination, sexual harassment, badgering, aggression and/or violence;
 - b. state the name/names of the accused;
 - c. state the name of any confidential adviser.

Article 7

Handling by Confidential Advisory Committee

1. The secretary of the Confidential Advisory Committee immediately confirms receipt of the complaint in writing, stating the date of receipt.
2. The Confidential Advisory Committee will inform the complainant in writing whether it considers itself competent to handle the complaint within ten working days after receipt of the complaint.
3. If the Confidential Advisory Committee considers itself competent to handle the complaint, its secretary will immediately send a copy of the complaint to the accused and give the accused the opportunity to inspect the written documents submitted to the Confidential Advisory Committee.
4. If the accused responds to the complaint in writing, the secretary will forward a copy of it to the complainant.
5. If the Confidential Advisory Committee believes that the complaint calls for immediate measures, it may recommend specific measures to the executive but not until complainants have given their opinion about the measure.
6. In handling the complaint, the Confidential Advisory Committee will hear all parties, which will in any event include the following, in the order given:
 - a. the complainant and his/her confidential adviser;
 - b. the person accused of the alleged impropriety and his/her confidential adviser;
 - c. the personnel officer in question or, if this officer is involved in the complaint, the head of P&O. If the Grafimedia Collective Bargaining Agreement applies to the complainant, the Confidential Advisory Committee may also solicit the advice of the Sexual Harassment Taskforce established in the graphics sector by the Central Bureau.

7. The Confidential Advisory Committee is authorised to call people other than the complainant to hearings or to make a statement.
8. Written records are kept of each hearing, which the people heard must sign as correct and may provide with their comments.
9. Witnesses who wish to remain anonymous on account of potential threats by any of the parties may submit a request for protection of the data concerning their identity to the Confidential Advisory Committee. If the request is granted, the witness will be heard at a separate hearing and the accused will be granted access to the written testimony.
10. The Confidential Advisory Committee will inform the complainant and the accused in writing of its position and the reasons for it within thirty working days after receipt of the complaint. The executive is provided with a recommendation based on this position. The Confidential Advisory Committee may recommend a measure or sanction ranging from a reprimand to dismissal.
11. Contrary to the provisions of Article 7.10, if an executive or head of a concern staff department is accused of discrimination, sexual harassment, badgering, aggression and/or violence, the Confidential Advisory Committee will submit its recommendation to the Board of Directors.
12. If the complainant withdraws the complaint at any stage of the procedure, the Confidential Advisory Committee will stop handling it.

Article 8

Standards for assessing a complaint

The Confidential Advisory Committee is entitled to gather all information that it deems necessary in order to arrive at a conclusion. This information may only be withheld on the grounds that disclosure of this information would harm the privacy of any third parties.

Article 9

Meetings of the Confidential Advisory Committee

1. The Confidential Advisory Committee will meet as frequently as is required for a proper handling of any complaints lodged or whenever two of its members request a meeting.

2. The secretary of the Confidential Advisory Committee is responsible for convening the Confidential Advisory Committee meeting, drawing up the agenda and sending out the meeting documents to the committee members.
3. A meeting of the Confidential Advisory Committee must be attended by all members or substitute members.
4. The Confidential Advisory Committee decides by a majority of votes. Each member is entitled to cast one vote.
5. The meetings of the committee are not public.

Article 10

Executive's decision

1. The executive will take a decision as soon as possible, in any event within ten working days after receipt of the Confidential Advisory Committee's recommendation, and inform the complainant, the accused and the Confidential Advisory Committee in writing of the decision and the reasons for it.
2. If any of the parties involved in the complaint cannot resign itself to the decision, this party may lodge a written objection with the executive within thirty working days. The executive will then take a decision within thirty working days. The executive will consult with the P&O staff director and check with the chairperson of the Confidential Advisory Committee.

Article 11

Confidentiality

1. The members and substitute members of the Confidential Advisory Committee will observe confidentiality with regard to everything of which they take cognisance when handling a complaint.
2. The people consulted by the Confidential Advisory Committee and those who have provided information will also observe confidentiality. This obligation to observe confidentiality is expressly pointed out to them.
3. The decisions of the Confidential Advisory Committee may only be disclosed to third parties with the written permission of the complainant and the executive involved. The requirement of both parties' permission does not apply in the event of legal proceedings.

Article 12

Protection

1. The inclusion of any data relating to the lodging or handling of a complaint in a staff member's personnel file is not permitted. This prohibition does not apply to documents that were already included in the staff member's personnel file before the complaint was lodged or documents normally included in personnel files.
2. The Confidential Advisory Committee will ensure, together with any manager, that the complainant will not experience any adverse effects from lodging a complaint.

3. The executive will ensure that the staff member is not disadvantaged on account of lodging a complaint.
4. The same applies to members and substitute members of the Complaints Committee, the confidential adviser, and anyone involved in handling a complaint.
5. The inclusion of any data other than the original complaint and the executive's decision relating to the lodging or handling of a complaint in a staff member's personnel file is not permitted. This prohibition does not apply to documents that were already included in the staff member's personnel file before the complaint was lodged or documents normally included in personnel files.

Article 13

Archive

1. All documents collected by the Confidential Advisory Committee in handling a complaint are kept in the committee's archive in the medical officer's office for three years.
2. If the medical officer is replaced, the departing medical officer is responsible for the proper transfer of the files.
3. The complainant, the accused and the chairperson of the Confidential Advisory Committee will be notified in advance when the documents are destroyed. At the request of the complainant or the accused, the documents will be kept for another two years at most.

Article 14

Report to the works council and executive

1. The respective Confidential Advisory Committees report annually, before 1 April, to the works council in question and the executive in question about the efficacy of the Confidential Advisory Committee Regulations in the past calendar year.
2. The – confidential – report will list the complaints handled by the Confidential Advisory Committee. The information provided will be limited to the nature of the complaint, a concise account of the Confidential Advisory Committee's position and recommendation and a concise account of the executive's decision.
3. In response to the Confidential Advisory Committee's report, the executive reports to the Board of Directors by means of a summary of the Confidential Advisory Committee's report.

Article 15

Unforeseen circumstances

In the event of any circumstances not provided for by these regulations, the Board of Directors of Koninklijke Wegener NV will decide following consultation with the central works council.

Article 16

Amendment

Any required amendment to the regulations requires prior consent of the central works council.

Article 17

Effective date

These regulations came into effect on 1 October 1988 and were last amended on 12 May 2005.