

REGULATIONS GOVERNING THE RIGHT OF COMPLAINT

Article 1

Definitions

The definitions below apply solely to these Regulations Governing the Right of Complaint:

- 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.
- Complainant:** Any staff member who files a complaint with due observance of the provisions of these regulations.
- Management:** The complainant's immediate manager and all higher supervisory staff.
Confidential adviser: An internal or external person appointed by the complainant to assist and support the complainant.

Article 2

Objective of the right of complaint

The objective of the right of complaint is to ensure a fair, sound and effective 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.

Article 3

The term 'complaint'

- In these regulations, 'complaint' means any feeling of discontent or grievance expressed by staff members if – given their work situation or their performance in the organisation – they feel that they have been treated unfairly or that a measure taken by management or a situation in the organisation contravenes the standing employment regulations, their employment contract or a custom or common practice, and adversely affects their terms of employment and/or position.

- A complaint does not qualify as a complaint within the meaning of these regulations if it pertains to:
 - decisions by the Board of Directors of Koninklijke Wegener NV or the absence of a decision;
 - decisions taken with consent or following advice from the representative consultative meeting;
 - decisions by the editors-in-chief regarding the editorial content of the paper;
 - the nature and content of regulations concerning a group or groups of employees;
 - a topic that the complainant has already submitted to an arbitration committee established under the collective bargaining agreement or to a court, unless the arbitration committee or court declared itself incompetent to give a ruling.
- Complaints regarding discrimination, sexual harassment, badgering, aggression and violence are to be lodged with the confidential advisory committee established by the company where the people involved are employed. This confidential advisory committee is governed by separate regulations.

Article 4

Complaint in the first instance

- Staff members who have a complaint should initially discuss it with their immediate manager.
- If the complaint relates in whole or in large part to a decision or procedure of this manager, the complainant may lodge the complaint with the manager's superior in the first instance.
- This consultation will be geared to resolving the complaint.
- With regard to the complaint, the immediate manager will seek the advice of the relevant personnel officer and/or head of P&O.

Article 5

Complaint in the second instance

- If complainants believe that the consultation with their immediate manager has not yielded a satisfactory solution to their complaint, they can submit their complaint in writing to their immediate manager's superior.
- During this complaint handling phase, the complainant may call in the assistance of a confidential adviser.
- The complaint should in any event specify:
 - which manager took the decision or refrained from doing so;
 - what decision was taken or should have been taken;
 - what the objections are to this decision or the fact that it was not taken;
 - who acts as confidential adviser, if any.



4. The immediate manager's superior immediately confirms receipt of the complaint in writing, stating the date of receipt.
5. In handling the complaint, the immediate manager's superior will seek the advice of:
 - a. the head of P&O or the P&O officer;
 - b. the complainant's immediate manager.
6. In principle, the immediate manager's superior will give a written, substantiated decision within ten working days after receipt of the complaint.
7. If the complaint is not handled or is not handled in a timely fashion or in a manner the complainant deems satisfactory, the complainant may lodge an appeal with the Complaints Committee.

Article 6

The Complaints Committee

1. A Complaints Committee is established for every company or group of companies regardless of whether a works council has been established. If no works council has been established, its duties will be taken over by or on behalf of the executive committee of the central works council.
2. Each Complaints Committee consists of three members.
3. One member is appointed by the executive and one by the works council. These two members will jointly appoint the third member.
4. The Complaints Committee will appoint a chairperson and a secretary from its number.
5. A substitute member is appointed for each member, in the same manner as stated in paragraph 3.
6. The members and substitute members of the Complaints Committee normally resign after four years, but are immediately re-eligible for appointment. The term of office is equal to that of the works council. If there is no works council, the term of office of the central works office will apply.
7. The members and substitute members of the Complaints Committee must be employed by the companies for which the Complaints Committee has been established.
8. If members of the Complaints Committee are personally involved in the complaint, they will be replaced by their substitute members.

Article 7

Handling by the Complaints Committee

1. The complaint is to be lodged in writing with the secretary of the Complaints Committee appointed for the company where the complainant is employed within ten working days after the date of the decision by the immediate manager's superior.

2. The complaint should in any event specify:
 - a. which manager took the decision or refrained from doing so;
 - b. what decision was taken or should have been taken;
 - c. what the objections are to this decision or the fact that it was not taken;
 - d. the decision taken by the immediate manager's superior;
 - e. who acts as confidential adviser, if any.
3. The secretary of the Complaints Committee immediately confirms receipt of the complaint in writing, stating the date of receipt.
4. The Complaints 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.
5. In handling the complaint, the Complaints 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 personnel officer in question;
 - c. the complainant's immediate manager;
 - d. the immediate manager's superior;
 - e. any fellow staff members against whom the complaint is lodged.
6. The Complaints Committee will inform the complainant 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.
7. If the complainant withdraws the complaint at any stage of this procedure, the Complaints Committee will decide whether the complaint is to be regarded as settled.

Article 8

Standards for assessing a complaint

1. When presented with a complaint, the Complaints Committee will in any event ascertain whether:
 - a. pursuant to Article 3 the contested decision or complaint is governed by these regulations;
 - b. the person taking the decision was authorised to do so;
 - c. the contested decision contravenes the terms of employment applicable to the complainant, the policy adopted or a common practice;
 - d. the contested decision is to be considered reasonable, that is – taking the relevant circumstances into account – whether the complainant's interests have not been unnecessarily harmed;
 - e. the contested decision was carefully prepared and taken in accordance with the appropriate procedure;

f. the procedure applicable under these regulations was observed when the complaint was lodged and being handled.

2. The Complaints 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 Complaints Committee

1. The Complaints 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 Complaints Committee is responsible for convening the Complaints Committee meeting, drawing up the agenda and sending out the meeting documents to the committee members. The date on which the committee is to meet will be set in consultation with the management of the departments in which the committee members in question are employed.
3. A meeting of the Complaints Committee must be attended by all members or substitute members.
4. The Complaints Committee decides by a majority of votes. Each member is entitled to cast one vote.
5. The meetings of the committee and the associated meeting documents are not public.

Article 10

The contested decision during handling

1. Lodging a complaint will neither reverse nor suspend the contested decision. The decision will remain effective until it is suspended, reversed or amended by the person who took the decision or the executive.
2. The executive may decide to suspend the staff member against whom a complaint has been lodged for the period during which the complaint is being handled or to take other measures on account of the complaint or another justifiable reason.
3. The executive may also decide, even if the complaint handling procedure has not yet been completed, to take legal measures (including dismissal) against the staff member against whom the complaint has been lodged.

Article 11

Executive's decision

The executive will take a decision as soon as possible, in any event within ten working days after receipt of the recommendation from the Complaints Committee, and inform the complainant, the Complaints Committee, the complainant's immediate manager, the immediate

manager's superior and P&O in writing of the decision and the reasons for it.

Article 12

Confidentiality

1. The members and substitute members of the Complaints Committee will observe confidentiality with regard to everything of which they take cognisance when handling a complaint.
2. The people consulted by the Complaints 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 Complaints Committee may only be disclosed to third parties with the written permission of the employee, the employee's immediate manager, the immediate manager's superior and the executive involved. The requirement of all parties' permission does not apply in the event of legal proceedings.

Article 13

Protection

1. The executive will ensure that the staff member is not disadvantaged on account of lodging a complaint.
2. The same applies to members and substitute members of the Complaints Committee, the confidential adviser, and anyone involved in handling a complaint.
3. 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 14

Archive

1. All documents collected by the Complaints Committee in handling a complaint are kept in the committee's archive in the personnel & organisation department for three years.
2. The complainant, the complainant's immediate manager, the immediate manager's superior and the Complaints Committee will be notified in advance when the documents are destroyed. At the request of the complainant, the complainant's immediate manager or the immediate manager's superior, the documents will be kept for another two years.
3. The original complaint and executive's decision will be filed in the complainant's personnel file.



Article 15

Report to the works council and executive

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

Article 16

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 17

Amendment

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

Article 18

Effective date

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

The Regulations Governing the Right of Complaint apply to staff of or working for:

- > Koninklijke Wegener NV
- > Wegener Nederland BV
- > Wegener NieuwsMedia BV
 - Brabants Dagblad
 - Eindhoven's 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