# Procedure file

Basic information	
COD - Ordinary legislative procedure (ex-codecision 2022/0066(COD) procedure) Directive	Procedure completed
Combating violence against women and domestic violence	
Subject 4.10.04 Gender equality 4.10.09 Women condition and rights 7.30.30.02 Action to combat violence, trafficking in human beings and migrant smuggling Legislative priorities	
Joint Declaration 2022 Joint Declaration 2023-24	

# Key players

European Parliament	Joint Committee Responsible           LIBE         Women?s Rights and Gender Equality	Rapporteur Appoin 09/08/2	2022
	Civil Liberties, Justice and Home Affairs	09/08/2 FITZGERALD Frances	2022
		S&D INCIR Evin Shadow rapporteur	
		COLIN-OESTERLÉ Nathalie	
		RODRÍGUEZ RAMOS María Soraya	
		NICHOLSONOVÁ Lucia	
		RIBA I GINER Diana	
		DE LA PISA CARRIÓN Margarita	
		KANKO Assita	
		ANDERSON Christine	

	FEMM Women?s Rights and Gender Equality	FEST Nicolaus   BJÖRK Malin   RODRÍGUEZ PALOP   Eugenia	
	Civil Liberties, Justice and Home Affairs Committee for opinion BUDG Budgets	Rapporteur for opinion	Appointed 27/04/2022
	Employment and Social Affairs         (Associated committee)         IMCO         Internal Market and Consumer Protection	ESTARÀS FERRAGUT         Rosa         The committee decided not to	08/09/2022
	JURI Legal Affairs	give an opinion.	13/07/2022
	Committee for opinion on the legal basis	Rapporteur for opinion	Appointed 01/07/2023
Council of the European Union European Commission	Commission DG Justice and Consumers	Commissioner DALLI Helena	

Key events			
09/03/2022	Legislative proposal published	COM(2022)0105	Summary
23/03/2022	Committee referral announced in Parliament, 1st reading		
07/07/2022	Referral to associated committees announced in Parliament		
07/07/2022	Referral to joint committee announced in Parliament		
28/06/2023	Vote in committee, 1st reading		
28/06/2023	Committee decision to open interinstitutional negotiations with report adopted in committee		
06/07/2023	Committee report tabled for plenary, 1st	A9-0234/2023	Summary

	reading		
10/07/2023	Committee decision to enter into interinstitutional negotiations announced in plenary (Rule 71)		
12/07/2023	Committee decision to enter into interinstitutional negotiations confirmed by plenary (Rule 71)		
15/02/2024	Approval in committee of the text agreed at 1st reading interinstitutional negotiations	PE759.029 GEDA/A/(2024)000988	
23/04/2024	Debate in Parliament	<b>1</b>	
24/04/2024	Results of vote in Parliament	<u>A</u>	
24/04/2024	Decision by Parliament, 1st reading	<u>T9-0338/2024</u>	Summary
07/05/2024	Act adopted by Council after Parliament's 1st reading		
14/05/2024	Final act signed		
24/05/2024	Final act published in Official Journal		

# Technical information

Procedure reference	2022/0066(COD)
Procedure type	COD - Ordinary legislative procedure (ex-codecision procedure)
Procedure subtype	Legislation
Legislative instrument	Directive
Legal basis	Rules of Procedure EP 57_o; Rules of Procedure EP 41; Treaty on the Functioning of the EU TFEU 083-p1-a1; Rules of Procedure EP 59; Treaty on the Functioning of the EU TFEU 082-p2
Stage reached in procedure	Procedure completed
Committee dossier	CJ01/9/09545

# Documentation gateway

Document attached to the procedure	SEC(2022)0150	09/03/2022	EC	
Document attached to the procedure	SWD(2022)0060	09/03/2022	EC	
Document attached to the procedure	SWD(2022)0061	09/03/2022	EC	
Document attached to the procedure	SWD(2022)0062	09/03/2022	EC	
Document attached to the procedure	SWD(2022)0063	09/03/2022	EC	
Legislative proposal	COM(2022)0105	09/03/2022	EC	Summary
Economic and Social Committee: opinion, report	CES1395/2022	13/07/2022	ESC	
Committee draft report	PE739.730	13/12/2022	EP	
Amendments tabled in committee	PE740.668	02/02/2023	EP	
Amendments tabled in committee	PE742.348	02/02/2023	EP	
Amendments tabled in committee	PE742.349	02/02/2023	EP	

Amendments tabled in committee		PE742.350	02/02/2023	EP	
Amendments tabled in committee		PE742.352	02/02/2023	EP	
Committee opinion	BUDG	PE739.787	02/03/2023	EP	
Committee opinion	JURI	PE734.177	28/03/2023	EP	
Committee opinion	EMPL	PE737.239	05/05/2023	EP	
Specific opinion	JURI	PE750.144	27/06/2023	EP	
Committee report tabled for plenary, 1st reading/single reading		<u>A9-0234/2023</u>	06/07/2023	EP	Summary
Coreper letter confirming interinstitutional agreement		GEDA/A/(2024)000988	14/02/2024	CSL	
Text agreed during interinstitutional negotiations		<u>PE759.029</u>	14/02/2024	EP	
Text adopted by Parliament, 1st reading/single reading		<u>T9-0338/2024</u>	24/04/2024	EP	Summary
Draft final act		00033/2024/LEX	14/05/2024	CSL	
Commission response to text adopted in plenary		<u>SP(2024)394</u>	08/08/2024	EC	

### Additional information

Research document

25/09/2023

Final act	
Directive 2024/1385 OJ OJ L 24.05.2024	

# Combating violence against women and domestic violence

Briefing

PURPOSE: to provide a comprehensive framework for effectively combating violence against women and domestic violence throughout the Union.

PROPOSED ACT: Directive of the European Parliament and of the Council.

ROLE OF THE EUROPEAN PARLIAMENT: the European Parliament decides in accordance with the ordinary legislative procedure and on an equal footing with the Council.

BACKGROUND: violence against women and domestic violence are criminal offences, violations of human rights and various forms of discrimination. Combating such violence is part of the European Commission's action to protect the fundamental values of the Union and to ensure compliance with the Charter of Fundamental Rights of the European Union.

Violence against women and domestic violence are pervasive throughout the EU and are estimated to affect 1 in 3 women in the EU. In terms of more specific types of violence, in 2014, one in ten women reported being sexually assaulted and one in twenty women reported being raped. More than one in 5 women experienced domestic violence. By 2020, an estimated one in 2 young women have experienced gender-based cyber-violence. Cyber-violence particularly affects women who are active in public life, such as female politicians or journalists, or human rights defenders.

Women also experience violence at work: about a third of women in the EU who have faced sexual harassment experienced it at work.

The European Parliament has repeatedly asked the Commission to propose legislation on violence against women and domestic violence, as well as on gender-based cyber-violence. Parliament has also adopted two legislative initiative reports calling on the Commission to (i) bring forward proposals on combating gender-based violence and cyber-violence respectively and (ii) the addition of gender-based violence as a new area of crime listed in Article 83(1) TFEU [(see 2020/2035(INL) and 2021/2035 (INL)].

CONTENT: the proposal for a Directive aims to prevent and combat violence against women and domestic violence in order to ensure a high level of safety and full enjoyment of fundamental rights within the Union, including the right to equal treatment and non-discrimination between women and men. To this end, measures are proposed in the following areas

(1) Criminalisation of the relevant offences and penalties for such offences

The proposal aims to criminalise certain forms of violence that disproportionately affect women, which are insufficiently addressed at national level and which fall within the competence of the EU, on the basis of existing legal bases. This concerns the criminalisation of rape on the basis of lack of consent (without the necessary use of force or threats, as is the case in some Member States), female genital mutilation, and certain offences related to computer crime: non-consensual sharing of intimate or manipulated material, online stalking, cyberstalking and incitement to violence or hatred online.

The proposal defines the minimum level of maximum penalties for the offences concerned. Member States should thus ensure that rape is punishable by a maximum penalty of at least eight years' imprisonment, and at least ten years' imprisonment if the offence was committed under aggravating circumstances.

(2) Victim protection and access to justice

The proposal:

- contains rules on the reporting of violence against women and domestic violence to ensure that these offences are prosecuted;

- ensures that offences are effectively investigated and prosecuted, that sufficient expertise and resources are available and that offences amounting to rape are prosecuted ex officio;

- provide for an individual needs assessment for protection and support tailored to the specific needs of victims of violence against women or domestic violence;

- provide for specific safeguards for child victims of violence against women or domestic violence;

- ensure protection through emergency barring and protection orders;

- ensure that victims can effectively claim compensation from the offender;

- ensure the removal of online content in relation to offences of cyber violence, and a possibility of judicial redress for the affected users; and

- ensures that government bodies exist to assist, advise and to represent victims in court proceedings in matters of violence against women or domestic violence.

#### (3) Victim support

The proposal includes specific support in cases of sexual violence and female genital mutilation, access to national helplines, improved access to shelters and comprehensive support for victims of sexual harassment at work. Targeted support for victims with specific needs and groups at risk, including women fleeing armed conflict, is also planned.

#### (4) Prevention

The proposal includes an obligation to carry out awareness-raising activities. It provides that professionals who are most likely to come into contact with victims should receive targeted training and information and that intervention programmes should be open, on a voluntary basis, to those who fear that they would commit such crimes.

#### (5) Coordination and cooperation

The proposal strengthens coordination and cooperation at national and EU level, ensuring a multi-agency approach and strengthening data collection on violence against women and domestic violence.

#### Budgetary impact

The European Institute for Gender Equality (the EIGE) would need the following financial and human resources to be able to carry out the administrative data collection: (i) one-off set-up cost: EUR 200 000; (ii) annual maintenance and running costs: EUR 750 000; (iii) staff: one temporary agent (full-time equivalent) from 2025 onwards and two contractual agents (full-time equivalent) from 2025 onwards (i.e. a three in total).

# Combating violence against women and domestic violence

The Committee on Civil Liberties, Justice and Home Affairs and the Committee on Womens Rights and Gender Equality adopted the report presented by Frances FITZGERALD (EPP, IE) and Evin INCIR (S&D, SE) on the proposal for a directive of the European Parliament and of the Council on combating violence against women and domestic violence.

The relevant committees recommended that the European Parliaments position adopted at first reading in the ordinary legislative procedure should amend the proposal as follows:

The proposed Directive lays down rules to prevent and combat violence against women and domestic violence. It should establish minimum rules on the rights of victims to protection and support, as well as prevention and early intervention.

The Directive should take into account the increased risk of violence faced by victims of intersectional discrimination based on both sex and gender. Member States should ensure that, in the application of this Directive, particular attention is paid to the risk of intimidation, retaliation, secondary and repeat victimisation and to the need to protect the dignity and rights of victims, including their physical and psychological integrity, privacy and safety.

#### Criminal conduct

According to Members, the directive should apply to criminal conduct which amounts to violence against women or domestic violence, as criminalised under Union or national law. This includes the criminal offences defined in this Directive, namely rape, sexual assault, female genital mutilation, intersex genital mutilation, forced sterilisation, forced marriage, sexual harassment in the world of work, the non-consensual sharing of intimate or manipulated material, cyber stalking, cyber harassment, the unsolicited receipt of sexually explicit material, cyber incitement to violence or hatred and criminal conduct covered by other Union instruments,

#### Concept of consent

Members proposed broadening the definition of rape to include all other acts of non-consensual sexual nature. Non-consensual act means an act performed without the womans consent given voluntarily or where the woman is unable to form a free will due to her physical or mental condition, thereby exploiting her incapacity to form a free will, such as in a state of fear, intimidation, unconsciousness, intoxication, sleep, illness, bodily injury or disability or in an otherwise particularly vulnerable situation.

It is emphasised that consent can be withdrawn at any moment during the act. The absence of consent cannot be refuted by the womans silence, verbal or physical non-resistance or past sexual conduct or existing or past relationship with the offender including marital or any other partnership status.

#### Sanctions

Members believe that sexual assault should carry a maximum penalty of at least three years in prison and at least five years if the offence was committed under aggravating circumstances. Sexual harassment offences in the workplace should carry a maximum penalty of at least one year in prison.

#### Aggravating circumstances

Members expanded the list of aggravating circumstances. This should include situations where:

- the offence was committed against a person made vulnerable by special circumstances, such as residency status, pregnancy, dependency, physical, mental, intellectual or sensory distress or disability, a person who is a victim of trafficking or living in an institution including retirement homes, childrens homes, reception centres, detention or accommodation centres for asylum seekers;

- the offence was committed against a public representative, journalist or human rights defender;

- the intent of the crime was to preserve or restore the honour of a person, family, community;

- the crime was intended to punish victims for their sexual orientation, gender expression or identity, sexual characteristics, skin colour, religion, social origin or political beliefs.

#### Protection of victims

Victims should have access to legal aid and assistance, free of charge and in a language they can reasonably understand, when reporting criminal offences and during judicial proceedings. The competent authorities should take all necessary steps to ensure that all evidence is obtained as soon as possible. Member States should ensure that victims are referred to a specialised contact person within the competent authority irrespective of whether a criminal complaint is filed.

Members stressed the importance of always recognising as victims children who have witnessed violence against women and domestic violence and suggested specific improvements to ensure that the best interests of the child are duly taken into account. To this end, Member States should ensure that professionals specialising in the care and support of children are present in order to assist them in reporting procedures.

#### Investigations and court proceedings

Competent authorities should promptly and effectively record and investigate allegations of violence against women or domestic violence and ensure that an administrative record is kept in all cases and that evidence is preserved, whether or not the investigation proceeds. Victims should be informed of the importance of collecting evidence at the earliest possible time.

#### Specialised individual assessment to identify victims' needs

The specialised individual assessment should be initiated without delay upon the first contact of the victim with the competent authorities and should be carried out by professionals with expertise in this area. Circumstances requiring special attention should include the fact that the victim is pregnant, the victims dependence on or relationship to the offender, the risk of the victim returning to the offender or suspect, recent separation from an offender or suspect, the possible risk that children and companion animals are used to exercise control over the victim and the risks for victims with disabilities.

#### Emergency barring, restraining and protection orders, arrest and detention

Members proposed enhanced measures to ensure the safety of victims during the process, stressing the need for barring, restraining and protection orders as well as arrests and detention as a way of protecting womens safety and obtaining evidence. Member State authorities should also make greater efforts to secure evidence, both online and offline, as early as possible, and electronic monitoring, such as ankle bracelets, should be used to make sure that barring, restraining and protection orders are respected, and can be followed up upon.

Lastly, Member States should facilitate the tasks of a Union coordinator on combating gender-based violence, responsible for improving coordination between Union institutions, bodies, offices and agencies, Member States and international actors, and the coherence of the actions they take in the fight against violence against women and domestic violence.

# Combating violence against women and domestic violence

The European Parliament adopted by 522 votes to 27, with 72 abstentions, a legislative resolution on the proposal for a directive of the European Parliament and of the Council on combating violence against women and domestic violence.

The European Parliaments position adopted at first reading under the ordinary legislative procedure amends the proposal as follows:

Offences concerning sexual exploitation of women and children and computer crime

Member States should ensure that the following intentional conduct is punishable as a criminal offence and where such conduct is likely to cause the person to seriously fear for his or her own safety or the safety of dependants:

- female genital mutilation;

#### - forcing an adult or a child to enter into a marriage;

- making accessible to the public, by means of information and communication technologies (ICT), images, videos or similar material depicting sexually explicit activities or the intimate parts of a person, without that persons consent;

- cyber harassment: (i) repeatedly or continuously engaging in threatening conduct directed at a person, at least where such conduct involves threats to commit criminal offences; (ii) the unsolicited sending, by means of ICT, of an image, video or other similar material depicting genitals to a person, where such conduct is likely to cause serious psychological harm to that person; (iii) making accessible to the public, by means of ICT, material containing the personal data of a person, without that persons consent, for the purpose of inciting other persons to cause physical or serious psychological harm to that person.

The new text sets out an extended list of aggravating circumstances for offences punishable by harsher penalties, such as crimes against public figures, journalists or human rights defenders. The list also includes the intention to punish victims for their gender, sexual orientation, skin colour, religion, social origin or political beliefs, as well as the desire to preserve or restore honour.

#### Protection of victims

In addition to the rights of victims when making a complaint, Member States should ensure that victims can report acts of violence against women or domestic violence to the competent authorities through accessible, easy-to-use, safe and readily available channels. That should include, at least for the cybercrimes, the possibility of reporting online or through other accessible and secure ICT.

Member States should ensure that, where the victim is a child, professionals subject to confidentiality obligations under national law are able to report to the competent authorities where they have reasonable grounds to believe that serious physical harm has been inflicted on the child as a result of violence against women or domestic violence. Member States should ensure that professionals trained to work with children assist in reporting procedures to ensure that they are in the best interests of the child.

#### Investigation and prosecution

Where the competent authorities have reasonable grounds to suspect that a criminal offence might have been committed, they should, without undue delay, effectively investigate, upon receipt of a complaint or on their own initiative, acts of violence against women or domestic violence. They should ensure that an official record is filed and preserve a record of relevant findings and evidence in accordance with national law.

At the earliest possible stage, such as at the time of first coming into contact with the competent authorities or as soon as possible after first coming into contact with them, the victims specific protection needs should be identified by means of an individual assessment, where appropriate in collaboration with all relevant competent authorities. Where the assessments identify specific support or protection needs or where the victim requests support, Member States should ensure that support services, such as specialist support services, in cooperation with the competent authorities, contact victims to offer support, with due regard for their safety.

#### Support for victims

Member States should ensure that specialised support services are available to victims whether or not they have lodged a formal complaint.

With regard to victims of sexual violence, Member States should (i) set up rape or sexual violence crisis centres to provide effective support to victims of sexual violence and clinical management in cases of rape; (ii) ensure that victims of sexual violence have access to medical and forensic examinations; (iii) provide timely access to health care services, including sexual and reproductive health care services.

The shelters and other appropriate interim accommodation should specifically address the needs of victims of domestic violence and sexual violence, including those of victims at an increased risk of violence. They should assist victims in their recovery by providing safe, easily accessible, adequate and appropriate living conditions with a view to a return to independent living and by providing information on support services and referrals, including for further medical care.

#### Promoting the central role of consent in sexual relationships

Member States should take appropriate measures to promote changes in behavioural patterns rooted in the historically unequal power relations between women and men or based on stereotyped roles for women and men, in particular in the context of sexual relationships, sex and consent.

These measures include awareness-raising campaigns or programmes aimed in particular to increase knowledge of the fact that non-consensual sex is considered a criminal offence.

Member States should promote or offer training to healthcare professionals, social services and educational staff likely to come into contact with victims in order to enable them to identify instances of violence against women or domestic violence and to direct victims to specialist support services.

#### Reporting and review

By eight years from the date of entry into force of this Directive, Member States should communicate to the Commission all relevant information concerning the functioning of this Directive necessary for the Commission to draw up a report on the evaluation of this Directive. On the basis of the information provided by Member States, the Commission should carry out an evaluation of the scope of this Directive and the introduction of new offences is necessary. That report should be accompanied by a legislative proposal, if necessary.

# Combating violence against women and domestic violence

PURPOSE: to prevent and combat violence against women and domestic violence across the Union on the basis of common minimum rules.

LEGISLATIVE ACT: Directive (EU) 2024/1385 of the European Parliament and of the Council on combating violence against women and domestic violence.

CONTENT: this directive lays down rules to prevent and combat violence against women and domestic violence. It establishes minimum rules concerning:

- the definition of criminal offences and penalties in the areas of sexual exploitation of women and children and computer crime;

- the rights of victims of all forms of violence against women or domestic violence before, during and for an appropriate time after criminal proceedings;

- protection and support for victims, prevention and early intervention.

Offences concerning sexual exploitation of women and children and computer crime

The directive criminalises the following offences across the EU: female genital mutilation, forced marriage, non-consensual sharing of intimate images, cyber stalking, cyber harassment and cyber incitement to hatred or violence.

Committing these crimes will be punishable by prison sentences ranging from at least one to five years.

The new legislation sets out an extended list of aggravating circumstances for offences punishable by harsher penalties, such as crimes against public figures, journalists or human rights defenders. The list also includes the intention to punish victims for their gender, sexual orientation, skin colour, religion, social origin or political beliefs, as well as the desire to preserve or restore honour.

#### Protection of victims

The directive contains detailed rules on the measures of assistance and protection that Member States should provide to victims.

Member States must, inter alia:

- ensure that victims can report acts of violence against women or domestic violence to the competent authorities through accessible, easy-to-use, secure and readily available channels. This includes, at least for cybercrime, the possibility of filing a complaint online;

- put in place measures to ensure that children receive professional assistance. Where children report acts of violence against women to the competent authorities, Member States should ensure that reporting procedures are safe, confidential, accessible, secure and accessible to children, and that they are accessible to adults. Where they report a crime committed by a holder of parental authority, the authorities should take measures to protect the safety of the child before informing the alleged perpetrator;

- ensure that victims have access to specialised support services, whether or not they have made a formal complaint (e.g. information on access to housing, education, childcare, training, financial assistance and help to keep or find a job; information on access to legal advice, including the possibility of legal aid, on services providing medical and forensic examinations and on women's support services);

- set up adequately equipped and easily accessible rape and sexual violence crisis centres to provide effective support to victims of sexual violence and to ensure clinical management in cases of rape, including assistance with the preservation and documentation of evidence;

- ensure that nationwide helplines are available free of charge, 24 hours a day, seven days a week, to provide information and advice to victims.

In order to protect a victim's privacy and to avoid repeat victimisation, Member States should also ensure that the use of evidence concerning the victim's past sexual behaviour is allowed in criminal proceedings only where relevant and necessary.

Member States should also ensure that a child receives adequate specific support as soon as the competent authorities have reasonable grounds to believe that the child may have suffered or witnessed violence against women or domestic violence.

#### Investigation and prosecution

Where the competent authorities have reasonable grounds to suspect that a criminal offence might have been committed, they should, without undue delay, effectively investigate, upon receipt of a complaint or on their own initiative, acts of violence against women or domestic violence. They should ensure that an official record is filed and preserve a record of relevant findings and evidence in accordance with national law.

At the earliest possible stage, such as at the time of first coming into contact with the competent authorities, the victims specific protection needs should be identified by means of an individual assessment. The individual assessment should focus on the risk emanating from the offender or suspect.

#### Shelters and other appropriate interim accommodation

The shelters and other appropriate interim accommodation should specifically address the needs of victims of domestic violence and sexual violence, including those of victims at an increased risk of violence. They should assist victims in their recovery by providing safe, easily accessible, adequate and appropriate living conditions with a view to a return to independent living and by providing information on support services and referrals, including for further medical care.

#### Preventive measures

Member States should take appropriate measures to prevent violence against women and domestic violence by adopting a comprehensive multi-level approach. Preventive measures aim to raise awareness of the root causes of violence against women and domestic violence, and to highlight the central role of consent in sexual relationships.

#### ENTRY INTO FORCE: 13.6.2024.

#### TRANSPOSITION: no later than 14.6.2027.

Transparency				
INCIR Evin	Rapporteur	LIBE	08/03/2024	Sigtuna kvinnojour
INCIR Evin	Rapporteur	LIBE	04/03/2024	Svenska kvinnors Europa nätverk
INCIR Evin	Rapporteur	LIBE	31/01/2024	Ledamot av Frankrikes

				nationalförsamling
PICIERNO Pina	Shadow rapporteur	LIBE	23/01/2024	Confederazione Nazionale Coldiretti Confederazione dell'Industria Manifatturiera Italiana e dell'Impresa Privata European agri-cooperatives Le Contemporanee
FITZGERALD Frances	Rapporteur	FEMM	22/01/2024	Bumble Inc. Flint Europe
INCIR Evin	Rapporteur	LIBE	19/01/2024	European Women's Lobby
INCIR Evin	Rapporteur	LIBE	15/01/2024	Amnesty International Limited
INCIR Evin	Rapporteur	LIBE	15/01/2024	Ledamot av Frankrikes nationalförsamling
COLIN-OESTERLÉ Nathalie	Shadow rapporteur	LIBE	20/12/2023	Bouillons atelier
INCIR Evin	Rapporteur	LIBE	15/12/2023	ETUC
MELCHIOR Karen	Member	14/02/2024	Bumble Inc.	
HIDVÉGHI Balázs	Member	04/12/2023	World Youth Alliance - Europe	
SIPPEL Birgit	Member	28/11/2023	Permanent Represention of the Federal Republic of Germany to the EU	
SIPPEL Birgit	Member	19/10/2023	Permanent Representation of Germany to the EU	
FRANSSEN Cindy	Member	12/10/2023	Vrouw & Maatschappij	
GÁLVEZ Lina	Member	23/05/2023	International Coalition for the Abolition of Surrogate Motherhood	
BJÖRK Malin	Member	09/05/2023	Wave	
SIPPEL Birgit	Member	09/11/2022	Bündnis Nordisches Modell	
LENAERS Jeroen	Member	12/07/2022	ARCTURUS GROUP Attenti	