

SV-ISO PROCEDURE

HR-010a

CODE OF CONDUCT
STICHTING VLUCHTELING



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VLUCHTELING
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*Photo caption front cover:
Woman carrying water on her head, Ethiopia 2023.
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1. INTRODUCTION

Stichting Vluchteling's (SV) main goal to ensure the protection of and assistance to refugees and IDPs goes hand in hand with the upholding and promotion of the highest standards of ethical and professional conduct. This Code of Conduct describes SV's principles and rules of behaviour that guide the decisions, operations and ways of working of SV as an organisation, of all of its employees and of everyone associated with SV, regardless of location.

The main objective of the Code of Conduct is to give employees an insight into the values and principles of SV and give guidelines on how to act as a consequence of these basic rules and how to (re)act when the reality is not compliant with these rules.

Moreover, this Code of Conduct forms the basis of SV's integrity system. It defines the actions and behaviours which will not be tolerated by the organisation, and which may therefore result in disciplinary action or punishment. The proportionality of the disciplinary actions and punishments will always be considered in relation to the severity of the offence. However, SV applies a zero-tolerance policy for all acts of sexual exploitation and abuse or other type of unethical behaviour that will not be tolerated under any circumstances.

The SV Code of Conduct is linked to other SV internal policies and procedures that provide more detailed guidance on elements also covered by the SV Code of Conduct, namely:

- A-006 Fraud and Corruption Prevention Policy.
- HR-001 Labour Regulations.
- HR-002 Whistle-blower Policy of SV.
- FIN-001 Procurement Policy (SV office); and
- P-019 SV Humanitarian Procurement Policy.
- Cd-003 Instructions for Implementing Partners (IPs) regarding reporting of SEA (sexual exploitation and abuse), fraud and other abuse.

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2. OUR VALUES

Integrity

We are open, honest and trustworthy in dealing with beneficiaries, partners, co-workers, donors, funders and the communities we affect.

Accountability

We are accountable—individually and collectively—for our behaviours, actions and results.

Service

We are responsible to the people we serve and the donors who enable our service.

3. OUR GUIDING PRINCIPLES

We endorse the Code of Conduct for the International Red Cross and Red Crescent Movement and NGOs in Disaster Relief. We are guided by its core humanitarian principles, including humanity, impartiality, neutrality, and independence. As such:

- The prime motivation for our response to disaster is to alleviate human suffering amongst the most vulnerable members of society. We recognise our obligation to provide humanitarian assistance wherever it is needed.
- Our aid is given regardless of the race, creed or nationality of the recipient, and without adverse distinction of any kind. Aid priorities are calculated based on need.
- Our aid will not be used to further a particular political or religious standpoint, nor will we tie the promise, delivery, or distribution of assistance to the embracing or acceptance of a particular political or religious creed; and
- We shall endeavour not to act as instruments of government policy. We will never allow ourselves to be used to gather information of a political, military, or economically sensitive nature for governments or other bodies that may serve purposes other than those which are strictly humanitarian.

We also affirm and enforce human rights consistent with the UN Universal Declaration of Human Rights, the Convention on the Rights of the Child, and the UN Secretary General's Bulletin on the Protection from Sexual Exploitation and Abuse of Beneficiaries.

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4. OUR COMMITMENTS

a. Our Commitment to Our Colleagues

SV is committed to ensuring safe and secure conditions for all workers, regardless of position or location, and to maintaining a work environment that promotes staff well-being, resilience, health and productivity.

You Uphold SV's Code of Conduct When You:

- Treat all colleagues with dignity and respect.
- Make employment decisions based on an individual's abilities and merits, not personal characteristics unrelated to the job.
- Respect the rights of all individuals.
- Provide reasonable accommodations for persons with disabilities or special needs.
- Reject any form of violence or abuse of power.
- Stay aware of safety and security concerns, follow local security protocols of SV's partners in the field, and stop any work that becomes unsafe.
- Safeguard the confidentiality of personal information.

You Should Avoid:

- Judging individuals based on factors unrelated to work.
- Off-colour jokes, offensive comments, derogatory e-mails, or sexually explicit images.
- Working while impaired by alcohol or illegal substances.
- Inappropriately disclosing employees' information, including personal information.

You Should Report:

- Unwanted, inappropriate or disrespectful sexual advances or harassment.
- Bullying, perceived threats, intimidation, favouritism, belittlement, verbal or physical out-rages.
- Situations that threaten the safety, security or well-being of staff.
- Hostility to individuals due to race, religion, gender, gender identity, sexual orientation, disability, veteran status or other characteristic protected by law.

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b. Our Commitments to Our Beneficiaries

SV aims to help people who are the victim of a conflict, or a natural disaster survive, and subsequently to support communities in finding structural solutions, so that people can improve their future without assistance. The foundation focuses its support mainly on refugees and internally displaced persons (IDPs). SV gives aid regardless of religion, race or nationality.

This requires our commitment to further their well-being and act with honour in carrying out the vital humanitarian role that has been entrusted to us.

You Uphold SV's Code of Conduct When You:

- Respect the dignity, values, history, religion and culture of those we serve.
- Select beneficiaries according to need, in line with programme specifications, without regard to race, creed, religion, nationality or other distinction.
- Protect beneficiaries from all forms of abuse, including sexual exploitation and human trafficking activities.
- Exercise special care to safeguard children.
- Respect confidentiality, abide by data-protection protocols, and share personal information about beneficiaries on a need-to-know basis in line with donor rules.
- Portray beneficiaries as dignified human beings in any images used in SV communications and use images only of individuals who have provided informed consent.
- Ensure research involving human subjects is properly approved before it begins.

You Should Avoid:

- Recruiting beneficiaries to work for SV staff in a personal capacity (e.g., as domestic workers).
- Engaging in any forms of intimidating, humiliating, degrading or aggressive behaviour towards beneficiaries.
- Physically punishing or disciplining beneficiaries.
- Sexual activity or intimate relationships of any kind with beneficiaries of any age.
- Transactional sex regardless of local laws that may permit it.
- Coercing beneficiaries to sell or relinquish relief items.

You Should Report:

- Exploitation of beneficiaries in any form.
- Corrupt or biased decisions to include or exclude beneficiaries.
- Abuse of power or position in the delivery of humanitarian assistance.
- Inappropriate disclosure of confidential information related to beneficiaries.

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c. Our Commitments to Our Donors

Our donors provide the resources that make our work possible, and we must be responsible stewards of those resources. We are committed to following the regulations and terms established by our institutional donors, as well as the expectations of all donors that the funding they provide serves beneficiaries efficiently and effectively.

You Uphold SV's Code of Conduct When You:

- Understand donor rules that apply to performance and accountability.
- Ensure time sheets, expense reports, advance liquidations and other financial documents are accurate.
- Select partners able to deliver the best outcomes for beneficiaries and monitor their work appropriately in line with donor rules.
- Safeguard the confidential and proprietary information of institutional donors and the personal privacy data of individual ones.
- Inform donors of any errors in reported information and strive for transparency.
- Conduct grant writing, fundraising, solicitation and marketing activities honestly and with integrity, in compliance with all applicable laws.
- Be truthful and forthcoming in all statements about SV and its performance.

You Should Avoid:

- Non-compliance with grant requirements or improper use of funding.
- False time and effort, expense, or cost reporting.
- Using existing grant funds to cover the expense of soliciting other grants without donor approval.
- Exaggerating or distorting programme needs, costs, beneficiary numbers or results.
- Manipulating the selection, unauthorised use or inadequate monitoring of (local) partners.
- Distorting claims about another organisation's services in comparison to our own.
- Gathering political, military or economically sensitive information on behalf of any donor for purposes other than humanitarian.
- Accepting gifts from donors derived from or associated with illegal, criminal or fraudulent activity.

You Should Report:

- Falsification of time, expense or cost reports.
- Fraudulent registration of beneficiaries.
- Theft or diversion of aid or resources.
- Improper fundraising practices.

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d. OUR COMMITMENTS TO OUR SUPPLIERS

Achieving good value for our purchases requires high integrity throughout our supply chain. We are committed to free and fair competition among suppliers, to the support of suppliers who share our adherence to ethical and responsible practices, and to the eradication of fraudulent or corrupt practices by those seeking improper gain from aid intended for beneficiaries.

You Uphold SV's Code of Conduct When You:

- Disclose any actual or perceived "conflicts of interest" in a procurement—that is, when personal interest may interfere with the promotion of SV's interests.
- Ensure good value when designing programmes and buying goods and services.
- Follow procurement policies, including policies related to purchase requests, bid notices, bid analysis, contracting and supplier due diligence.
- Treat qualified suppliers and their representatives fairly and equally.
- Observe strict confidentiality with supplier information, prices, terms and conditions.
- Provide suppliers with full and clear explanations when rejecting bids.
- Maintain segregation of duties related to the request, approval and verification of purchases.
- Discuss relevant procurement policies established by government or institutional donors at grant meetings.
- Determine whether export licenses are required, or restrictions apply before procuring any good, software or technology that is governmentally controlled or connected to a country where exports and imports are regulated.

You Should Avoid:

- Sharing information unequally to suppliers during the bidding process.
- Revealing confidential information of one supplier with another supplier.
- Accepting offers of anything of value (including gifts, favours, entertainment, bribes or kickbacks) that create or appear to create improper influence or unfair advantage.
- Accepting inferior or substitute goods or services that do not meet specifications.

You Should Report:

- Biased tender specifications, bidding documents or supplier pre-qualification.
- Bid rigging, collusion or other unfair practices among suppliers.
- Inadequate supplier due diligence.
- Transactions with parties involved in terrorist activities, child labour exploitation, human rights abuses, unsafe or unreasonable working conditions, or the illegal manufacture, supply or transportation of weapons.
- Requests to make a payment to a name other than the contracted party.

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e. OUR COMMITMENTS TO OUR PARTNERS

Working in partnership with local, national and international civil society organisations, as well as state and private sector entities is fundamental to SV's mission. We are committed to promoting effective partnerships that enable SV to pursue its strategic goals, resulting in more effective, responsive and durable assistance that reaches more people.

You Uphold SV's Code of Conduct When You:

- Promote partnerships based on accountability, transparency, respect, equity and inclusion.
- Select partners capable of responsible implementation and ensure that they receive the support necessary to meet established performance standards.
- Give partners full credit for the role they play in achieving programme outcomes.
- Support partners to avoid and mitigate, as far as is reasonably practical, foreseeable safety and security risks.
- Ensure clear, open and respectful two-way communication on performance.
- Take appropriate steps to ensure that SV's funds are used in accordance with applicable laws, donors' requirements and SV standards.
- Involve local partners in the planning, design, implementation and review of SV programmes whenever possible.

You Should Avoid:

- Condescending or disrespectful behaviour toward partner organisations and their staff.
- Any form of abuse of power in partner relationships.
- Misrepresentation of a partner's work as that of SV.

You Should Report:

- Actual or perceived "conflicts of interest" in partner relationships.
- Corrupt or biased decisions with respect to partner organisations.
- Fraudulent selection of partners.
- Theft or diversion of aid or resources by partners.
- Lax or inadequate monitoring of partner performance or effectiveness.

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f. OUR COMMITMENTS TO OUR ORGANISATION

SV transforms donor contributions into humanitarian aid for beneficiaries. To do this, SV must remain uncompromised and efficient in carrying out its work. We must safeguard SV's assets and put the interests of the organisation first.

You Uphold SV's Code of Conduct When You:

- Avoid and disclose to your supervisor actual or perceived "conflicts of interest" — that is, situations when personal interest in outcomes may interfere or conflict with SV interests.
- Use SV resources responsibly and lawfully and secure them from theft, fraud, waste, abuse or harm (without endangering yourself or others).
- Maintain accurate books and records.
- Observe proper controls and maintain segregation of duties related to the request, approval and verification of purchases.
- Monitor expense reports, vendor payments, payroll figures and budget variances for unusual activity.
- Protect confidential and proprietary information from unauthorised access or disclosure.
- Retain and discard documents in accordance with document retention policies.
- Cooperate fully when asked to provide information to an auditor or investigator.

You Should Avoid:

- Using your SV position or information for personal gain.
- Using SV time or property to perform work for another employer.
- Participating, without disclosure, in hiring or contracting decisions that involve individuals or entities with whom you have more than a professional working relationship.
- Seeking, accepting or offering anything of value (including gifts, favours, entertainment, bribes or kickbacks) that create or may appear to create improper influence or unfair advantage.
- Falsifying records or reports (including receipts, time sheets, inventories, financial statements, programme data, etc.).
- Improperly circumventing or overriding internal controls.
- Installing unauthorised IT hardware or software.
- Destroying records that are responsive to an active or anticipated audit, investigation, lawsuit or claim.
- Providing false, misleading or incomplete responses to information requests by auditors or investigators.

You Should Report:

- Fraud, theft, kickbacks or embezzlement.
- Use of SV's IT materials for personal benefit, political activity, unsolicited advertising, or the solicitation or performance of prohibited activities.
- Actions that may discredit SV's reputation or harm its public image.

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g. OUR COMMITMENTS TO SOCIETY

SV is committed to being a responsible global citizen. Our interactions with governments, regulators, the media and local communities must be grounded on honesty, trust and fairness. We support the legitimate rule of law and will do our part to promote high ethical standards in the countries and communities where we work.

You Uphold SV's Code of Conduct When You:

- Provide truthful and complete information when interacting with donors, the media, auditors, regulatory agencies or investigators.
- Connect our work to larger initiatives that bring protection, stability and inclusion to displaced populations.
- Minimise and mitigate any adverse environmental impacts caused by our operations.
- Ensure your activities are consistent with the standards contained in this Code when identifying yourself as a member of SV on social media.
- Seek guidance from the SV Management when dealing with countries under economic sanctions or when presented with boycott requests.
- Seek guidance from the Communications Department for all media outreach, responses, interviews and public advocacy inquiries.
- Seek guidance from the Advocacy Department for all lobbying activities.

You Should Avoid:

- Giving or receiving anything of value to anyone (including a government official) in order to influence decisions or to secure unfair advantage.
- Providing false, misleading or incomplete responses to valid requests for information by government agencies.
- Pressuring colleagues to make political or charitable contributions.
- Lobbying for legislative action or participating in any political campaign on behalf of SV without involvement from the Advocacy Department.
- Affiliations that could interfere with your impartiality (or appearance of impartiality) in carrying out SV work or that could harm SV's reputation.

You Should Report:

- Requests to cooperate with an unsanctioned boycott.
- Situations that endanger health, safety or the environment.

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5. OUR SHARED RESPONSIBILITIES IN UPHOLDING THIS CODE

Upholding this Code is a responsibility shared by all involved in delivering on SV's mission. It applies to all SV personnel: Supervisory Board, Executive Director, managers, employees, consultants, independent contractors, interns, volunteers and all partners who work on behalf of SV.

Individual Responsibilities

You are responsible for becoming familiar with the standards of conduct that apply to your job. You will be doing your part when you:

- **Stay informed** by learning the standards of conduct that apply to your role and participating in ethics and compliance training sessions.
- **Seek guidance** and consult with others when the appropriate course of action is unclear.
- **Stand firm** by resisting pressure to compromise our standards or cut ethical corners to meet an objective.
- **Raise concerns** if something does not seem right.

Manager Responsibilities

If you manage or supervise others, you have been placed in a position of trust. To maintain that trust, you should always:

- **Lead by example** and be a positive role model to others.
- **Promote awareness** of SV's standards and make sure those you supervise are equipped with the knowledge and resources they need to comply with them.
- **Monitor conduct** of those you supervise and take responsibility for activities that occur under your supervision.
- **Be responsive** to anyone who raises an ethics or compliance concern and make sure matters are resolved in a fair and appropriate manner.

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6. IMPLEMENTING THE CODE OF CONDUCT

This section describes the actions to take and procedures to follow for the proper implementation of the Code of Conduct throughout SV.

How to Spot Ethical Dilemmas

Before making a decision or pursuing a course of action, consider its potential ethical dimensions by asking yourself:

- Does the decision or action meet the letter and spirit of SV's Code and external obligations?
- Who might be affected by the decision?
- Would additional advice or expertise help?
- If this decision was made public, would I feel comfortable explaining it to colleagues or investigators?
- Is my judgment impartial, or do I have a personal stake in the outcome that makes me less objective?

Your Duty to Speak Up

One of the most tragic aspects of wrongdoing is when people look the other way. In addition to knowing the ethical and legal obligations that apply to your job, you are expected to speak up if:

- You are ever unsure about the proper course of action and need advice.
- Particular actions or decisions make you uncomfortable.
- You know or suspect that any of the following parties have been, or are about to be, engaged in illegal or unethical activity in connection with SV's work:
 - SV managers, staff, interns or volunteers
 - Suppliers
 - Partners or subcontractors
 - Agents, consultants or intermediaries acting on SV's behalf.

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Channels for Raising Concerns

SV has several channels of communication for staff seeking advice or wishing to report concerns. You should choose the channel you feel most comfortable with but note that colleagues closest to the situation—your supervisor or manager—are often in the best position to help. Available resources, listed in context of “sample issues,” include:

ISSUE	CONTACT/REPORT TO
Operational matters	Direct Supervisor
Workplace disagreement	Head Internal Affairs
Safety of (SV) personnel and resources	Executive Director and/or Head Programmes & Policy <i>External confidential counsellor (HR-006 on the ISO) for employees.</i>
Financial reporting, accounting, books and records	Head Internal Affairs
Compliance with donor grant requirements	Head of Programmes & Policy
Procurement or supply chain matters	Head Internal Affairs
Legal matters or policy interpretations	Head Internal Affairs
Code of Conduct matters (other than above)	Head of Programmes & Policy
Matters regarding implementing partners	Matters regarding implementing partners Always: SV’s Head of Programmes & Policy Regarding Intersos and other partners: check partners’ Codes of Conduct or relevant procedures

Documentation

All reported concerns or contacts regarding issues described in this Code of Conduct will be documented by the person receiving the concern or report. These documents will be stored both digitally on a protected file and archived on paper in a closed environment under control of the Head Internal Affairs.

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Anonymity and Confidentiality

You are encouraged to provide your name when raising a concern. This allows those who are responding to your concern to contact you if additional information is needed to look into your concern thoroughly. Providing your name also helps us ensure that you do not experience retaliation for making a good faith report (There may be unique circumstances when disclosing your identity is required by law or is necessary to fully investigate and address your concerns).

If you choose to identify yourself, SV will endeavour to keep your information confidential, sharing it only on a need-to-know basis among those directly handling or overseeing the issues you reported.

SV recognises that individuals may wish to raise concerns or infractions without thereby endangering their legal position. For these cases, an (external) confidential advisor has been appointed who can be approached and who can treat the disclosure according to the whistleblower policy (SV ISO-procedure HR-002). Contact details can be confidentially obtained through the executive secretary or through the secretariat of Stichting Save the Children. For employees there is also an external confidential counsellor for workplace related issues, information can be found SV ISO-006.

Anti-Retaliation Policy

SV will not tolerate retaliation against anyone who, in good faith, reports a concern or participates in an investigation, even if the allegation ultimately is not substantiated.

Anyone, regardless of position or tenure, found to have engaged in retaliatory conduct against someone who has raised an ethics or compliance concern will be subject to disciplinary action, and possibly termination. If you feel you have been subjected to retaliation, you should contact your supervisor for assistance.

SV encourages managers and employees to self-report violations and, depending on the specific circumstances, may treat self-reporting as a mitigating factor when assessing any disciplinary measures.

Responsiveness

SV takes all concerns seriously and acts on all reports. Out of respect for the privacy of individuals who may be affected by your report, SV may be unable to provide you with detailed results of our investigation or tell you what actions were taken in response. Whenever possible, we will provide you with status updates, so you know that your concern is receiving an appropriate response. The Executive Director and Head Internal Affairs also monitor the resolution of cases.

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Enforcement

Anyone who violates SV's Code or its underlying policies, regardless of position or tenure, may be subject to disciplinary action, including termination. The following are examples of conduct that may result in disciplinary action:

- Violating the Code
- Directing or encouraging others to violate the Code
- Failing to report known or suspected violations of the Code
- Interfering with an audit or investigation
- Being uncooperative or untruthful during an audit or investigation
- Retaliating against others for raising a concern

Violations of laws or regulations can trigger legal action against you, your colleagues, SV or its partners or suppliers that could result in:

- Fines
- Suspension
- Debarment
- Imprisonment

Zero tolerance

If, after a report or complaint of violations and following careful investigation, it is proven that someone has indeed committed an integrity violation, SV will always consider the proportionality of the disciplinary actions and punishments in relation to the severity of the offence. However, in case of acts of sexual exploitation and abuse or any other type of herewith associated unethical behaviour, SV applies a zero-tolerance policy: these will not be tolerated under any circumstances and will lead to the perpetrator's dismissal.

Training

SV will organise an annual training on the Code of Conduct and subjects related to the integrity system. All personnel of SV will be required to attend every year to these trainings and their presence will be registered in an attendance register.

Statement of Consent

People who work on behalf of SV will be asked to sign a statement certifying that they understand and will abide by this Code of Conduct. Each person will sign the statement when they begin working for SV, and each consecutive year thereafter. The code will be part of the employment conditions of all staff working with Stichting Vluchteling.

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7. RELEVANT DOCUMENTS AND INFORMATION

Related ISO-procedures of Stichting Vluchteling:

- HR-001 Labour Regulations
- HR-002 Whistle-blower Policy SV
- HR-006b&c Confidential Counsellor
- A-006 Fraud and Corruption Prevention Policy
- FIN-001 Procurement Policy (SV office)
- P-019 SV Humanitarian Procurement Policy
- Cd-003 Instructions for Implementing Partners (IPs) regarding reporting of SEA (sexual exploitation and abuse), fraud and other abuse

External reading

- Code of Conduct for the International Red Cross and Red Crescent Movement and NGOs in Disaster Relief
- UN Universal Declaration of Human Rights
- Convention on the Rights of the Child
- UN Secretary General's Bulletin on the Protection from Sexual Exploitation and Abuse of Beneficiaries.


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Stichting Vluchteling is door de Belastingdienst erkend als Algemeen Nut Beogende Instelling (ANBI). Dit betekent dat Stichting Vluchteling volledig is vrijgesteld van erfbelasting en wij nalatenschappen voor 100% kunnen inzetten.