

CODE OF CONDUCT





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POLICY	Code of Conduct
VERSION	2023.05v2
OWNER	Human Resources International Management Group (HR IMG)
APPROVER	International Executive Committee (IEC)
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- **1.1.** Action Against Hunger is a global humanitarian organization that fights hunger and its root causes worldwide by a commitment to and observance of our six founding principles (Charter of Principles) of "Independence", "Neutrality", "Non-discrimination", "Unrestricted Access to Humanitarian Assistance", "Professionalism", and "Transparency". We improve the lives of those affected by hunger and malnutrition through our work with local communities, governments, and partners to ensure that our programs and interventions are sustainable and have a long-lasting impact.
- **1.2.** As a global humanitarian organization, we hold ourselves accountable to the highest standards of conduct. This means being respectful to each other, upholding the principle of "*do no harm*" when working with program participants and communities we serve, as well as respecting the environment and local contexts in which we operate.
- **1.3.** This *Code of Conduct* (*the Code*) applies to all our employees and Associated Personnel.¹
- **1.4.** The Code sets guidelines that outline rules of conduct, ethical standards, and principles that aim to protect our employees, maintain integrity and respect for people with whom we come in contact, ensure the effectiveness of our work, and uphold the reputation of the organization. The Code provides a frame of reference to facilitate prudent, critical, and analytical decision-making coherent with our or ganizational values and *Charter of Principles*.
- **1.5.** Each Action Against Hunger International Network entity may enhance this Code by maintaining its internal regulations and adapt the values and principles of the organization to its national laws and customs. Any adaptations should not breach or be in contradiction with this Code.

¹ Persons working with or on behalf of Action Against Hunger while not holding employment contracts. For the purposes of the Code, this includes interns, volunteers, board members, organizational ambassadors, trustees, and consultants that can be identified with Action Against Hunger.

A. GENERAL RULES

- **2.1.** The conduct of all our employees and Associated Personnel must be consistent with the rules set out by this *Code* and our *Charter of Principles* and must not in any way harm or compromise the reputation of the organization having its best interest at heart.
- **2.2.** Supervisory and managerial staff must set an example of professional conduct and ethical behaviour, ensure compliance of individuals under their supervision with this Code and enforce it as necessary.
- **2.3.** Employees and Associated Personnel are obligated to report to their supervisors or the ethics committee (or equivalent platform), responsible for our workplaces, any possible breaches of this Code without fear of retaliation.
- **2.4.** Employees and Associated Personnel must comply with the laws and regulations of the countries in which they work for the entire duration of their employment, assignment, visit, or deployment.
- **2.5.** Employees and Associated Personnel must comply with safety rules, regulations, and security plans applicable to them. They must, at all times, demonstrate vigilance and discipline as the circumstances require, especially during emergencies and situations of conflict in which the organization operates.
- **2.6.** Employees and Associated Personnel are required to convey a professional image and maintain a respectful attitude through their conduct, dress, and language toward the religious beliefs, rules, conventions, practices, and customs of the countries in which they work for the entire duration of their employment, assignment, visit, or deployment.
- **2.7.** Especially in programmatic settings, all employees and Associated Personnel must refrain from any behaviour, that they are aware of or ought to be aware of as inappropriate, whether illegal or not, when such behaviour may seem inappropriate in a particular situation they find themselves in. This rule applies to personal lives and outside of work hours as well.
- **2.8.** Employees and Associated Personnel must ensure that their interactions with people they come into contact with, in particular with our program participants, are guided by thoughtfulness and determination to respect and/or restore their dignity. They need to be mindful that their actions may have an unintended impact on the lives of many individuals.
- **2.9.** During organizational events where alcohol is served, employees and Associated Personnel who choose to consume alcohol must do it responsibly, not over-consume, and not drink and drive. Any type of inappropriate behaviour because of alcohol consumption will not be condoned by the organization.
- **2.10.** Based on our principle of "*Neutrality*", employees and Associated Personnel must refrain from making comments, whether in official or private communications, about internal organizational, political, or military situations that could harm Action Against hunger's reputation or hinder its ability to implement programming. This rule applies at all times (24/7), both in private and whenever an employee represents the organization in public.



B. SPECIAL RULES

- **2.11.** Employees and Associated Personnel must demonstrate respect and sensitivity to gender issues as well as promote gender equality in all aspects of their work and behaviour as outlined in *Action Against Hunger's Gender Equality Policy*.
- **2.12.** Employees and Associated Personnel must comply with the **Action Against Hunger International Safeguarding Policy** and contribute to its implementation.
- **2.13.** Employees and Associated Personnel should promote and respect international conventions on basic social and labour rights (as suggested by the **UN Global Compact**) according to the legal requirements of each International Network legal entity.
- **2.14.** Employees and Associated Personnel must ensure they never possess, transport, or use weapons and/or ammunition.
- **2.15.** It is strictly prohibited for all employees and associated personnel to consume, manufacture, purchase, sell, possess and/or distribute drugs irrespective of the fact whether they are legally or socially permitted.

3. HARASSMENT, SEXUAL EXPLOITATION, AND ABUSE OF POWER

- **3.1.** Harassment in any form, including sexual harassment, is strictly prohibited. Harassment can be thought of as any behaviour that demeans, embarrasses, humiliates, annoys, alarms or verbally or psychologically abuses a person and that is known or would be expected to be unwelcome. These behaviours include words, gestures, intimidation, bullying, or other inappropriate activities.
- **3.2.** Any form of violence is strictly prohibited. Violence can be thought of as any act in which a person is abused, threatened, intimidated, or assaulted.
- **3.3.** Engaging in any form of sexual exploitation and abuse or purchasing sexual services are strictly prohibited, even when these may be the social customs, norms or legally acceptable practices in a given country. Action Against Hunger believes that behaviour that threatens sexual freedom is totally unacceptable, including the following practices: sexual exploitation, sexual abuse, sexual relations with children, sexual assault, or any form of contribution to the "sex market".
- **3.4.** Employees and Associated Personnel must exercise the use of their authority and power appropriately. They must avoid any abuse of power which refers to any actual or attempted use of one's position to receive favours from someone of lesser power including in situations where the abuser profits monetarily, socially, or politically from the exploitation of another.

4. CONFLICT OF INTEREST

- **4.1.** Employees and Associated Personnel must avoid any conflict of interest either personal and/or professional when carrying out their duties.
- **4.2.** Employees and Associated Personnel must not participate in activities or decisions where their personal, familial, or financial interests might compromise their ability to make an impartial decision concerning any proposed transaction, contract, or other arrangements, or prevent them from acting in the best interests of the organization.
- **4.3.** Employees and Associated Personnel must be considerate of the cultural and legal contexts of the countries in which they work before engaging in close relationships with other Action Against Hunger employees or people who are engaged in any work with the organization and be mindful of the impact that the relationship may have on the reputation, safety, and efficacy of the organization.
- **4.4.** Employees and Associated Personnel are prohibited from accepting monetary gifts.
- **4.5.** Employees and Associated Personnel are prohibited from accepting gifts in kind except for gifts of symbolic value that are presented in accordance with local customs.
- **4.6.** Bribes must not be accepted or offered to public officials, other employees or third parties, even if the intended goal is a "*good cause*". Active or passive corruption is bad practice and is prohibited by the organization.
- **4.7.** The Action Against Hunger International Anti-Fraud Policy forbids dishonest and fraudulent practices including but not limited to fraud, corruption, asset misappropriation, and fraudulent statements.

5. CONFIDENTIALITY, USE OF RESOURCES, AND INFORMATION TECHNOLOGY

- **5.1.** Employees and Associated Personnel must ensure that all data, documents, and information received during the course of their work or engagement with the organization remains confidential and is not shared with a third party without the written consent of their supervisor.
- **5.2.** Employees and Associated Personnel must be aware that improper dissemination of confidential information may have an impact on the organization's image or their personal safety.
- **5.3.** Dissemination of any information, comments or images related to Action Against Hunger activities, which is not public knowledge, via any audio-visual media, social networking, blog, etc. is strictly prohibited without Action Against Hunger's express permission.
- **5.4.** Employees and Associated Personnel must use organizational resources appropriately and refrain from engaging in unfair competition. Furthermore, employees and Associated Personnel may not be involved in any unfair competition by using the organizational information and knowledge for their personal gain.
- **5.5.** Employees and Associated Personnel are prohibited from using the Action Against Hunger's name, image, assets, or resources (including data, information or documents produced over the course of any contractual relationship with the organization) for personal gain or private purposes.
- **5.6.** Employees and Associated Personnel must use the organization's funds and supplies in a proper, transparent, and accountable manner, and manage them carefully and accurately.
- **5.7.** Employees and Associated Personnel may not incur any obligation on behalf of the organization without official authorization from their supervisor.
- **5.8.** Action Against Hunger's information technology should be used by employees and Associated Personnel solely for professional purposes. However, personal use of the technology is allowed, provided that such use:
 - Does not pose a cybersecurity risk to the organization.
 - Does not interfere with the employee's or Associated Personnel's professional duties or cause any extra expenses for the organization.
 - Does not entail the download of any software, images, sound, or video.
 - Does not involve the excessive storage of personal data or messages, or the management of private files on the information systems belonging to the organization.
 - Does not contravene the rules outlined in this Code or any internal cybersecurity policies and/or regulations established by each International Network entity.
- **5.9.** Employees and Associated Personnel are required to use exclusively the information technology tools authorized or provided by Action Against Hunger when accessing or exchanging organizational information electronically and to ensure that all cybersecurity policies and procedures, as established by each International Network entity, are strictly adhered to.
- **5.10.** The transmission or storage of information that requires special handling is prohibited through information technology solutions security of which is not guaranteed by the organization.

6. HUMAN RIGHTS AND THE ENVIRONMENT

- **6.1.** Given the vulnerability of children and at-risk adults, all employees and Associated Personnel must commit to the protection of human and children rights in all areas of organizational activities in compliance with the **Action Against Hunger International Safeguarding Policy** and relevant international human rights law.
- **6.2.** No employee, Associated Personnel, or person we come in contact with will be discriminated against for any reason, including race, caste, creed, nationality, religion, age, physical or mental disability, gender, marital status, sexual orientation, and/or trade union or political membership.
- **6.3.** Employees and Associated Personnel are required to demonstrate respect and sensitivity to the natural environment and work in a sustainable way to avoid activities that may cause harm, irrespective of whether they are prohibited by local laws or not.

7. MISCONDUCT

- **7.1.** Action Against Hunger is dedicated to promptly and appropriately responding to violations of this Code by analyzing each misconduct in its entirety and evaluating the consequences of the violation taking into consideration: the degree of intentionality, damage to the interests and principles of the organization, legal implications (national, international), previous violations, and whether the case is a repeat violation or not.
- **7.2.** Breaches of the Code may have consequences for the contractual relationship between the organization and the employee resulting in disciplinary action, up to and including termination of employment and initiation of legal action against the violator.
- **7.3.** Breaches of the Code may have consequences for the contractual relationship between the organization and the Associated Personnel resulting in termination of contractual relationship and initiation of legal action against the violator.
- **7.4.** Breaches of the Code may also be brought to the organization's attention by others who are not Action Against Hunger employees or Associated Personnel.
- **7.5.** If an employee or Associated Personnel breaches the Code or becomes aware of another individual breaching the Code, they are under an obligation to notify their supervisor. If the Code is breached by the employee's or Associated Personnel's supervisor, the violation can be reported to the second-level supervisor or to Human Resources in accordance with the prescribed reporting procedures established in each International Network entity. Failure to report a breach of the Code may result in disciplinary action for employees or termination of contractual relationship for Associated Personnel.
- **7.6.** The organization will subject any violation of the Code to scrutiny in accordance with the applicable disciplinary procedures existing in each International Network entity.

8. TRAINING AND COMPLIANCE

- **8.1.** Action Against Hunger is committed to informing all employees and Associated Personnel about the contents and application of this organizational Code. Every International Network entity will implement processes and supervisory mechanisms to ensure compliance with this Code and will review matters relating to it as per the existing internal procedures and regulations.
- **8.2.** All employees and Associated Personnel will be required to sign this Code upon the commencement of their contractual relationship with the organization.
- **8.3.** The guidelines outlined in the Code are applicable throughout the entire duration of an employee's and Associated Personnel's contractual relationship with the organization including non-working hours.