



CODE OF CONDUCT FOR ACTION AGAINST HUNGER STAFF AND OTHER TEAM MEMBERS

A. BACKGROUND AND ACTION AGAINST HUNGER ORGANIZATIONAL FRAMEWORK OF VALUES AND PRINCIPLES

What's the purpose of a CODE OF CONDUCT?

The Action Against Hunger **Code of Conduct** (also sometimes called the **Code of Ethics** or **Deontology**) outlines the basic rules of conduct, ethics and essential principles to be observed by all Action Against Hunger employees and team members. The Code of Conduct is the logical and practical application of the Action Against Hunger Charter of Principles. As such, it is intended as a **guide for addressing the ethical dilemmas** that an Action Against Hunger employee or team member may encounter in the course of their work.

The Code of Conduct aims to act as a **compass** to guide our behaviour while working to achieve Action Against Hunger's goals, as well as to provide a **frame of reference** which will facilitate prudent, critical and analytical decision making **coherent** with the values and principles of Action Against Hunger.

Action Against Hunger has developed many related policies and tools to assist employees and team members to implement the organization's values and principles. Some of the most relevant are the following:

ACTION AGAINST HUNGER CHARTER OF PRINCIPLES

All members of Action Against Hunger, world-wide, adhere to the 6 founding principles (Independence, Neutrality, Non-discrimination, Free and direct access to victims, Professionalism, and Transparency) of this Charter and are committed to respecting it.

SPECIFIC ACTION AGAINST HUNGER POLICIES DIRECTLY RELATED WITH TO OUR VALUES, SUCH AS:

- Action Against Hunger Anti-Bribery, Corruption and Abuse of Power policy
- Action Against Hunger Child Protection policy
- Action Against Hunger Policy Paper On HR And Training
- Action Against Hunger Partnership Policy
- Action Against Hunger Institutional Principles Of Security
- Action Against Hunger Standard Operational Protocol Emergency Response
- Action Against Hunger Brand Identity Policy
- Action Against Hunger-Research Policy
- Action Against Hunger Ethics & Research Policy
- Action Against Hunger Advocacy Policy
- Action Against Hunger Gender policy

INTERNAL REGULATIONS

Every Action Against Hunger mission maintains their own Internal Regulations which adapt our values and principles to national laws and customs. Any adaptations should not breach of this Code of Conduct.

OTHER EXTERNAL CODES OF CONDUCT SIGNED BY ACTION AGAINST HUNGER:

- International Committee of the Red Cross (ICRC) Code of Ethics
- Other ethical codes which may be signed individually by one HQ (and will only apply to the signatory HQ).

B. ETHICS: RULES OF CONDUCT FOR ACTION AGAINST HUNGER STAFF AND OTHER TEAM MEMBERS

The Action Against Hunger Code of Conduct is a general set of rules which may be extended or implemented by every Action Against Hunger HQ using HQ-specific documents, or national policies or procedures.

Action Against Hunger employees and team members voluntarily agree to respect the following rules of conduct which are grouped into three main areas:

- Human Rights
- Social and Labour Rights, Professional Conduct and Coexistence
- Other Rights



1. RULES OF CONDUCT RELATED TO HUMAN RIGHTS

- 1.1 NO DISCRIMINATION:** No Action Against Hunger beneficiary or partner 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.
- 1.2 PROTECTION OF CHILDREN:** Given the particular vulnerability of children, all ACTION AGAINST HUNGER employees and team members commit to the protection of children in all areas of Action Against Hunger's activities.
- 1.3 SEXUAL CONDUCT:** Any form of sexual, psychological or verbal abuse or physical harassment is strictly prohibited. For both ethical and safety reasons, Action Against Hunger employees and team members are prohibited from engaging in any form of sexual exploitation, even when these may be the social customs or legally acceptable in the host country. Irrespective of other risk assessments, Action Against Hunger believes that behaviour that threatens sexual freedom is totally unacceptable, including the following prohibited practices: sexual harassment, sexual abuse, sexual relations with children, sexual assault, sexual exploitation, or any other contributions to the "sex market".

2. RULES OF CONDUCT RELATED TO SOCIAL AND LABOUR RIGHTS, PROFESSIONAL CONDUCT AND COEXISTENCE

- 2.1** It is essential that Action Against Hunger employees and team members comply with the laws and regulations of their host country (country of assignment) for the duration of their work/service, especially concerning all safety and traffic laws. Where compliance with local laws constitutes a conflict with the Action Against Hunger Code of Conduct, Action Against Hunger employees and team members should consult their supervisor or their mission's managing HQ's ethics committee (or equivalent platform).
- 2.2** International conventions on basic social and labour rights (as suggested by the UN Global Compact) should be promoted and respected according to the legal requirements of each managing HQ.
- 2.3** It is compulsory for all Action Against Hunger employees and team members to respect the following rules of professional conduct. More specifically they are required to:
- Be responsible for ensuring compliance with the Code of Conduct within their teams. All Action Against Hunger employees and team members are obligated to inform their supervisor, or their mission's managing HQ's ethics committee (or equivalent platform), of any possible breaches of the Code of Conduct.
 - Respect their managing HQ and mission's security plans.
 - Use Action Against Hunger funds in a proper, transparent and accountable manner, meaning:



- **Funds and supplies assigned to Action Against Hunger employee and team members must be managed carefully and accurately.**
 - **No obligation may be incurred on behalf of Action Against Hunger** without official authorization to do so.
 - **No gift in kind may be accepted**, with the exception of gifts of symbolic value that are presented in accordance with local custom.
 - **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 prohibited by Action Against Hunger. The [Action Against Hunger Anti-Bribery, Corruption and Abuse of Power policy](#) forbids the following corrupt practices: bribery, fraud, money laundering, extortion, facilitation payments, embezzlement, nepotism, favouritism, and patronage.
- **Exercise the use of their authority and power appropriately.** All Action Against Hunger employees and team members **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.
 - **Avoid any Conflict of Interest – either personal and/or professional.** Action Against Hunger employees & team members must:
 - Take into account Action Against Hunger's interests when carrying out their activities. **They 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 arrangement**, or prevent them from acting in the interests of Action Against Hunger's objectives.
 - Consider the need to respect the cultural and legal context of their host country before engaging in close relationships with other Action Against Hunger employees or stakeholders, along with a review of the impact of the relationship on the reputation, safety and efficacy of Action Against Hunger's activities.
 - Respect that all data, documents and information received during the course of their work should remain confidential, and cannot be shared with a third party without the written consent of their supervisor. **Action Against Hunger retains the rights to all intellectual property and the copyright** for any material created by an Action Against Hunger employee or team member during the course of their assignment.
 - **Appropriately use organizational resources, observe their duty of confidentiality and refrain from involvement in unfair competition.**
 - It is prohibited to use Action Against Hunger's name, image, assets or resources (including data, information or documents produced during the course of any assignment) for personal gain or private purposes. Action Against Hunger employees and team members may not be involved in **unfair competition** by using Action Against Hunger information and knowledge for their personal gain.
 - All information concerning Action Against Hunger remains **confidential**. Action Against Hunger employees and team members must remain



aware that its improper dissemination may have an impact on Action Against Hunger's image or their personal safety.

- Dissemination of any information, comments or images related to an Action Against Hunger activity, via any audio-visual media, social networking, blog, etc. is strictly prohibited without Action Against Hunger's express permission.

2.4 It is compulsory for all Action Against Hunger employees and team members to respect the following rules of personal conduct and coexistence. More specifically, they are required to:

- **Maintain a respectful attitude towards the religious beliefs and customs of their host country.**
- **Wear appropriate attire**, in accordance with local customs and conventions, always conveying a professional image.
- **Remember that neutrality is one of Action Against Hunger's main principles. Accordingly, no mention of a mission's internal situation, or of political or military situations or opinions, should be made in either official or private communications.** This rule applies at all times (24/7) both in private, as well as whenever an employee or team member represents Action Against Hunger in public. For national staff an exception may be made to this rule during non-working hours if it conflicts with national law.
- **Ensure they never possess, transport or use weapons and/or ammunition.**
- **Observe a complete prohibition on the use of drugs**, irrespective of whether they are classified as "hard" or "soft" drugs, or whether drugs are legally and/or socially permitted in their mission.
- **Act in accordance with all instructions and directives sent from the mission's Managing HQ.**
- **Demonstrate respect for individuals** by ensuring individual actions and interactions with others are guided by respect and a determination to restore dignity to beneficiaries.

3. CONDUCT RELATED TO OTHER RIGHTS

Action Against Hunger employees and team members demonstrate respect and sensitivity to:

- **The environment, avoiding activities that may cause harm**, irrespective of whether they are prohibited by local law
- **Gender issues**, promoting through action and everyday communication, the principles of fairness and equality between men and women, as outlined in [Action Against Hunger's Gender Policy](#).



C. **APPLICABILITY, ASSESSMENT CRITERIA AND REVISION MECHANISMS OF THE CODE OF CONDUCT**

1. APPLICABILITY

- This code of conduct applies to **all Action Against Hunger employees, team members and partners**. More specifically, it applies to the following groups:
 - All paid staff in headquarters and local offices
 - All volunteers and interns in headquarters and local offices
 - All international staff working in missions managed by Action Against Hunger, regardless of their hiring HQ.
 - All national staff working in missions managed by Action Against Hunger
 - Action Against Hunger's local partners who co-implement projects
 - Any other people not formally related to Action Against Hunger by contract or agreement, but who either work or stay (even temporarily) at the organization's office or residential premises.
- All Action Against Hunger HQs are committed **to informing and properly training** all employees, partners and temporary visitors about the content and application of the organization's Code of Conduct.
- The guidelines outlined in the Action Against Hunger Code of Conduct **are applicable throughout the duration of an employee or team member's contract or agreement with Action Against Hunger**. A contract or agreement includes non-working hours and the entire contract term.

2. ASSESSMENT CRITERIA FOR ANY VIOLATION OF THE ACTION AGAINST HUNGER CODE OF CONDUCT

- Each individual violation of the Action Against Hunger Code of Conduct will be analysed **in its entirety**. Each review should evaluate the consequences of the violation, and may take into account some **considerations** such as degree of intentionality, damage to the interests and principles of Action Against Hunger, legal implications (national, international), previous violations, recidivism and whether the case is a repeat violation.
- Breaches of the Code of Conduct may have consequences for the contractual relationship between Action Against Hunger and an employee or partner, including disciplinary sanctions (including possible contract termination), and the initiation of legal action against the violator, as per any Action Against Hunger HQ procedures.

3. MECHANISMS TO REVIEW, TRAIN AND ENSURE COMPLIANCE

Every Action Against Hunger HQ has procedures & supervisory mechanisms **charged with training, implementing and reviewing all matters related to the Code of Conduct**.



As this Code of Conduct applies to all employees, team members and partners of Action Against Hunger, if an Action Against Hunger employee breaches the Code of Conduct, or knows of, or becomes aware of another employee breaching the Code of Conduct, they are under an obligation to notify their line manager, or the supervisory mechanism of their mission's managing HQ. Breaches of the Code of Conduct may also be brought to Action Against Hunger's attention by others who are not Action Against Hunger employees.

Any breach of the Code of Conduct brought to Action Against Hunger's attention, or of which Action Against Hunger becomes aware through other means, will be reviewed according to the organization's disciplinary procedures.

ADDENDUM

Action Against Hunger is committed to a **ZERO- TOLERANCE** policy of sexual abuse, abuse of power, bribery and corruption, in any form, and resolves to take all reasonable actions. The organisation has developed and enforced consequent policies at all levels.

1. ZERO TOLERANCE of SEXUAL ABUSE:

Action Against Hunger fully complies with the **IASC** Six Core Principles Relating to Sexual Exploitation and Abuse:

1. "Sexual exploitation and abuse by humanitarian workers constitute acts of gross misconduct and are therefore grounds for termination of employment.
2. Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is not a defence.
3. Exchange of money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour is prohibited. This includes exchange of assistance that is due to beneficiaries.
4. Sexual relationships between humanitarian workers and beneficiaries are strongly discouraged since they are based on inherently unequal power dynamics. Such relationships undermine the credibility and integrity of humanitarian aid work.
5. Where a humanitarian worker develops concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether in the same agency or not, he or she must report such concerns via established agency reporting mechanisms.
6. Humanitarian workers are obliged to create and maintain an environment which prevents sexual exploitation and abuse and promotes the implementation of their code of conduct. Managers at all levels have particular responsibilities to support and develop systems which maintain this environment."

Action Against Hunger commitment to a **ZERO- TOLERANCE** policy of sexual abuse is reflected and developed in the following internal policies: "CHILD PROTECTION POLICY", "GENDER POLICY", and "SEXUAL VIOLENCE POLICY".



2. ZERO TOLERANCE OF BRIBERY AND CORRUPTION

Action Against Hunger strives to meet the highest ethical standards and to conduct business in an honest way, free from corrupt practices or acts of bribery. Bribery and corruption can be found in all countries, diverting resources intended to help individuals and communities in need and undermining our effectiveness and reputation as a humanitarian aid organization. Action Against Hunger has longstanding commitment in this regard, as stated in its “Charter of Principles”¹.

Action Against Hunger has also agreed to establish an **IMPLEMENTATION AND STAFF TRAINING PLAN** to sensitize, inform and train staff both, at headquarters, and on mission assignments. Training is conducted on the following related ethic management documents (policies, procedures or other reference documents).

- ✓ **Code of Conduct**
- ✓ **Conflict of Interest**
- ✓ **Child Protection Policy**
- ✓ **Workplace Harassment**
- ✓ **Whistleblowing**
- ✓ **Beneficiary Complaint**
- ✓ **Incident Reporting Process**

These policies are applicable to all Action Against Hunger staff, internships and volunteers. Field and headquarters staff provides continual training and monitoring of its implementation. Action Against Hunger commitment to a **ZERO- TOLERANCE** policy of Bribery and Corruption is reflected and developed in the following internal policies: “FRAUD AND CORRUPTION POLICY” “BENEFICIARY FEEDBACK MECHANISM”.

3. ZERO TOLERANCE OF ABUSE OF POWER

Action Against Hunger strives to meet the highest ethical standards in the prevention and management of the Abuse of Power: This refers to any actual or attempted use of one’s position to receive favours from someone of lesser power. Action Against Hunger acknowledges the following forms of abuse of power:

- ✓ **WORKPLACE HARASSMENT:** Discriminatory practices based on race, colour, religion, gender, national origin, sexual orientation, age or disability (See individual HQ policies).
- ✓ **SEXUAL HARASSMENT:** Unwelcome sexual advances, requests for sexual favours, and any other unwelcome verbal or physical conduct of a sexual nature (See individual HQ policies)
- ✓ **SEXUAL ABUSE/ SEXUAL EXPLOITATION:** Sexual abuse is the actual or threatened intrusion of a sexual nature, whether by force or under unequal or coercive conditions, usually involving differential power or trust leading to acts for sexual purposes, including, but not limited to profiting monetarily, socially or politically from the sexual exploitation of another.

¹ PROFESSIONALISM: “ACF bases the conception, realization, management and assessment of its programs on professional standards and its years of experience to maximize its efficiency and the use of resources.”

TRANSPARENCY: “ACF is committed to respecting a policy of total transparency to beneficiaries, partners and donors and encourages the availability of information on the allocation and management of its funds. ACF is also committed to providing guarantees of its good management”.



- ✓ **CHILD PROTECTION ISSUES:** Child abuse taking place due to the actions or inactions of any ACTION AGAINST HUNGER Representative (see separate network policy)

Action Against Hunger commitment to a ZERO- TOLERANCE policy of Power of Abuse is reflected and developed in the following internal policies: "FRAUD AND CORRUPTION POLICY" "BENEFICIARY FEEDBACK MECHANISM" "SEXUAL VIOLENCE POLICY".

Action Against Hunger guarantees the appropriate follow up of the institutional ethical tools and policies with the support of an Ethical Committee. Our policies, and mandatory procedures, assist and guide Action Against Hunger staff in preventing, identifying, and dealing with any concerns that may bring into question the safeguarding of our values and ethical code.

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