



Standard operating procedure

Title: Ethics policy

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ETHICS POLICY

1. Purpose

Concept Foundation (CF) in serving its mission is committed to ethical, lawful, responsible, and transparent behaviors in all of our activities. The purpose of this Policy is to state CF's commitment to ethics, to raise and lay down the principles to be applied to CF's work and its Staff Members, and outline recommendations for consultants working under CF contract. CF representatives are therefore expected to conduct themselves according to both the language and spirit of this Policy and seek to avoid even the perception of unethical behavior. This Policy should be interpreted to be consistent with other CF policies and applicable laws and regulations.

2. Definitions

- a. Senior management shall mean the Executive Director (ExD) and Director of Programmes (DoP) of CF.
- b. Staff member shall mean a person working under an employment contract with CF.
- c. Consultant shall mean a person/legal entity working under contract with CF.

3. Scope of application

3.1. The CF Ethics Policy applies to all Staff members. Its application is recommended to consultants in relation to the execution of their CF mandates.

3.2. This Policy is not designed to be an all-inclusive rubric for ethical behaviour, but instead provides a framework of policies that serves to structure the understanding and increase the awareness of all CF staff and consultants regarding the potential ethical dilemmas with which they might be confronted while working at or in the service of CF.

3.3. Ethical behavior requires making determinations as to the correct course of action, often without clearly established rules or laws. Ethics is thus not about following a strict set of guidelines, but rather about doing more generally the right thing. In this respect, a successful ethics policy facilitates behavior that by example leads to the development of an ethics-focused organizational culture and environment. The responsibility to behave ethically and in a manner that enhances CF's reputation and supports the achievement of its mission and goals is therefore shared by all CF staff and consultants.

4. Conflict of interest

4.1. The reputational risks inherent in a conflict of interest are of particular importance to CF given its reliance on the cooperation and support of its stakeholders and donors.

4.2. A conflict of interest in and of itself may not be wrong and may not be unethical, but CF representatives must take appropriate action to ensure disclosure of any actual, perceived or potential conflict of interest in order to comply with this Policy.

4.3. This section of the Policy should be read in conjunction with CF's Conflict of Interest Policy.

5. Outside activities and employment

5.1. A CF staff member may engage in outside activities that do not conflict with the organization's interests or the staff member's responsibilities to CF and he or she will consult with Senior

management, as appropriate, in case of doubt as to whether an activity would constitute a conflict with CF's interests or his or her responsibilities to CF.

5.2. A CF representative invited to speak at conferences or meetings on behalf of CF is encouraged to do so to the extent such conferences or meetings relate to or further the mission of CF. Participation should as appropriate be pre-approved by Senior management.

5.3. Any individual who has served as a Board member will not be eligible for employment with CF until one year following their last date of service in such a position. The Chair of the Board in consultation with Senior management may waive this on a case by case basis.

5.4. This section of the Policy should be read in conjunction with CF's Conflict of interest Policy and its Human Resources Handbook.

6. Donations, Contributions, Gifts

6.1. CF may accept donations (in-kind gifts) or contributions (cash gifts) only for programmes, services and purposes consistent with its mission, purposes and priorities. CF will not accept donations or contributions having restrictions that prevent it from effectively using the donation or income derived from the donation in furtherance of its charitable mission unless with prior approval by the ExD or the Board.

6.2. CF will not accept donations or contributions that inhibit it from seeking donations or contributions from other donors or donations if they involve unlawful discrimination.

6.3. CF will not accept donations or contributions from companies or organizations that exploit child labour or are involved in or connected to the manufacture of tobacco, weapons of any kind, including land mines, or drugs (excluding pharmaceutical companies).

6.4. Donations or contributions shall not be accepted from companies that represent a direct conflict of interest for the organization.

6.5. CF representatives may not solicit or accept, directly or indirectly, any cash or monetary equivalents (i.e., stock or other marketable securities), object of value or preferential treatment or seek or accept loans (other than conventional loans at market rates from lending institutions) from any person or entity that has done business with, or is seeking to do business with the organization.

6.6. Unsolicited gifts may be accepted on behalf of CF when refusal to do so would not be in the best interest of the organization. Business-related meals, entertainment, token gifts or favours may be accepted only when the value involved is low and will not place the recipient under any obligation, either real or perceived, to the donor.

6.7. CF representatives may not offer gifts or entertainment to persons or entities whose support or business CF may be seeking. CF strictly prohibits payments of any kind to any person to influence or advance CF's interests with private individuals or governmental officials.

6.8. Employees involved with procurement on behalf of CF or with the preparation, approval, monitoring and evaluation of in-country programme activities should take particular care, and when involved in any active tender, or after the awarding of a contract, should not accept any gifts or hospitality from relevant third parties.

6.9. Questions regarding the acceptability of a gift should be directed to Senior Management.

6.10. This section of the Policy should be read in conjunction with CF's Conflict of interest Policy and its Human Resources Handbook

7. Equal opportunity, non-discrimination, and harassment

7.1. CF values a work environment where diversity is embraced, and where employees are treated, and treat each other, fairly and with respect and dignity. CF prohibits discrimination on the basis of any criteria protected by law, including, but not limited to, race, colour, religion, sex, gender, marital status, national origin, age, disability or sexual orientation, whether committed by or against an employee, vendor, visitor or otherwise in the workplace. Conduct involving discrimination or harassment by CF representatives will not be tolerated and where the CF representative is an employee, will be responded to in accordance with the relevant Human Resources Policies.

7.2. This section of the Policy should be read in conjunction with CF's Human Resources Handbook.

8. Confidentiality

8.1. All CF representatives have the responsibility to protect the confidentiality of information reasonably understood to be confidential obtained or created in connection with their activities at CF. Proprietary information about CF or its employees, or confidential information about a company, organization or any individual having a relationship with CF, must not be disclosed unless disclosure is authorized or legally mandated. In addition, Confidential information provided by a partner

organization under a confidentiality agreement must also be protected from disclosure and must not be used except for its intended purpose. This would not preclude a CF representative from reporting back to his or her organization or constituency unless explicitly requested not to do so by Senior management or the Chair of the Board, in cases of commercially sensitive information, information on personal data or information related to investigations into allegations of misuse in CF supported programmes.

8.2. Paperwork and documents related to CF operations should be produced, copied, faxed, stored and discarded by means designed to minimize the risk that unauthorized persons might obtain access to proprietary or confidential information. Access to work areas and computers must also be properly controlled. Additionally, discussion of sensitive matters or confidential information in public places where others might overhear should be avoided.

8.3. Any unauthorised use or disclosure of proprietary information violates CF policy. The obligation to safeguard confidential information continues after employment or service with CF ends.

8.4. This section of the Policy should be read in conjunction with CF's Human Resources Handbook and Data privacy policy.

9. Media and public enquiries and statements

9.1. Communication with the media and general public must be accurate, responsible and in keeping with CF's communication policies.

10. Government requests for information

10.1. In addition to any legal obligations it may have, CF cooperates with all government departments or agencies in any reasonable requests for information or facility visits in connection with government investigations. CF representatives contacted by a government agency or requested to provide any information to a government agency should consult with the ExD and/or DoP to determine the appropriate response.

11. Compliance with laws, rules, and regulations

11.1. CF's policy is to comply with applicable laws, rules and regulations in the countries in which CF conducts operations. No CF representatives shall commit an illegal act, or instruct others to do so, for any reason. Further, utmost care should be exercised in ensuring that all statements, especially those made to governmental authorities that regulate CF's activities, are accurate and truthful. Questions regarding compliance with laws, rules and regulations should be directed to the ExD.

11.2. This section of the Policy should be read in conjunction with CF's Human Resources Handbook.

12. Duty to Report

12.1. CF representatives who suspect, or may be aware of, violations of this Policy should bring them to the attention of their direct supervisor, the DoP, ExD or the Chair of the Board as appropriate. The reporting person should have reasonable grounds for suspecting a violation and must do so in good faith. Knowingly reporting false or frivolous information is contrary to this Policy.

12.2. It is CF's policy to protect all CF representatives from reprisal, retaliation or other adverse action when reporting alleged violations of this Policy or other acts of fraud or corruption if such reporting is done in good faith and with reasonable grounds for suspicion.

12.3. All staff members, Board members and consultants are expected to comply with these policies in a manner consistent with the highest ethical standards. Failure to observe these policies may result in disciplinary action. Furthermore, violations of this Policy may also be violations of the law and may result in civil or criminal penalties.

12.4. This section of the Policy should be read in conjunction with CF's Human Resources Handbook.

13. Policy Review

This Policy will be subject to regular review by Senior management and approval by CF's ExD.

14. Communication

This Policy is available on CF's internal document management system and its website.