



CODE OF CONDUCT

VERSION: 4.0

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Policy Summary

Background	All FSD Africa Employees are expected to conduct themselves professionally and to the highest ethical standards. They are also personally and collectively responsible for maintaining these standards and expected to uphold the principles and values stated in this Code of Conduct.	
Related policies	<ul style="list-style-type: none"> • Safeguarding Policy • Anti-Bullying, Harassment and Violence Policy • Equity, Diversity and Inclusion Policy • Information Technology Policy • Finance and Expenses Policy • Privacy and Data Protection Policy • Occupational Safety and Health Policy • Security Policy • Travel and Entertainment Policy • Anti-Corruption Policy 	
Reviewers	HR Manager	Yes
	Legal	Yes
	ExCo	Yes
	Staff Consultative Committee	Yes
Approvers	Director HR and Talent Management	
	CEO	
	NRC	
Responsibilities and authorisations	<ul style="list-style-type: none"> • Board of Directors - approves the Code • CEO - ultimately responsible for its implementation. • Director HR and Talent Management - the owner of the Code • Managers and Supervisors - accountable for abiding by the provisions of the Code • FSD Africa Employees - compliance with the provisions of this Code 	

Document Control Ownership

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Approval History

Version:	4.0
Approved date:	14 September 2021
Previous version approved:	Nov 2019
Next review date:	September 2023
Approver:	NRC
Approver title:	NRC
Description of Changes from previous version:	<ul style="list-style-type: none"> - Introduced Clause under SCOPE to take care of an eventuality where an Employees hasn't signed the COC. - Introduced Clause 2(a-d). - Regrouped various clauses and sub-clauses into themes with sub-titles Introduced a section in Clause 3 to list and emphasise the specific policies that have a bearing on the Code of Conduct. - Added a section on Employee's obligation to health and safety under Clause 2 sub clause Health and Safety - Added a sub-clause under clause 2, to highlight the specific potential parameters under equity, diversity and inclusion - Included clause <i>f</i> on data protection - Included sub clause under clause 2 on conflict of interest and gifts - Added a sub-clause under clause 2 on safeguarding - Included sub under clause 2 on anti-corruption - Deleted email reference on reporting concerns and included clauses sub clause under clause 2 on reporting as a replacement - Deleted clause on where to get help and advice - Deleted the clause on 'International Aid Transparency Initiative and Freedom of Information as it doesn't fit into the COC, transferred to Disclosure Policy - Scope of the Code of Conduct. The CoC would need to be included in the board appointment documents, contracts, grant agreements etc in order to enforce the provision that it covers the Board NEDs.

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1. Introduction

FSD Africa strives to efficiently conduct all its activities to the highest ethical standards and comply with its legal obligations. It can only realise this through its Employees who must equally conduct themselves according to the highest standards of behaviour, in the most professional manner, and commit to perform their work to the best of their ability.

This Code of Conduct (Code) describes FSD Africa's ethical values and sets out the expected behaviour of all Employees and identifies provisions relevant to business conduct.

FSD Africa recognises its obligations towards its Employees, clients, suppliers, and all others with whom it interacts.

FSD Africa will fulfil its principles and Values.

Code of Conduct Scope

This Code shall apply to all Board Members, Committee Members and Advisers, Employees and associated Employees while engaged with work related to FSD Africa, including but not limited to the following: partners, grantees, consultants, volunteers, interns and contractors (together, "Employees").

Whether signed or not, this Code shall automatically form an integral part of all contracts of employment and conditions of service for all Employees. Failure to adhere to the principles contained in this Code or any policy applicable to their employment may be considered a disciplinary matter and in the case of grantees, consultants or contractors, may constitute grounds for termination of the relevant contracting arrangements

2. Implementation of the Code of Conduct

a) Employee's responsibility

FSD Africa Employees shall:

- i. Behave ethically in all aspects of their work, abide by the principles and standards in this document and all FSD Africa's policies. This Code, the contract of employment or service, policies and related guidance set out the expected standards.
- ii. Be aware that failure to adhere to the principles contained in this Code or any policy applicable to their employment may be considered a disciplinary matter.

b) Management responsibility

FSD Africa's management shall:

- i. Ensure that the standards outlined in this Code are met and that all Employees are aware of them.
- ii. Lead by example and be accountable and responsible for creating a culture and work environment that fosters compliance with the standards in this Code within their areas of authority.
- iii. Ensure the resources are in place to enable FSD Africa Employees to achieve the delivery of services according to its ethical values and vision.

3. Standards of conduct

FSD Africa's Employees will:

Integrity

- a) Uphold the integrity of FSD Africa by ensuring their personal and professional conduct, both online and offline, is consistent with FSD Africa's Values and standards and that all actions are driven by honesty and dedication.
- b) Observe local laws, meet all legal and financial obligations, and not take personal advantage of any privileges or immunities that have been conferred by FSD Africa.
- c) Use information, equipment, resources and funds of FSD Africa responsibly and avoid any form of misuse.
- d) Not act in any way that will likely bring FSD Africa into disrepute.

Information Disclosure

- a) Protect the confidentiality, privacy and security of sensitive organisational data and any personal data in their possession or control.
- b) Preserve the integrity, availability (only to authorised users) and confidentiality of information that Employees need to carry out their tasks/roles in line with the data protection policy.

Conflict of Interest

- a) Not allow any personal or private interest to interfere with their ability to do their job objectively or appear to compromise their decision-making independence.
- b) Disclose all existing relevant information about actual or perceived private or personal conflicts of interest at the earliest time possible and when circumstances change after an initial disclosure has been made or when new situations arise.
- c) Declare all gifts and hospitality that they accept from anyone with whom they, or FSD Africa, have a professional connection. Only gifts and hospitality that are given in line with the conditions set out in the anti-corruption policy may be accepted.
- d) Decline any honour, decoration, favour, gift, remuneration or hospitality which would put them in a position where they might reasonably be perceived by others to be or have been influenced in making a business decision as a consequence of accepting.

Safety and Security

- a) Avoid any unnecessary risk to the safety, health and welfare of self and others, including partners and all third parties.
- b) Comply with guidelines given by FSD Africa to safeguard the safety and security of Employees at the workplace.

Respect and Dignity

- a) Treat colleagues and anyone with whom FSD Africa has dealings with fairness, respect and dignity.
- b) Live by the values of equity, diversity and inclusion in all their work practices and ensure equal and fair treatment towards colleagues and all people with whom they interact.
- c) Not discriminate in relation to age, disability, nationality, ethnic, social or national origin, gender, sexual orientation, race, colour, economic class, language, religion, education, mental and physical health or cultural belief.
- d) Abstain from all acts which could be considered harassment, abuse, intimidation, bullying, discrimination or exploitation.

Sexual Abuse and Exploitation

- a) Not sexually harass, abuse or exploit any person regardless of circumstances and location, be it in FSD Africa premises or outside, including at social events, business trips, training sessions or conferences.
- b) Not engage in any sexual activity with persons (adult or child) that might benefit in any way from FSD Africa's assistance, or with any minor (persons under the age of 18 years), regardless of the age of majority or consent locally (mistaken belief in the age of a child is not a defence). Sexual activity includes all forms of activity and abuse of a sexual nature, with or without physical contact and whether or not either party is aware of such abuse.
- c) Not exchange money, employment, goods or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour.
- d) Not produce, procure, distribute or use pornographic material on FSD Africa's equipment, local area and wireless networks and premises, including reading/surfing pornographic websites or message boards or sending pornographic electronic mails.

Anti-corruption

- a) Not engage in any form of corruption and do everything possible to protect and ensure FSD Africa funds, assets or stocks are not diverted through fraud, theft, money laundering, terrorist financing or bribery.
- b) Not give, offer, promise, give, solicit or accept any advantage directly or indirectly through agents as an inducement to do something illegal or a breach of trust.

Raising concerns

- a) Promptly report any breach of this Code or malpractice in the workplace by others to the line manager or through the recognised confidential reporting systems without fear of reprisals.
- b) Inform third parties who FSD Africa is working with of this Code, including how and to whom they can report any misconduct or failure committed by FSD Africa Employees.

4. Related Policies

This Code should be read in conjunction with all the policies and procedures. More specifically, Employees' will adhere to the following policies and procedures that support this Code:

- a) Safeguarding Policy
- b) Anti-Bullying, Harassment and Violence Policy
- c) Equity, Diversity and Inclusion Policy
- d) Information Technology Policy
- e) Finance and Expenses Policy
- f) Data Protection Policy
- g) Occupational Safety and Health Policy
- h) Security Policy
- i) Travel and Entertainment Policy
- j) Anti-Corruption Policy
- k) Whistleblowing policy

5. Review of this procedure

FSD Africa reserves the right to amend the Code of Conduct from time to time. The Director, HR and Talent Management is responsible for updating the Code of Conduct.

The Code of Conduct will be approved by the CEO.

6. Code of Conduct Sign Off

I, confirm that I have read and understood this Code of Conduct and the related policies, and I agree to abide by its terms, which form part of the conditions of my employment/service with FSD Africa.

Name: _____ Signature: _____

Date: _____ Position/Title: _____

Once signed, please return this page to the Director of HR and Talent Management.

This Code of Conduct sign-off will be placed on applicable HR/Employees Personnel files.