



Stichting War Child

CODE OF CONDUCT

The Code of Conduct outlines the behaviour expected of all War Child representatives in their dealings with War Child employees, project participants, partners, donors, suppliers and anyone else they come into contact with, while acting as a War Child representative.

The Code of Conduct applies to **all** War Child representatives - including employees, interns, volunteers, members of the Management Team and Supervisory Board, consultants, service providers, partner organizations and their (staff) members, Ambassadors, accompanying family members and anyone else representing War Child in any capacity.

Together we create lasting impact and reach as many children as we can. This requires behaviour in line with our corporate identity and four Core Values: Creativity, Inspiration, Impact and Integrity.

Our Core Value "Integrity" forms the basis for our three 'Integrity Values' - **Accountable, Respectful and Transparent**. As War Child representatives, we act in line with these values at all times. We define our Integrity Values as follows:

ACCOUNTABLE

We want to bring about direct and lasting impact for our project participants. We do this by taking full responsibility for all our actions. This requires that we act in line with our Core Values at all times. Should that ever not be the case, we accept the consequences this may have and we learn from them.

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CODE OF CONDUCT

RESPECTFUL

We work towards a shared mission. We are a team. And as such, we treat everyone we encounter with respect. We also follow all security protocols, promote the wellbeing of our staff, protect sensitive information and never abuse our power.

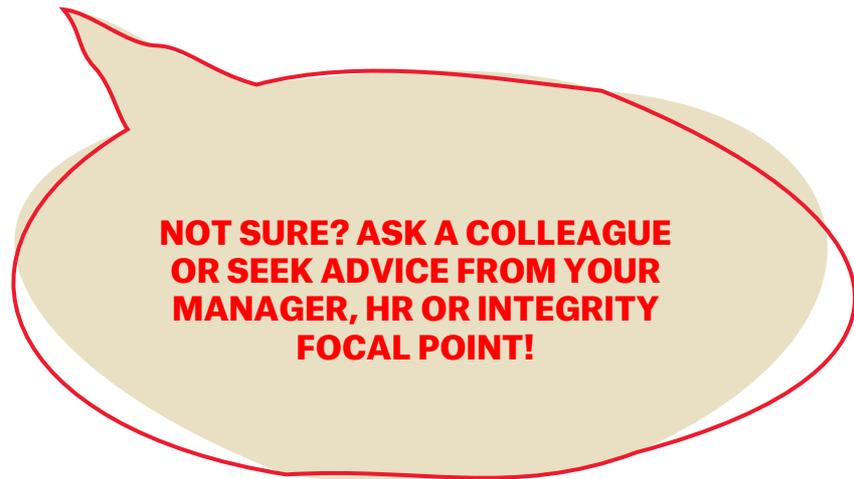
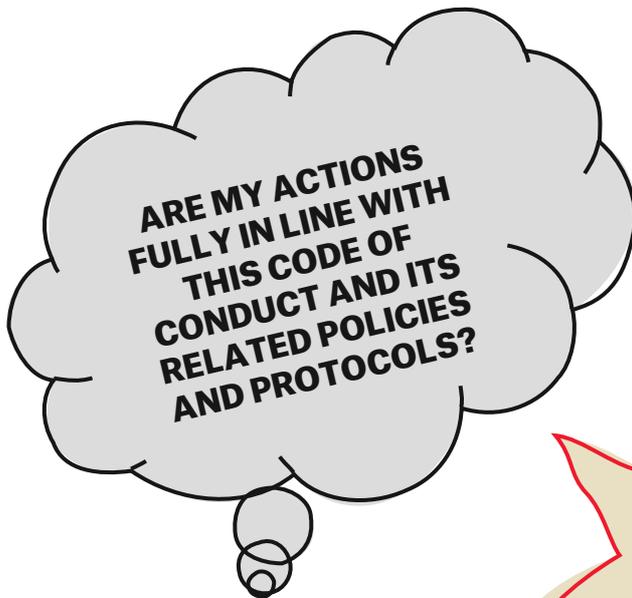
TRANSPARENT

We are transparent in the steps we take and the choices we make. There is nothing we want to hide. For this reason, we avoid conflicts of interest. And we commit to reporting all actual or suspected violations of our policies, including this Code of Conduct.

Any breach of this Code of Conduct will result in appropriate disciplinary action up to and including dismissal. War Child reserves the right to claim from representatives any damages caused by their breach of the Code of Conduct.

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IN EVERYTHING YOU DO, **ASK YOURSELF:**



Note: The examples outlined in this Code of Conduct are not exhaustive. There are other potential situations that War Child does not tolerate, of which no specific examples are stated in this document.

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ACCOUNTABLE

FOLLOW OUR POLICIES

You must read and comply with our organisational policies and procedures. Adherence to our Child Safeguarding Policy is mandatory to guarantee appropriate behaviour towards children.

Any breach of War Child policies can lead to appropriate disciplinary action. War Child reserves the right to claim from representatives any financial or non-financial damages caused by their breach of the Code of Conduct.

BE PROFESSIONAL

Representation: Be aware that you are representing the organization both during and beyond working hours and must therefore not indulge in any behaviour that may compromise the integrity or professionalism of War Child in any way.

Confidentiality: Be aware that all data and information you handle in your work is confidential and must not be shared with third parties.

Personal appearance: Wear clothes that are appropriate to the local context, are culturally sensitive and non-offensive, and observe personal hygiene, for the wellbeing of yourself and other people.

Smoking: Smoking is prohibited inside the premises of any War Child workplace – smoking may only be allowed in a designated area.

Alcohol and drug abuse: Substance abuse may negatively affect your health and performance at work, as well as your commitment to War Child and our project participants. Being under the influence of alcohol, drugs and/or other substances while carrying out your work or representing War Child is not tolerated.

Celebrations: Parties or informal get-togethers on War Child premises must first be approved by the (Country) Management Team. Moderate and limited consumption of alcohol at such events is only permitted outside working hours and upon prior approval by the Managing Director or Country Director. Note that alcohol consumption during working hours is not permitted.

Reputational risk: We all have a responsibility to protect the reputation of the organisation. This reputation could be damaged by any actions that are perceived to be dishonest, disrespectful, incompetent, inappropriate or not aligned with our values or organisational commitments. Any breach of our Code of Conduct could constitute a reputational risk for the organisation. Furthermore, contentious internal matters can very easily spread through (social) media. War Child does not tolerate conduct that may bring the organisation into disrepute.

Social media usage: We encourage you to use social media to share your ideas and your work with War Child, but please act appropriately. Be aware that anything you post on your personal social media could potentially reflect on War Child. A disclaimer that these are 'personal views' will not in any way prevent damage to our reputation. We have colleagues from different cultures who sometimes work in dangerous places. Don't put them at risk or alienate them because of your social media posts. When in doubt, ask the Communications and Advocacy team for advice. War Child does not tolerate any inappropriate use of social media by its representatives.

Gifts: Offering and accepting modest gifts or gestures of hospitality can represent a legitimate contribution to good business relationships. It is important that the reason for a gift is transparent and cannot be misunderstood and that it is consistently applied. Giving or receiving a gift should never impair the freedom or independence of either the giver or receiver. Gifts should be modest, of little financial value and, above all, merely of symbolic value. They should never be related to decision-making processes or to your own personal benefit. Gifts may only be offered after permission from your (Country) Director is granted. If you receive a gift, report it to your line manager. Gifts or donations that could be associated with parties that should be avoided (as per the Responsible Fundraising Policy) may never be accepted. As a War Child representative, you may never offer vouchers, cash or alcoholic substances as gifts.

WE ARE WAR CHILD!

PROTECT OUR PROJECT PARTICIPANTS

The Child Safeguarding Policy is to be adhered to at all times. If you have questions or doubts, ask your Child Safeguarding Focal Point or your line manager for advice.

You are obliged to report any suspected or witnessed violations of the Child Safeguarding Policy according to the Reporting Flow in the Child Safeguarding Policy.

War Child does not tolerate any violations of the Child Safeguarding Policy.

PROTECT OUR RESOURCES

All resources of War Child have the sole purpose of helping us to reach our project participants. They are not for the personal gain of War Child representatives.

You must treat War Child resources, whether material or intangible, with respect and care. These resources are designated for War Child work purposes only. Limited non-work related use of resources may be allowed as long as it does not interfere with the job, does not harm War Child in any way, and does not breach any principle or article of this Code of Conduct and its related policies and procedures. Such non-work related use must be explicitly authorised according to relevant War Child policies or the explicit granting of permission by an authorized person.

You must make every effort to protect all War Child property and assets - particularly those that are in your custody or control and are your responsibility. Any harm, loss or misuse of equipment should be reported to your line manager immediately.

Intellectual property is not to be used to misrepresent War Child. This includes our name, logo, copyright and other property (information, reports, etc.).

You should use your working hours to accomplish your objectives. Whilst War Child understands that sometimes situations occur in your personal life that will require your immediate attention, in general it is not acceptable to use your working time for private activities.

War Child does not tolerate any activities involving fraud, theft, corruption and / or bribery.

The Anti-Fraud Anti-Corruption Policy must be adhered to at all times.

USE THE INTERNET APPROPRIATELY

You are not permitted to visit any internet sites and/or chat rooms that are home to abusive content (such as pornographic, racist or discriminatory content, etc.), download offensive material or visit any sites that host illegal content. As a War Child representative, you are not permitted to use the e-mail system for spamming, sending messages of a bullying, pornographic, (sexually) harassing, racist, discriminating, insulting or offensive nature or any messages that (may) incite hate and/or violence.

ADHERE TO THE LAW

As an organisation, we believe it is vital we respect the laws and culture of the countries we work in. We expect you to familiarise yourself with and adhere to the laws of the country in which you are working / visiting. You are also expected to familiarise yourself with and respect the local culture, structures, beliefs, customs and common laws, as long as these do not contradict international human rights norms and humanitarian law. If in doubt, always talk to your line manager or HR.

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RESPECTFUL

CREATE A SAFE WORKING ENVIRONMENT

- ✓ We treat others with dignity and respect, act appropriately in all our dealings with people and recognise that others have the right to hold views which may differ from our own.
- ✓ We respect the cultures, norms, practices and traditions of all people and display cultural sensitivity to host communities and people in the countries where War Child works.
- ✓ We are inclusive and collaborative in our engagement with others, regardless of any individual differences. We do not disrupt the workplace or present obstacles to our colleagues' work.
- ✓ We do not make false or malicious allegations or accusations against others, and we treat any disagreement confidentially and in a sensitive manner.
- ✓ We display integrity and accountability and work to create a safe working environment for everyone.
- ✓ We are courteous in our dealings with others both inside and outside the organisation. We do not accept bullying or intimidating behaviour towards others.

War Child does not tolerate any behaviour that is humiliating, victimising, intimidating, bullying and / or discourteous.

PROTECTION FROM SEXUAL EXPLOITATION, ABUSE AND HARASSMENT (PSEAH)

War Child recognises that all War Child representatives and project participants have a right to be treated with dignity and respect - and we are therefore committed to the protection of all vulnerable groups. Therefore, any proven instances of harassment, exploitation, abuse or threat of abuse will be treated as **gross misconduct** and, as such, will result in appropriate legal action as well as disciplinary action, up to and including dismissal.

As a War Child representative, you must adhere to the following principles:

- ✓ Acts of sexual exploitation and abuse by humanitarian workers constitutes gross misconduct. This includes, but is not limited to, gender-based violence.
- ✓ Any sexual activity with children (persons under the age of 18) is prohibited regardless of the local age of maturity or age of consent. Any mistaken belief in the age of a child is no defence.
- ✓ 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 the exchange of sex for assistance that project participants are entitled to.
- ✓ Sexual relationships between War Child representatives and project participants are prohibited. This is because they are based on inherently unequal power dynamics. Such relationships undermine the credibility and integrity of the work that we do.
- ✓ Sexual relationships between War Child representatives and members of the communities where War Child works are strongly discouraged. Such relationships undermine the credibility and integrity of humanitarian aid work. Should a relationship somehow develop, the War Child representative is expected to make this known to his or her line manager, who will then, together with the Country Director, determine if the current work arrangement is appropriate and/or if measures need to be taken. Based on the circumstances, it could be decided that such a relationship represents gross misconduct due to abuse of power. If the relationship is considered permissible, this will be discussed and documented in the personnel file of the War Child representative.
- ✓ War Child representatives are obliged to create and maintain an environment which prevents sexual exploitation and abuse and promotes the implementation of this Code of Conduct.

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Managers at all levels have a particular responsibility to support and develop systems which maintain this environment.

If you have any concerns or suspicions regarding sexual abuse or exploitation by a War Child representative, you must always report such concerns via the Speak Up! Procedure.

SEX TRAFFICKING

As a War Child representative, you must not engage in any form of people trafficking.

TREAT EVERYONE EQUALLY

At War Child, we expect you to treat everyone equally, regardless of personal characteristics. These characteristics encompass age, disability, gender reassignment, marriage/civil partnership, race, pregnancy/maternity, religion/belief, sex and sexual orientation.

TREAT EVERYONE WITH RESPECT

War Child does not tolerate discrimination, harassment, sexual harassment or bullying based on any of the characteristics in the EU Charter of Fundamental Rights, Chapter 3 as well as on any other characteristics including but not limited to weight, dress etc.

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DO NOT ABUSE YOUR POWER

You must not abuse your power or position - whether your advantage is hierarchical, financial or based on any other power dynamic - for any form of personal or professional advantage.

The abuse of power, where a power difference exists between yourself and another person, using coercion or threats to engage the other person in activities that breach this Code of Conduct and its related policies and procedures is unacceptable. Any actions to obtain a personal or professional advantage over another individual are also unacceptable.

War Child does not tolerate exploitation or abuse of power of any kind, including sexual exploitation, of any individuals, whether employees, volunteers, interns, partners, children or project participants.

STAFF RELATIONSHIPS

If you enter into a romantic relationship with another staff member or a staff member of a partner organisation (or any other organisation or institution directly involved with War Child), you must discuss this and any possible implications for the organisation / programme with your direct line manager (or the next in line in the event it concerns a relationship with your line manager) as soon as possible.

PROTECT SENSITIVE INFORMATION

We deal with very sensitive information, including staff data, children's personal data (including images and stories), internal reports etc. You need to treat this information confidentially and ensure that you do not share it with inappropriate sources that could potentially harm our people, our programmes and / or the integrity of the organisation as a whole.

As a representative of War Child, you need to respect and protect personal data that you come across in your daily work. Before signing this Code of Conduct, make sure that you read and understand the "Do's and Don'ts on GDPR", the "Introduction on Personal Data Protection" as well as our Privacy Statement. Talk to your line manager during your first working days to understand the implications of personal data protection on your role and have a look at [Privacy@Work](#) to find the documents referred to above and more relevant information. War Child does not tolerate any behaviour that exposes sensitive data and information to the public.

WORKPLACE HEALTH AND SAFETY

We promote the health, safety and wellbeing of our staff members. You are responsible to ensure that you are fit to work, and that you follow appropriate health and safety standards. We expect that all staff members promote a healthy work environment and report any incidents or risks immediately.

War Child does not tolerate any behaviour that puts others at risk of physical or psychological injury.

FOLLOW ALL SECURITY PROTOCOLS

Security and safety starts with you. Always be security aware and understand that your actions and behaviour have a significant impact on security matters. Ask your line manager if you don't understand anything, report incidents and speak up if you feel improvements need to be made. You must always comply with the organisational Security Policy and Security procedures specific to the country you visit or work in. Behaviour that puts War Child people and/or others at risk is unacceptable and irresponsible. Following security protocols is mandatory.

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TRANSPARENT

AVOID CONFLICTS OF INTEREST

We do not accept any personal, financial or other conflicting interests that may compromise your capability or willingness to perform your work.

A conflict of interest may arise where the impartial and objective exercise of your function is compromised for reasons involving personal relationships, emotional considerations, political beliefs, national affinity, economic interest or any other interest. In the event an action undertaken by you represents a potential conflict of interest, you shall refrain from carrying out that action. You should refer the matter to your line manager, who will evaluate and confirm in writing whether or not a conflict of interest exists.

Where a conflict of interest is found to exist, the risk associated with the conflict must be assessed by a third party and mitigating measures must be taken.

MANAGE OUTSIDE ACTIVITY

If you want to work (paid or unpaid) in any way beyond your commitments to War Child, you must request up-front written approval from your line manager. The activity should not be in contradiction to War Child's values and activities nor negatively affect your ability to carry out your normal work.

SPEAK UP!

You have an **obligation to report** actual or suspected violations of this Code of Conduct and its related policies and procedures. You can report via the different channels outlined in our Speak Up! Procedure.

All signatories are required to cooperate with all internal and external investigations, as well as donor audits. This includes attending all necessary meetings, answering all questions accurately and fully, and maintaining the confidentiality of the investigation. You may not obstruct, hinder or delay any internal investigation in any way. The obligation to cooperate may extend to providing truthful information as part of legal proceedings and investigations involving War Child or its representatives.

War Child does not tolerate any form of intimidation or retaliation against any War Child representative who makes a report regarding any possible violation of this Code of Conduct or who provides information or assistance in an investigation. War Child has a Speak Up! Procedure in place that outlines all reporting channels as well as the consequences of breaches of this Code of Conduct.

If any breach of the Code of Conduct relates to a child, the Child Safeguarding Policy must be consulted and adhered to.

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CLARIFICATION OF TERMINOLOGY

Clear definitions are essential to ensure that the proper reporting of, and responses to, instances of abuse or exploitation can be handled in a consistent manner. This section provides War Child's definitions of the terminology used in this Code of Conduct. In addition, War Child representatives are also bound by the local laws of the countries in which they work.

Bullying is repeated inappropriate behaviour, direct or indirect, whether verbal, physical or otherwise, conducted by one or more persons against another or others, which could reasonably be regarded as undermining the individual's right to dignity. Examples of bullying include:

1. **Manipulation** of the victim's reputation by rumour, gossip or ridicule.
2. **Preventing** the victim from speaking by making repeated vocal criticisms or obscenities.
3. Social **exclusion** or **isolation**.
4. Manipulating the nature of the work or the ability of the victim to perform the work e.g. by **overloading, withholding information** or **setting meaningless tasks**.
5. Physical **abuse** or **threats of abuse**.

Bribery is the offer, promise, giving, acceptance or soliciting of money, gifts or other beneficial items as an inducement to do something that is illegal or a breach of trust in the course of carrying out an organisations' activity.

Child: A person under the age of 18 years.

Corruption is the abuse of entrusted power for private gain.

Exploitation: Exploitation is using one's position of authority, influence or control over resources, to pressure, force or manipulate someone to do something against their will. Exploitation encompasses threats to withhold project assistance, threats to make false claims about a person in public, or any other negative repercussions in the work place or community. Examples of exploitation can include:

- Offering special benefits to project participants or War Child representatives in exchange for expressed, implied or demanded (sexual) favours.
- Threats or insinuations that an individual's refusal or unwillingness to submit to any demands will affect that person's entitlement to project assistance and support, or terms and conditions of employment.

Fraud is the wrongful or criminal deception by an individual with the intention of obtaining any personal gain, either directly or indirectly and immediately or later. Fraud is defined as the actual or attempted use of deceit, falsehood, or dishonest means to secure a personal benefit, and includes fraudulent conduct, corrupt conduct, forceful conduct and obstructionist conduct.

Harassment: Harassment is any action or conduct - including spoken words, gestures or the production, display or circulation of written words, pictures or other material - where the action or conduct is unwelcome to the recipient and could reasonably be regarded as offensive, humiliating or intimidating.

Examples of harassment include:

- verbal harassment, jokes, comments, ridicule or songs
- physical harassment including jostling, shoving, or any form of assault
- intimidating harassment including gestures, posturing or threatening poses
- visual display such as posters, emblems, or badges
- isolation or exclusion from social activities
- pressure to behave in a manner that the War Child representative or project participant thinks is inappropriate - for example, being required to dress in a manner unsuited to a person's ethnic or religious background.

Intimidation: to frighten or threaten someone, usually in order to persuade them to do something that you want them to do.

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Retaliation: the action of harming someone because they have harmed oneself. This typically is defined as an act of revenge.

Sexual harassment is defined as any:

- ✓ Act of physical intimacy
- ✓ Request for sexual favours
- ✓ Any other act or mode of conduct - including spoken words, gestures, or the production, display or circulation of written words, pictures or other material - that is unwelcome and could reasonably be regarded as sexually offensive, humiliating or intimidating.

Examples of sexual harassment can include:

- a) **Verbal abuse:** requests or demands for sexual favours, suggestive remarks, degrading abuse or insults, jokes or tricks of a sexual nature.
- b) **Physical abuse:** gestures of a sexual nature, unnecessary touching, indecent exposure, and assault.
- c) **Visual abuse:** displaying/circulating pornographic materials.
- d) Any single incident can be regarded as an act of sexual harassment. Sexual harassment can be imposed by anyone upon anyone, regardless of gender and can include harassment of a person due to sexual orientation or preferences. Instances of sexual harassment will be treated as gross misconduct and may result in dismissal.

Staff member: anyone who has an employment, volunteer or internship agreement with War Child

Theft encompasses a variety of instances including: Theft of funds or any possessions that belong to War Child or any other organisation or person involved with our mission; Unauthorised use of and/or possession of War Child property - or of the property of a third party while acting or purporting to act on behalf of War Child; Serious negligence or deliberate misuse of War Child property; Any attempt to steal or misuse the property of War Child or any other organisations or people involved with our mission; Unauthorised absence without due cause, or persistent absence or bad time keeping.

People Trafficking: this encompasses the recruitment, transportation, transfer, harbouring or receipt of persons, by means of threats or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs; (From: Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime, 15 November 2000).

Violence: Violence constitutes incidents where persons are abused, threatened or assaulted in circumstances related to their work, involving an explicit or implicit challenge to their safety, health or wellbeing.

War Child representative: this term covers all employees, interns, volunteers, members of the Management Team and Supervisory Board, consultants, service providers, partner organizations and their (staff) members, ambassadors, accompanying family members, as well as anyone representing War Child in any capacity.

DECLARATION AND SIGNATURE

You are required as a condition of War Child employment and/or representation, to sign the declaration of commitment appearing below on an annual basis:

By signing this Code of Conduct, I declare to have read it in full and understood its intention, implication, and possible consequences. If I have a question about any aspect of this Code of Conduct or its related policies and procedures and their potential implications for me, I will discuss it with my line manager and/or HR. With my signature I also attest that I have read, understood and will adhere to the following policies and procedures that support this Code of Conduct.

Child Safeguarding Policy

Anti-Fraud and Anti-Corruption Policy

Global Security Policy

Informed Consent Policy Form

Do's and Don'ts GDPR

Introduction on Personal Data Protection

Privacy Statement

Signature

Date

Printed Name

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