

The Development Fund's Code of Ethics



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1 Introduction

Purpose

The Development Fund's "Code of Ethics" (The Code) is intended to assist and guide us in behaving with integrity and in making ethically sound decisions, while acting competently and responsibly within all areas of The Development Fund's work globally.

The Code helps us to put the organisation's values into practice, and to safeguard against misuse of authority in all ways. The Code reminds us to treat beneficiaries and stakeholders with respect, guides how we behave towards each other and how we manage tangible and financial resources.

All cooperation and work taking place under the auspices of The Development Fund shall be imbued with respect for human rights, for the laws, culture and religion of other countries, and with zero tolerance for corruption and abuse of power, including sexual exploitation, abuse and harassment.

The host country's laws, culture and religion shall be respected, to the extent that this does not conflict with international standards of human rights.

The Guidelines are not exhaustive and must be supplemented with personal judgment and respect for others in one's work for The Development Fund.

Scope

The Code applies to our employees and others who in various contexts represent the organisation. All Development Fund personnel are ambassadors of the organisation and must act as such.

Employees must be conscious of the fact that they may be considered representatives of The Development Fund even outside working hours and in private situations. The same goes for guests one brings along on journeys, volunteers and suppliers of services.

All employees shall follow the articles of their employment contracts and job descriptions, and of handbooks for staff.

2 Corruption

Corruption is defined by The Development Fund as all abuse of power, money or position for illegitimate personal or group benefits.

This includes all forms of ethical corruption, whether financial (for example bribes, embezzlement, extortion, kickbacks and fraud) or other forms of personal benefit or pleasure.

It also covers all forms of nepotism and illegitimate favouritism of groups or employees based on ethnicity, religion, gender, sexual orientation, political affiliation or other identity.

This list is not exhaustive and does not mean that something not listed here is allowed.

3 Partnership and cooperation

Partners are defined as organisations and other collaborators with which The Development Fund has binding cooperation of a certain financial scope, or cooperation that for other reasons is important for the organisation's purpose. The Development Fund is committed to strive for inclusive and open relations with all its partners, and to maintain well-organised and well-understood collaborative arrangements, distinguished by mutual respect and tolerance. Employees must be conscious that The Development Fund often is the financially stronger party in these relations, and that this may influence cooperation and power relations, and thus also the potential for abuse of power.

Before establishing new partners or collaborators, The Development Fund performs an integrity assessment of the potential partner/collaborator. The Development Fund partners with organisations that know the challenges and opportunities in a geographically or thematic area, have shared goals with us and fit within our objectives. We engage in partnership with organisations that work to combat disempowerment and focus on building long-lasting capacity among the programme participants. We do not enter into partnership with organisations that violate international norms or whose work, vision and activities may undermine the overall goals The Development Fund are working for.

In order to secure objectivity in decision-making, The Development Fund does not permit personal relationships between its own staff members and partner organisations' employees.

4 Behaviour towards members of the community

Employees are expected to:

- Treat others as you would like to be treated yourself.
- Seek to know about power hierarchies in the community.
- Behave respectfully towards all employees of the partner organisation regardless of their position, sex, age and religion.
- Not intervene in partner organisations' internal affairs without the consent of the partner organisation. Exceptions are cases of misuse of power, misconduct, misuse of funds and other issues that are antagonistic to the basic values of the partnership.
- Show respect for the religious beliefs, customs and habits of the population, and conduct himself/herself accordingly.
- Behave respectfully towards people of the local population regardless of their position, sex, age and religion.
- Take photos discreetly and not without the consent of specific persons being portrayed.
- Not overindulge in alcohol when representing the organisation.
- Seek advice and information on local customs regarding dressing and behaviour, dress and behave in a manner appropriate to the assignment and avoid giving any impression of having military status.
- Make no use of prostitutes. Prostitution is widespread in destitute countries where there is social need. It is in direct contravention of The Development Fund's values to take advantage of this situation.
- Observe strictly local laws and regulations, including those governing security, traffic regulations, and currency exchange.
- Not make use of, or at any time have in his/her possession any weapons. The exception is a knife as a regular travel kit.
- Not use any illegal drug by the country's or Norwegian law, nor involve in situations where such drugs are being used. Exceptions are personal use of medicines prescribed by doctors.

Challenging contexts

In conflict situations like war, internal disorder, and various states of emergency, the employees may run risks which should not be underestimated. Employees should therefore exercise the moderation and discipline called for by the prevailing circumstances.

5 Behaviour towards colleagues

All employees are expected to:

- Practice a zero tolerance approach to harassment of colleagues.
- Apply the attitude through their daily work that all staff-members are equally important.
- Apply an attitude of constructive, matter-oriented discussion on any issue being brought up by any other staff.
- Not allow criticism or disagreement to affect decision-making or ways of working.
- Contribute to the resolving of conflicts between staff members with an open, honest and fair attitude.
- Be ready to give understanding and support to any other staff in need of such care.
- Respect and stay loyal towards decisions made through regular organisational practice in the organisation, including rules and responsibilities of the participation of employees.
- Abstain from undertaking any public, professional or commercial activities other than those connected with the assignment unless prior permission from the Secretary-General of The Development Fund.

6 Security

In countries of higher security risk, employees are expected to:

- Keep their office well informed of his/her movements and not leave the country of assignment or take local leave without permission from the Secretary-General/Country Director or Head of Department.
- Not publish articles or research findings related to the mission without prior clearance from one's superior.
- Not travel in vehicles driven by individuals under the influence of alcohol.

7 Equal opportunity

At The Development Fund, we are committed to providing an equal opportunity workplace, where hiring and development are based on competence, experience, achievements and potential of each individual. We take the different starting points into account to ensure a fair outcome for all (equity). We do not allow discrimination where an individual or a group of individuals are considered less eligible based on their national origin, union membership, ethnicity, race, religion, age, gender (including pregnancy), sexual orientation, gender identity, marital status, mental or physical ability, etc., without this list being considered exhaustive.

8 Sexual exploitation, abuse and harassment (SEAH)

The Development Fund's commitment to personal integrity and mutual respect between employees means that we do not accept improper behaviour, sexual exploitation, abuse or harassment of any kind. It also demands that all employees and partners are informed and reminded of this at appropriate intervals.

In The Development Fund it is expected that everyone will be met with respect and will not experience harassment of any kind. Asymmetrical power relations may represent a challenge for organisations such as The Development Fund and our cooperation partners, where access to money and influence due, for example, to age or position may open opportunities for improper behaviour.

The Development Fund defines harassment, sexual exploitation, sexual abuse and sexual harassment as follows:

- Harassment: acts, omissions or statements that have the purpose or effect of being offensive, frightening, hostile, degrading or humiliating.
- Sexual exploitation: Any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.
- Sexual abuse: The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
- Sexual harassment: Any form of unwanted sexual attention that has the purpose or effect of being offensive, frightening, hostile, degrading, humiliating or troublesome.

Harassment may be a gesture, or it may be verbal, physical, visual, or written. Instead of isolated behaviour, harassment is an escalation of repetitive and pervasive conduct. However, don't ignore isolated behaviour that makes you feel uncomfortable.

The Development Fund has employees in Norway and in the programme countries in which the organisation works, and in addition cooperates with consultants and local organisations. Development Fund employees are expected to be sensitive of cultural taboos, especially in the context of encouraging the raising of concerns about SEAH within the community.

9 Drugs and alcohol

You shall not be under the influence of intoxicating substances during working hours, while on The Development Fund premises, while conducting business on The Development Fund's behalf, or at any social events sponsored by The Development Fund outside regular working hours. However, reasonable amounts of alcohol may be served when local custom and the occasion makes it necessary to avoid causing insult.

The strictest interpretation shall be the basis for evaluating what is reasonable and appropriate. This exception will never allow you to drive, operate machinery or conduct business on The Development Fund's behalf while under the influence. This applies even for intoxicating substances prescribed by a doctor. While drinking, you must not encourage others to drink, behave in a manner that places you or The Development Fund in an unfavourable light, places anyone in jeopardy, or causes discomfort or offense.

10 Potential conflicts of interest and gifts

Personal interest

Employees shall fulfil their duties in a spirit of loyalty to the values, purpose and decisions of The Development Fund. It is important that everyone is aware of the fact that private relations and circumstances must be kept separate from the organisation. In the event of personal relations being evident in processes of recruitment, procurement or other decision making, the potential conflict of interest shall be disclosed and dealt with openly. All pertinent considerations and conclusions shall be documented.

Employment outside The Development Fund shall be cleared with one's immediate superior.

Gifts received from outside the Development Fund

In the event that individual staff members receive gifts from partners as expressions of good cooperation and partnership, the individual is responsible for not accepting gifts and/or services that may be perceived as attempts at bribery or reward for favours or decisions.

Valuable gifts received by employees in connection with their work are considered the property of The Development Fund. All gifts received are to be brought to the attention of the Senior Management Team at The Development Fund and may be offered as prizes for staff competitions or lotteries.

Gifts to partner organisations or programme participants

Gifts to partner organisations shall be kept on a modest level. Individual staff are responsible for ensuring that the cost level of gifts is not perceived as extravagant or as bribes or palm greasing. Gifts to third parties must be approved by the Head of Department or Country Representative in advance.

11 Misuse of tangible and financial resources

Zero tolerance

The Development Fund practices zero tolerance for misuse of tangible and financial resources. This translates into the expectation that employees:

- Practice zero tolerance towards any form of misuse of the organisation's funds and tangible assets.
- When on contract or engaged on a mission for The Development Fund, in all countries, show necessary discretion and caution to political or military matters in countries where The Development Fund operates. This applies to official and private communications, including conversations, telephone calls, radio messages, letters, e-mails and other electronic communication.
- Act with loyalty to The Development Fund's Code, policies, guidelines and contractual obligation.

Advocating The Development Fund's standpoint

The Development Fund will actively promote its anti-corruption policy and related documents to all employees, partners, donors and suppliers. The Development Fund will actively present and discuss this policy in relevant forums The Development Fund takes part in.

The Development Fund's cooperating partners are expected to have similar policies approved and in use.

Formal commitment in writing

Every employee shall commit to this anti-corruption policy through signing the confirmation pertaining to the Code, thereby confirming that he/she has read and understood it.

The signed declaration will be kept in the personnel folder of each staff member.

Training

New employees of all The Development Fund offices will be given training in

existing anti-corruption policies and practices during their inception phase.

Existing employees of all The Development Fund offices will be given refresher courses every two years.

Partners are expected to offer such training to all employees. The Development Fund will plan to provide partners with capacity building in anti-corruption, and training on a regular basis.

Mainstreaming anti-corruption in management procedures

The Development Fund management must ensure the development of systems, structures, practices and culture that promotes trust and eliminates corruption.

Anti-corruption work will be mainstreamed in all management procedures.

12 Suppliers of goods and services

Suppliers are expected to commit to working practices that demonstrate respect for human rights, for the laws, culture and religion of other countries, and with zero tolerance for corruption and abuse of power, including sexual exploitation, abuse and harassment.

13 Raising concerns and complaints

If you have concerns about situations that may constitute a breach of The Code, you are strongly encouraged to report these concerns. Anyone affected by our work or the projects we support are encouraged to raise concerns, including (but not limited to):

- Employees
- Consultants and others directly involved in the organisation
- Our partner organisations
- Institutional/individual donors
- Supporters and stakeholders

The following are suggested channels for informing The Development Fund of known or suspected breaches of The Code of Ethics, which encompasses misuse of authority in any way:

- Speak to an employee of The Development Fund
- Write to the email address of an employee of The Development Fund

- Submit information into the suggestion box at The Development Fund office in a programme country
- Write a letter and send in the post to The Development Fund
- Use the electronic mechanism accessed through this link:

[Raising concerns and complaints at The Development Fund](#)

More guidance is provided in Annex 1: Concerns and Complaints Raising Policy.

14 The Development Fund's response

Upon receiving concerns or complaints through any means of communication, The Development Fund shall take the information seriously, and shall:

- Keep it strictly confidential
- Consider pausing fund flow, weighing up consequences for all stakeholders
- Investigate carefully, objectively and without prejudice
- Enable both those raising concerns and those accused to provide information
- Consider findings specifically and in a greater context
- Enact sanctions proportionate to the findings
- If findings indicate criminal actions, consider informing the police
- Keep relevant donors informed from an early stage

The Development Fund may decide to halt the financial support while investigations are ongoing. The Development Fund will notify any other donors to the affected programme or project, and The Development Fund will strive to coordinate actions with other donors.

Further information is provided in Annex 1: Concerns and Complaints Raising Policy.

15 Consequences of breaches

Depending on the results of investigations, The Development Fund will consider the proportionality of sanctions before deciding on the correct measure.

For criminal offences, or allegations thereof, The Development Fund will consider notifying the police with relevant jurisdiction and collaborate with the investigation. For civil breaches, The Development Fund will consider engaging

legal advisers and take further action.

The Development Fund will identify lessons learned and how best to demonstrate to a wider audience its standpoint on behaviour against its values.

Further information is provided in Annex 1: Concerns and Complaints Raising Policy.

16 Review and updates

This Code will be subject to a review on an annual basis. A review may result in improvements, or it may conclude that no changes are necessary. If a revision of the Code is deemed necessary and executed, all employees will sign the updated version.

17 Annexes

Annex 1: Concerns and Complaints Raising Policy

The Development Fund's Concerns and Complaints Raising Policy

1 Introduction

The Development Fund's "Code of Ethics" (The Code) is intended to assist and guide us in behaving with integrity and in making ethically sound decisions, while acting competently and responsibly within all areas of The Development Fund's work globally.

The objective of the Concerns and Complaints Raising Policy is to increase the possibility that breaches of The Code are brought to the attention of The Development Fund and that action is taken to close gaps and identify needs for training of staff members.

2 Main channels

All persons (internal and external)

All individuals with a relation or contact with The Development Fund are encouraged to raise any concerns about an interpretation, application or suspected violation of the Code of Ethics with employees of The Development Fund with whom they have normal contact.

If any individual wishes to raise concerns about an interpretation, application or suspected violation of the Code of Ethics but are not comfortable raising the concern directly with The Development Fund staff that they are in normal contact with, The Development Fund encourages all individuals to bring the matter to the attention of senior management or other staff of The Development Fund.

The Development Fund organises its programme work to enable contact possibilities with as wide a range of staff members at the Development Fund as possible, within the frames of cost efficiency, so that concerns may be raised with different persons at The Development Fund.

The Development Fund Country Offices will be looking to place locked "suggestion boxes" at safe locations to enable ease of access to communication with the organisation.

This channel will enable the communication of concerns and complaints

anonymously.

Development Fund Staff

Concerns about an interpretation, application or suspected violation of the Code of Ethics should normally be brought to the attention of the line manager in person, by mail or other practical means. If there are reasons not to contact the direct line manager, or the person raising the concern is external to The Development Fund, the following online mechanism should be used:

[Raising concerns and complaints at The Development Fund](#)

According to the Norwegian Working Environment Act, employees in Norway may also report to The Development Fund's safety delegate.

Accountability

In case an individual or group has concerns about an interpretation, application or suspected violation of the Code of Ethics at DF Oslo, raising such concerns directly with pertinent donors is completely understood and encouraged.

3 Reacting to a breach

Responsibly and confidentially

The following basic principles shall be applied uniformly when complaints are processed:

- All complaints shall be taken seriously.
- Development Fund staff and managers receiving a concern or complaint shall always ensure that it is followed up in a responsible way.
- The information shall be channelled to the **"Contact persons of confidence"** in The Development Fund. These persons are established by the Board once a year.
- Complaints shall be treated confidentially. This will mean, among others, that disclosure of the identity of the individuals raising the concern or complaint, whom the issue relates to and the individual(s) that are subject to the concern or complaint, shall be limited to what is necessary for responsible action.

Contact persons of confidence

- "Contact persons of confidence" (Norwegian: "varslingsutvalget") in The Development Fund will be selected by the Board once a year. They may be selected from Board members, staff in Norway or internationally, and external persons with pertinent competence.
- The Contact **persons of confidence** shall ensure:

- To register the concern in a pre-defined overall register for The Development Fund globally
- To draw up a log for each case received, stating all actions taken and key developments in the case, referring to documents that contain details as necessary
- Archiving of the register, the log and other case documents confidentially and securely
- To send confirmation to the person(s) raising the concern or complaint as soon as possible that the information has been received and is being followed up carefully
- To enquire whether the individual(s) raising the concern or complaint would avail themselves for interview, whether the initial concern or complaint was raised anonymously or by a named person(s)
- To enquire whether the individual(s) raising the concern or complaint would like any further updates
- If further investigation of a complaint is initiated, the person(s) accused shall be informed of the report and the allegations it contains. The accused shall be given the opportunity to present her or his view of the case, and to receive assistance from a trusted representative.
- In cases where this is necessary for the purpose of police investigations, the person(s) accused shall not be informed of the report.

Anonymous and confidential

The Development Fund will treat all concerns confidentially, both concerns raised by persons where the contact details are known and when the information is submitted anonymously.

Fear for reprisals, for one's own safety or how the organisation will react are the main reasons for raising concerns and complaints anonymously. The Development Fund would be better enabled to make progress with action when it can make contact with individuals or groups who have raised the concern or complaint in order to get specific information to investigate.

Support to complainants and those subject to misconduct

All individuals who report genuine concerns will be properly followed up, protected and supported, as far as realistically possible.

The Development Fund will prioritise:

- Support and assistance to programme participants and other stakeholders who are subject to unethical behaviour or misuse of authority or if others have observed such situations in connection with work of The Development Fund

- Support and assistance to employees who are exposed to incidents which they themselves experience as offensive, or to harassment, threats or abuse during assignments or at events carried out under the auspices of The Development Fund

Protection for those raising concerns

The Development Fund has zero tolerance to any form of retaliation against those raising alerts or complaints (“whistleblowers”). No one shall be discriminated against or disciplined or reprimanded for reporting concerns or requesting guidance concerning the Code of Ethics.

4 Investigation

Investigation of concerns and complaints

In any situation where there are grounds for suspicion of breach of The Code of Ethics and Policy Against Misuse, which encompasses misuse of authority in any way, The Development Fund shall immediately, though carefully, take action in order to uncover the facts and whether irregularities have occurred.

The Development Fund may decide to halt the financial support while investigations are ongoing. The Development Fund will notify any other donors to the affected programme or project, and The Development Fund will strive to coordinate actions with other donors.

Key principles regarding investigations of concerns and complaints

- The purpose of conducting an investigation is to gather evidence and facts to establish whether suspicions or allegations are true, and whether any proven incidents are isolated or more widespread.
- All investigations should be impartial, thorough, timely and confidential. Any relevant persons investigated will be considered innocent until proven guilty.
- Investigations may be done internally by The Development Fund’s own staff or be carried out by a professional third party.
- Investigators should be objective and unbiased, thorough, able to maintain confidentiality, competent in investigative techniques, empowered with sufficient seniority and confidence, honest persons of integrity, and independent of any possible subsequent disciplinary process.
- A formal documented investigation report should be submitted to The Development Fund according to the timing agreed, which outlines the findings, facts and conclusions of the case.
- The investigation report should make recommendations about weaknesses.

Information to person(s) subject to concern or complaint

If the investigation does not conclude in grounds for further action, and the person accused of breach of The Code has already been acquainted with the report, both the complainant and the accused shall be informed about the closure of the case. This information shall be given as promptly as possible, and in such a way that the accused may feel free from suspicion. If the accused has not been informed of the report and no blameworthy conditions have been discovered, it is in principle not natural that he or she be given information about the closure of the case.

5 Consequences of breaches

Depending on the results of investigations, The Development Fund will consider the proportionality of sanctions before deciding on the correct measure.

For criminal offences, or allegations thereof, The Development Fund will consider notifying the police with relevant jurisdiction and collaborate with the investigation.

For civil breaches, The Development Fund will consider engaging legal advisers and take further action.

All parties without an employment contract with The Development Fund

Persons may be in the form of partner organisations, suppliers of goods or services or other third parties.

Potential sanctions would include one or several of the following:

- Contractual termination
- Claim for repayment or non-monetary compensation if appropriate
- Compensation for a third party (persons or groups) that were subject to behaviour by the investigated partner organisation
- Repayment of funds in the case of financial misuse being reported by the investigation

Development Fund Staff

Any breach of the Code of Ethics will result in disciplinary action in accordance with the respective Development Fund terms, conditions and guidelines.

Sanctions may comprise of one or several of the following:

- Warning in writing
- Dismissal
- Monetary repayment
- Change of responsibilities

Neither of the above lists are exhaustive; The Development Fund does not exclude

the possibility of sanctions being in another form than listed above.

6 False or malicious accusations

False accusations on any action, purposely made by a staff member, are seen as a breach of the Code of Ethics and will be subject to disciplinary action at the discretion of the employer.

7 Other stakeholders

For any breach or allegation of breach or offence that involves funding or coordination from donors, or through partners or stakeholders, The Development Fund will notify the donors and partners immediately.

8 Summary of main channels

The following are suggested channels for informing The Development Fund of known or suspected breach of The Code of Ethics, which encompasses misuse of authority in any way:

- Speak to an employee of The Development Fund
- Write to the email address of an employee of The Development Fund
- Submit information into the suggestion box at the Development Fund office in a programme country
- Write a letter and send in the post to The Development Fund
- Use the electronic mechanism accessed through this link:

[Raising concerns and complaints at The Development Fund](#)

9 Review and updates

This policy will be subject to a review on an annual basis. A review may result in improvements, or it may conclude that no changes are necessary. If a revision of the policy is deemed necessary and executed, all employees will sign the updated version.