



## CODE OF CONDUCT

The Board adopted Civil Rights Defenders' Code of Conduct on 24 February 2015.  
Revised August 25, 2015.

### 1. Introduction

Civil Rights Defenders is an international human rights organisation defending people's civil and political rights and empowering human rights defenders.

Civil Rights Defenders' approach takes a long-term perspective and is based on an active field presence, regional expertise, and close collaboration with local partners.

Civil Rights Defenders strives to strengthen civil society and empowers human rights defenders, including those most at risk.

Civil Rights Defenders takes legal action against states and power holders, while also conducting lobbying and advocacy work to effect change, influence public opinion and ensure that people have access to independent information required for discussion and debate.

Civil Rights Defenders' work is based on three values: integrity, skills and efficiency.

#### *Integrity:*

Civil Rights Defenders is an independent non-governmental organisation that pursues pressing issues. Its employees are highly committed to their work and do not shy away from difficult subjects or geographical regions where governments and authorities do not comply with basic human rights standards. Grants are not accepted from donors who wish to direct the operations or who do not support our objectives.

#### *Skills:*

Civil Rights Defenders has considerable expertise in our fields. Our analysis is based on solid research and international human rights standards. Civil Rights Defenders always strives towards high quality work and seeks to support the development of skills and expertise of staff and local partners.

#### *Efficiency:*

Civil Rights Defenders is a result-oriented and slim organisation with tight financial controls and management. To ensure learning, accountability and transparency in the planning, monitoring and evaluation, we use a results based management system.

We are able to quickly adjust to changing and volatile situations and have a high degree of flexibility when required.

## **2. Purpose**

The Code of Conduct, together with other Civil Rights Defenders policy documents, sets out professional standards that Civil Rights Defenders abides by. Board members, staff, interns, volunteers and long-term consultants who represent the organisation (hereinafter referred to as: employees or similar) are required to adhere to the Code of Conduct when representing Civil Rights Defenders, including travelling or on assignment on behalf of Civil Rights Defenders.

Employees or similar should at all times adhere to national and international human rights standards.

The Executive Director and heads of departments are responsible for the implementation and administration of the Code of Conduct. Each head of department is responsible to ensure that all staff under his or her supervision are thoroughly familiar with the Code of Conduct and are complying with it.

Non-compliance with the Code of Conduct will not be accepted and may, in accordance with applicable legislation, lead to internal disciplinary actions, dismissal and/or, reporting to the police or other relevant authorities.

## **3. Reporting of Violations**

Suspected cases of violations to the Code of Conduct should always be reported to the direct superior or to the Working Group against Corruption (WGC) who will take appropriate action. Due to the sensitivity of such cases it is essential that all parties treat the information with care.

The internal whistleblower function can be used in order to get full anonymity. The following documents are relevant to the reporting of violations:

- Anti-Corruption Policy
- Whistleblower Policy

Intentional false accusations will lead to disciplinary actions against the employee or similar who made the accusations.

## **4. Abuse of Power**

Abuse of power is taking advantage of a professional position to gain benefit for oneself or another persons. For examples of improper benefits see below, Section 8. Employees or similar may at no time abuse their position at Civil Rights Defenders. This applies also when not officially representing Civil Rights Defenders. Hence it is essential that behaviour never be reasonably understood as if favours or benefits of any kind are expected.

If an employee or similar engages in a close personal relationship that could amount to or reasonably seem to be a conflict of interest with his or her work obligations, the direct superior should be informed. This could include a relationship with a colleague, an employee in a partner organisation of Civil Rights Defenders or a person with a professional relation to Civil Rights Defenders. The supervisor will together with the Executive Director take appropriate action as needed to ensure that decision-making and work is not affected.

## **5. Sexual exploitation and abuse**

All forms of sexual exploitation and abuse are prohibited, as are all forms of sexual contact with a child. Child is defined in accordance with the definition in the UN Convention on the Rights of the Child, any child under the age of 18. Mistaken belief in the age of a child is not a valid justification for the misconduct.

It is not acceptable to exchange money, employment, goods or services for any kind of sexual activity.

## **6. Harassment**

At Civil Rights Defenders all employees or similar shall be treated with dignity and respect and shall treat partners and other professional contacts with the same level of respect. Harassment refers to any unwanted conduct that occurs with the purpose or effect of violating the dignity of a person, and of creating an intimidating, hostile, degrading, humiliating or offensive environment.

It is prohibited to commit any act or form of harassment and engage in any behaviour, deliberate or otherwise, that makes the recipient feel persecuted, vulnerable or powerless. Harassment that is related to gender, gender identity or expression, ethnicity, nationality, religion or other belief, sexual orientation, disability or age is a form of discrimination.

## **7. Discrimination**

Civil Rights Defenders condemns all forms of discrimination by any employee or similar.

Direct discrimination is when a person treats, or proposes to treat, someone unfavourably because of a personal characteristic, such as gender, gender identity or expression, ethnicity, nationality, religion or other belief, sexual orientation, disability or age.

Indirect discrimination occurs when seemingly neutral practices, policies or conditions disadvantage persons with a personal characteristic.

## **8. Unethical Business Practices**

Civil Rights Defenders applies zero tolerance to financial irregularities and corrupt practices.

Civil Rights Defenders' work must be subject to a high level of business ethics. Extreme caution shall always be applied when offered different types of benefits associated with contact networking or public relations activities. If the benefit or favour is deemed improper, the recipient is guilty of bribery and the donor of corruption. In addition to dismissal, the issue of compensation also arises. Anyone who has influence in a case may find himself or herself exposed to attempted bribery. Bribery may be committed before, during and after employment.

Examples of appropriate favours:

- working meals of an everyday character
- congratulations on round-number birthdays and other days worthy of special note, provided these are moderate in relation to the individual circumstances
- ornaments without substantial market value and other reasonable souvenirs to mark the organisation's anniversaries or similar.

Receiving or offering the above favours does not normally constitute bribery or corruption. It is safe to work on the basis that simple gifts under the value of EUR 20 are permitted. However, caution should be applied to meals, which do not have an immediate connection to work, such as Christmas lunches. If husbands/wives/partners are also invited, there is an increased risk that the favour is improper.

Examples of improper favours:

- gifts in the form of cash, bonds, securities etc.
- cash loans
- guarantees or funding
- remission of a purchase consideration, claim, instalment payment or interest
- private commission and bonus arrangements
- secondary deliveries of goods or services from the organisation's suppliers (e.g. building materials, transport/craft services)
- engagement of the organisation's suppliers in a private capacity at non-market rates
- access to vehicles, boats or leisure accommodation for private use
- wholly or partially paid pleasure trips or holidays.

Any employee or similar offered services, gifts or other favours, which might be considered improper, must contact his/her supervisor or the Legal Director for a decision. The principal rule is not to accept offers of this nature. Any exceptions must be justified, documented and approved by the Executive Director.

Project cooperation which involves financial support from Civil Rights Defenders must not be undertaken with organisations in which an employee or similar or an employee's relative is a member of the management group (e.g. as a director) or holds some other position which could, or could be seen to, affect independence or lead to a conflict of interest.

It is also not permitted to engage on Civil Rights Defenders' behalf any company belonging to employees or similar or closely related parties. Any requests for exemption from this rule must be submitted in writing to the Executive Director for approval.

### **9. Additional Assignments**

Civil Rights Defenders' employees or similar are encouraged to participate in activities arranged by other organisations which are in some way related to our work (for example holding seminars and writing articles). Such participation should generally be perceived as part of our work.

If remuneration is paid and the assignment is made on duty or in connection to duty, the remuneration should go to Civil Rights Defenders. It should also, where appropriate, clearly be stated that the employee or similar is representing Civil Rights Defenders.

Assignments or activities which are not related to work or which are not made on duty or in connection to duty, so called personal assignments, need to be approved by the supervisor, when there can reasonably seem to be a conflict of interest due to competitiveness, risk of damaging confidence and/or the hindering of work.

## **10. Criminal activity**

It is prohibited for Civil Rights Defenders' employees or similar to be involved in any type of criminal activity. Organised crime is an illegal behaviour that is planned and carried out by groups of people in a systematic fashion, such as trafficking in people and trade in cheap capital goods in the black market. Trafficking in human beings can include, for instance, sexual exploitation, forced labour or services, slavery, servitude or the removal of organs.

Employees or similar shall not engage in activities that are criminalised under national law, except for situations when national law contradicts international human rights standards or other norms in a democratic society, and such activities are strictly related to work and carried out in agreement with the supervisor.

## **11. Alcohol**

Civil Rights Defenders has a restrictive approach to alcohol and the consumption of alcohol. During work hours, consumption of alcohol by employees or similar is only permitted in exceptional cases like official dinners and similar events or in other situations where the use of alcohol is expected. Alcohol consumption must in such circumstances be modest so as not to affect the work or jeopardise the reputation of Civil Rights Defenders. Consumption in connection with driving is strictly prohibited.

## **12. Pornography**

No pornographic material is allowed in the workplace. This includes all types of technical equipment. It is not allowed to use any equipment or material that belongs to Civil Rights Defenders to access pornographic material or disseminate it.

All dealings with child pornography are prohibited.

## **13. Narcotic Substances**

Unless authorized by medical staff all forms of involvement or contact with preparations classified as narcotics are prohibited.

## **14. Security**

Security for employees or similar is a top priority for Civil Rights Defenders. Civil Rights Defenders will do all that it reasonably can to meet the highest security standards. Security is an individual as well as an organisational responsibility.

It is strictly prohibited for any employee or similar to use or carry weapons or ammunition as well as to drive a vehicle under the influence of alcohol or any illegal substance.

Civil Rights Defenders Security Policy provides guidance on how to ensure security and must be followed by all staff, volunteers and the Board.

## **15. Understanding the Code of Conduct**

By signing this document the signatory understands Civil Rights Defenders Code of Conduct, assures that s/he will follow these rules and accepts that any violation of any of the above provisions may have consequences.

Employees or similar are only bound by provisions in the signed version of the Code of Conduct.

Any amendments or changes to the Code of Conduct decided by the Board, becomes effective in relation to an employee or similar upon signature.

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Name, Title

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Date, City