



CODE OF CONDUCT

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1. INTRODUCTION

This Code of Conduct establishes the ethical principles, standards, and expectations that guide the behaviour of all LISUDEV staff and contract partners. As an organization committed to improving the quality of life for underprivileged populations, particularly women and children, LISUDEV upholds the highest standards of integrity, respect, and excellence. This Code of Conduct ensures that all staff and contract partners contribute to preventing unethical and criminal activities and promote a culture of ethical behaviour and accountability.

1.1 DEFINITIONS

Fraud: Intentional deception for personal or organizational gain.

Corruption: Abuse of entrusted power for private benefit.

Bribery: Offering, giving, receiving, or soliciting something of value to influence decisions.

Conflict of Interest: A situation where personal interests interfere, or appear to interfere, with official duties.

Sexual Exploitation: Abuse of a position of vulnerability, power, or trust for sexual purposes.

Sexual Abuse: Actual or threatened sexual intrusion by force or under unequal conditions.

Sexual Harassment: Unwelcome sexual conduct that creates an intimidating, hostile, or offensive environment.

Whistleblower: A person who reports known or suspected misconduct.

Money Laundering: Concealing the origin of proceeds obtained through unlawful activities.

Terrorist Financing: Providing or collecting funds or resources to support terrorist activities or organizations.

1.2 SCOPE

This Code of Conduct applies to all LISUDEV staff, including permanent and temporary employees, volunteers, interns, and consultants, as well as contract partners, including suppliers, contractors, and any other entities working with or on behalf of LISUDEV.

1.2. CORE VALUES

- ❖ Integrity: We conduct all activities honestly, transparently, fairly, and ethically.
- ❖ Accountability: We are accountable to our communities, partners, donors, and ourselves.
- ❖ Sustainability: What we do is meant to last long.

- ❖ Non-discrimination: We treat all individuals with dignity, respect, fairness, and compassion.
- ❖ Participation and inclusiveness: We foster meaningful participation, diversity, equity, and inclusion in all our work.
- ❖ Client-centred services: We prioritize the needs, rights, safety, and wellbeing of the people and communities we serve.

1.3 RESPONSIBILITIES

1.3.1 Responsibilities of LISUDEV Staff

All LISUDEV staff must:

- Understand and adhere to the Code of Conduct and all related policies and procedures (*Anti-Bribery and Anti-Corruption Policy, Safeguarding Policy, Child Protection Policy, Financial Management and Accounting Policy, Procurement Policy, Confidentiality Policy, Privacy and Data Protection Policy etc*).
- Serve as role models of ethical behaviour and integrity.
- Promptly report any violations of the Code of Conduct to supervisors or designated authorities.
- Participate in training and awareness programs related to ethical conduct and compliance.

1.3.2. Responsibilities of Suppliers, Contractors and Partners

All LISUDEV's suppliers, contractors, consultants, and partners must:

- Comply with this Code of Conduct, Anti-Terrorism and Anti-Money Laundering, and all contractual and applicable regulations.
- Maintain equivalent ethical standards.
- Cooperate with compliance reviews and investigations.
- Report suspected violations.
- Ensure their personnel comply with these requirements.

Failure to comply may result in suspension, termination of contracts, or other sanctions.

2.0. STANDARDS OF CONDUCT

“THE DOs and DON'Ts”

THE DON'Ts

- ❖ We prohibit all forms of fraud and corruption with a zero-tolerance policy.
- ❖ Do not make or receive any payments or gifts, or provide or receive other favours, to or from any public official, political figure, representative of a regulatory body or government agency, nor to or from any of our suppliers, programme partners or any other party (whether public or private) in

order to influence or reward any act or decision to grant a license or regulatory approval, obtain or retain business, or to seek any other unlawful or improper purpose of advantage.

- ❖ This prohibition excludes gifts and hospitality of minor value which are in keeping with general business practices and which are not subject to reasonable interpretation as an improper inducement. Offices may wish to maintain a register of gifts and hospitality.

THE DOs - In critical situations, act as follows:

- ❖ Ignore or reject any hints at committing an act of fraud or corruption;
- ❖ Try to have someone as your witness to support you;
- ❖ Agree to nothing improper, even if the suggestion includes a “charitable donation”; and
- ❖ Maintain fair and accurate records, documenting the details of any requested, attempted or actual act of fraud or corruption, as soon as possible after the event.

All personnel must:

- ❖ Adhere to all applicable local, national, and international laws and regulations, as well as LISUDEV policies and procedures.
- ❖ Avoid actual, potential, or perceived conflicts of interest. Declare any conflicts of interest immediately to their line manager or higher authority.
- ❖ Protect confidential information obtained through work and do not disclose it to anyone except for work purposes. All computers are password-protected.
- ❖ Ensure that all organizational records, including financial and operational records, are accurate, complete, and truthful as stated in the *Anti-Bribery and Anti-Corruption Policy*.
- ❖ Utilize LISUDEV resources responsibly and for their intended purposes, avoiding waste and abuse.
- ❖ Do not engage in, facilitate, or condone bribery, corruption, or any form of unethical conduct.

2.1 DIVERSITY, EQUITY, INCLUSION AND ACCESSIBILITY

LISUDEV is committed to equal opportunity and non-discrimination. Discrimination, exclusion, harassment, or unfair treatment based on race, ethnicity, colour, nationality, religion, political opinion, gender, sexual orientation, disability, age, marital status, social status, or any other protected characteristic is prohibited.

LISUDEV promotes:

- ❖ Equal opportunity in recruitment, promotion, and professional development.
- ❖ Inclusion of marginalized and vulnerable populations.
- ❖ Respect for cultural diversity.
- ❖ Reasonable accommodation for persons with disabilities whenever feasible.

2.2 SAFEGUARDING AND PROTECTION FROM SEXUAL EXPLOITATION AND ABUSE (PSEA).

LISUDEV has zero tolerance for Sexual Harassment, Exploitation, and Abuse (SEA).

All personnel must:

- ❖ Respect the dignity, rights, and safety of beneficiaries and community members.
- ❖ Never engage in any form of sexual exploitation, abuse, harassment, or coercion.
- ❖ Never exchange money, employment, goods, services, assistance, or any benefit for sexual favours.
- ❖ Never engage in sexual activity with a child (a person under 18 years of age), regardless of local laws or customs.
- ❖ Report all safeguarding concerns immediately to your line manager, supervisor, administrator or use the safe email: reportcase@lisudevcm.org
- ❖ Failure to report known or suspected safeguarding issues may constitute misconduct and may attract disciplinary actions, including termination of contract.

2.3 CHILD PROTECTION

All personnel must:

- ❖ Create and maintain safe environments for children.
- ❖ Prevent abuse, exploitation, neglect, violence, and harm.
- ❖ Interact with children respectfully and appropriately. No personnel should be found in lone place with a child.
- ❖ Immediately report concerns or allegations of child abuse.
- ❖ Comply with all Child Protection policies and procedures.

2.4 PREVENTION OF WORKPLACE HARASSMENT AND BULLYING

LISUDEV prohibits:

Sexual harassment, verbal abuse, psychological harassment, intimidation, workplace bullying, cyber harassment and retaliation against complainants.

All staff have the right to a safe, respectful, and professional work environment.

2.5 ANTI-FRAUD, ANTI-CORRUPTION AND ANTI-BRIBERY

LISUDEV has zero tolerance for fraud, corruption, bribery, embezzlement, kickbacks, facilitation payments, and other forms of unethical conduct.

Personnel must not:

- ❖ Offer, give, solicit, or accept bribes.

- ❖ Manipulate procurement or recruitment processes.
- ❖ Misuse organizational funds or resources.
- ❖ Falsify records or reports.
- ❖ Engage in fraudulent activities.

Only modest gifts and hospitality that comply with applicable laws, donor regulations, and organizational policies may be accepted. All gifts and hospitality received or offered must be declared and recorded where required.

2.6. ANTI-TERRORISM AND ANTI-MONEY LAUNDERING

LISUDEV prohibits the provision of funds, assets, services, material support, training, advice, resources, or any other assistance to prohibited parties, terrorist organizations, sanctioned entities, or individuals involved in terrorism, terrorist financing, money laundering, or other criminal activities.

- ❖ Staff and partners must comply with applicable local laws, donor requirements, sanctions regimes, and anti-money laundering laws.
- ❖ Staff must not knowingly engage with, fund, support, or facilitate activities involving prohibited individuals or entities.
- ❖ In exceptional circumstances where a payment is made under extreme duress to protect against an imminent threat to the life, health, safety, or liberty of staff or others, the incident must be reported immediately when it is safe to do so. Personnel acting under such extreme duress shall not be subject to disciplinary action.

2.7 DATA PROTECTION, PRIVACY AND CONFIDENTIALITY

Personnel must:

- ❖ Protect personal and sensitive information.
- ❖ Obtain appropriate consent before collecting, using, sharing, or publishing personal information.
- ❖ Store information securely.
- ❖ Restrict access to authorized individuals only.
- ❖ Comply with applicable data protection laws and donor requirements.
- ❖ Obtain consent of program participants before taking any photographs, videos etc.
- ❖ Photographs, videos, and personal information of beneficiaries shall not be used without appropriate authorization and consent.

2.8 SOCIAL MEDIA AND COMMUNICATIONS

Personnel must:

- ❖ Protect confidential and sensitive information.
- ❖ Communicate respectfully and professionally.
- ❖ Avoid statements that could damage the reputation of LISUDEV.
- ❖ Clearly distinguish personal opinions from official organizational positions.

2.9 REPORTING, WHISTLEBLOWING:

“IF YOU SEE SOMETHING, SAY SOMETHING”

All personnel have a duty to report suspected misconduct.

- Reports may relate to fraud, corruption, bribery, safeguarding concerns, child abuse, harassment, terrorism financing, money laundering, and policy violations. Reports may be made through your line manager, supervisors, senior management, the Board, or designated reporting channels or reportcase@lisudevcm.org.
- LISUDEV strictly prohibits retaliation against any person who reports concerns or participates in an investigation. All investigations will be carried out under strict confidentiality.
- No individual shall suffer intimidation, harassment, discrimination, victimization, dismissal, or other adverse consequences for making a good-faith report.

3. INVESTIGATIONS

All allegations shall be assessed promptly, fairly, confidentially, and objectively.

- Investigations must respect due process, protect confidentiality, avoid conflicts of interest, and be documented appropriately.
- Allegations involving senior management, board members, or individuals with oversight responsibilities may be referred to independent external investigators.
- LISUDEV will cooperate fully with regulators, auditors, donors, and law enforcement agencies where appropriate.

4. POST-INCIDENT

Following a suspected or confirmed incident of fraudulent or irregular practice, the organization’s financial risks and control measures are reviewed and amended where necessary.

5. IMPLEMENTATION AND ENFORCEMENT

The Director and all LISUDEV managers, Board are responsible for ensuring:

- ❖ That the Code of Conduct is communicated to all staff and contract partners and is readily accessible.
- ❖ Provide regular training and awareness programs on the Code of Conduct and related policies.
- ❖ Monitor compliance with the Code of Conduct and evaluate its effectiveness regularly.
- ❖ Apply appropriate sanctions and disciplinary actions for violations of the Code of Conduct, up to and including termination of employment or contracts.

POLICY REVIEW

This policy shall be reviewed every two years or as needed to reflect changes in the organization or its operating environment.

RELATED POLICIES AND PROCEDURES: Anti-Terrorism and Anti-Money Laundering Policy, Anti-Bribery and Anti-Corruption Policy, Safeguarding Policy, Child Protection Policy, Financial Management and Accounting Policy, Procurement Policy, Confidentiality Policy, Privacy and Data Protection Policy, Conflict of Interest Policy.