

# CODE OF CONDUCT, ETHICAL RULES & CONFLICTS OF INTEREST

Revised version approved by the Board of Directors on June 22, 2020



The mission of CECI is to combat poverty and exclusion through sustainable development projects in Africa, Asia and the Americas since 1958.

## PREFACE

The purpose of this Code of Conduct is to set out our principles of behaviour, and to preserve the long-standing tradition of integrity and credibility that CECI has upheld since its foundation in pursuit of its mission to combat poverty and exclusion.

This document defines the principles to which we subscribe, **in accordance with our values that are rooted in cooperation, integrity, respect, equity and commitment**, as well the ethical rules that our employees at our head office and in the countries where we operate as well as upper management, board members, country advisory committee members and consultants promise to follow.

## PRINCIPLES

Individually and collectively, we promise to:

- Obey the law, adhere to the organization's internal policies and follow through on our commitments
- Respect and protect the communities with which we work
- Create a work environment based on mutual trust and respect and that encourages open communication
- Perform our duties with honesty, integrity and diligence
- Avoid any conflict of interest, real or perceived
- Demonstrate loyalty to the organization.

## SCOPE

Rooted in common sense and good faith, the principles and rules set out in this document are intended to help guide the actions of everyone at CECI with respect to their position.

They apply to all CECI's staff, regardless of level or status. It is part and parcel to CECI's work contracts.

## APPLICATION

This Code applies to all members of the organization in the performance of their duties and to all persons fulfilling a mandate with CECI and is intended to guide their use of the human, financial and technical resources at their disposal.

# CODE OF CONDUCT, ETHICAL RULES & CONFLICTS OF INTEREST

## OUR ETHICS

### Section I - ACT WITH INTEGRITY

*We will refrain from making any agreement or committing any act that is inconsistent with the law or with the ethical guidelines regarding sound administration and good conduct. We will also refrain from making transactions or agreements of an illicit or unethical nature with third parties.*

#### CODE OF CONDUCT :

- Demonstrate transparency in relations and transactions with the organization's partners, funders and collaborators while protecting confidential information.
- Show extreme discretion with all confidential information, especially personal information, and take the necessary measures to ensure they are kept in a secure place.
- Protect confidential information, developed approaches, program strategies and all other types of content that belong to the organization.
- Maintain a trusting relationship with the organization's partners and do not reveal information without their express consent, except when required by law.
- Do not make any unauthorized payments, negotiations or expenses.
- Do not take advantage of confidential or privileged information to obtain or negotiate personal gain.
- Respect CECI's goods and resources and do not use them for personal gain.
- Do not make any copies of software provided by the organization and from using personal software on CECI's equipment.

### Section II – DEMONSTRATE DILIGENCE

*We carry out our duties conscientiously, provide accurate information and properly maintain all files and records.*

#### CODE OF CONDUCT :

- To fulfil its mission and produce strong results, CECI counts on each and every person to perform their duties with rigour and diligence.
- Performing your duties with diligence means keeping files in order and adding accurate information to them, without showing favour to anyone.

# CODE OF CONDUCT, ETHICAL RULES & CONFLICTS OF INTEREST

## Section III - OBEY THE LAW

*We obey the law and regulations in effect in our respective countries and follow the organization's internal policies and guidelines.*

*The organization has adopted an Anti-Corruption and Fraud Prevention Policy and takes a zero-tolerance stance in this regard.*

### CODE OF CONDUCT :

- In the course of their duties or mandate, the organization's members will not break any law, civil or criminal, and will act in accordance with contracts that CECI has signed.
- Illegal acts such as fraud, theft of goods or time, acceptance of bribes or kickbacks, or any other type of corruption are unacceptable and will not be tolerated at any time. The misuse of food or materials intended for beneficiaries constitutes theft.
- When using the Internet and social media, whether for personal use or on behalf of CECI (with its authorization), the members of the organization must not break any law, make any abusive, inflammatory, racist or sexist comments, or share any hateful, pornographic or harassing material, or any material for which CECI does not hold the copyright.

## Section IV - RESPECT OTHERS

*We treat each other with courtesy, diligence, good faith and fairness, and with respect for the rights and freedoms to which every person is entitled. This means that discrimination and harassment will not be tolerated at any time within the organization, nor will any harm to the health, safety and dignity of one's colleagues. Respect must be shown toward others at all times.*

### CODE OF CONDUCT :

#### ***Respecting others means:***

- Treating every person equally while taking into account their differences
- Respecting basic human rights without distinction, exclusion or preference based on race, colour, sex, gender identity or expression, pregnancy, sexual orientation, marital status, age (except as stipulated by law), religion, political convictions, language, ethnic or national origins, social condition, disability or the use of a means to palliate a disability
- Respecting the culture and customs of local communities in the countries where we operate
- Maintaining a work environment that fosters cooperation and mutual respect, and that is free of harassment, physical or verbal violence, intimidation and discrimination

# CODE OF CONDUCT, ETHICAL RULES & CONFLICTS OF INTEREST

- Protecting the health, safety and dignity of all the organization's members
- Reporting any situation witnessed where respect is not shown.

## **Section V - PROTECT PEOPLE AGAINST EXPLOITATION AND ABUSE**

*Afin To fulfil its mission, the organization is called to work with communities in situations where the population is vulnerable to exploitation and abuse. This is particularly true for women and children.*

*The organization has adopted a Policy on the Prevention of Harassment, Exploitation and Sexual Abuse and has a zero-tolerance policy in this regard.*

### **CODE OF CONDUCT :**

- Establish and maintain an environment that prevents abusive behaviour, such as sexual abuse, abuse of power and corruption.
- Never commit any form of harassment, exploitation or abuse.
- Never exploit a person's vulnerability, particularly if that person is a woman or a child, and never allow them to be put in any sort of compromising position.
- Never engage in any form of sexual exploitation or sexual abuse.
- Never ask for sexual favours or for a person to perform any other form of humiliating, degrading or servile behaviour in exchange for money, a job, goods or services, or in exchange for assistance that is due to any person.
- Never engage in any activities of a sexual nature with beneficiaries. Such relations are prohibited because they are abusive due to the inherent power imbalance. They undermine the credibility and integrity of international cooperation work.
- Never engage in activities of a sexual nature with persons under age 18, regardless of local laws on the legal age of consent or the country's age of majority. Not knowing the real age of a child can never be used as a defence.
- Make sure that every report of a violation of these rules made against a colleague by beneficiaries or other colleagues is treated with the strictest confidentiality.
- Make sure that every report of a violation of these rules is submitted to the persons in authority. The persons who receive these reports will launch an investigation in keeping with the established protocol.

# CODE OF CONDUCT, ETHICAL RULES & CONFLICTS OF INTEREST

## Section VI - PROTECT CHILDREN

*We have a duty of diligence toward children who are in contact with our organization through the programs we operate in the communities where we work.*

### **CODE OF CONDUCT :**

- Stay aware of situations that could put children at risk. Plan and organize work and the work environment in such a way that minimizes these risks.
- Stay within eyesight, to the extent that it is possible, when in contact with children.
- Refrain from developing relationships with children that could in any way be perceived as exploitative or abusive.
- Never interact with a child in a way that could be deemed abusive or that could put them at risk of being abused.
- Never use language, make suggestions or offer advice that is inappropriate, offensive or abusive.
- Never behave in a way that is physically inappropriate or sexually provocative toward a child.
- Never display or tolerate behaviour with one or more children that is illegal or exposes them to danger.
- Never behave in such a way with a child that could cause them to feel ashamed, humiliated or demeaned.
- Never initiate activities of a sexual nature with children (any person under age 18).
- Never push, hit or spank a child.
- Never bring children to your home, especially not if you are alone with them.

## Section VII – AVOID ANY CONFLICTS OF INTEREST

*We avoid entering into any conflict of interest, whether real or perceived. We will take every necessary measure to resolve any such conflict and disclose any potential conflict before it occurs.*

*Each member of the organization must complete the declaration of absence of conflict of interest and commit to immediately disclose any subsequent situation likely to lead to a conflict of interest.*

### **CODE OF CONDUCT :**

- All members of the organization must disclose any conflict of interest that might bring personal gain to themselves or their loved ones to the detriment of the interests of the organization or those who benefit from its services. They must disclose any conflict of interest that has been brought to their attention.



# CODE OF CONDUCT, ETHICAL RULES & CONFLICTS OF INTEREST

- They must also disclose any situation that might lead to a perceived conflict of interest, since the appearance of a conflict of interest can be as damaging as a real conflict.
- All members of the organization must immediately inform CECI when they, their spouse, or a close relative negotiates a service contract with CECI or has interest in a business that negotiates goods or services with the organization.
- Members of the organization who have or whose spouse or close family member who has interest in a company that deals with CECI must not, under any circumstances, participate in the decision-making or contract awarding process.
- Members of the organization must disclose if they are a member of the board of directors of another NGO.
- The managers must ensure that every transaction for which they are responsible meets the organization's transparency requirements.
- Every good, favour, service, benefit or gift must be considered a potential conflict of interest. To be accepted (or offered), a gift must be modest and customary such that it is perceived as a token of appreciation, hospitality or courtesy, and cannot in any way be construed as inappropriate influence.

## Section VIII - DEMONSTRATE LOYALTY

*CECI recognizes that members of the organization may actively participate as staff in activities in their community and on social media. Members must not take any position that could cause trouble for the organization or give the impression that CECI endorses their opinions or authorizes the information being transmitted.*

### CODE OF CONDUCT :

- Members of the organization who use the Internet and social media must not comment, publish or share personal or confidential information regarding CECI without its authorization.
- All members promise to respect the organization's policies on using computer systems, email and the Internet.
- No member of the organization can or should express any political opinions in CECI's name, unless a specific request has been made by management or the Board of Directors.
- No member of the organization is allowed to use the organization's goods, services, equipment or facilities for political activities or for personal gain, except when given the organization's express consent.

### Demonstrating loyalty means:

- Meeting one's employment conditions, if employed by CECI
- Performing one's duties in good faith and in the best interest of the organization
- Showing dedication to one's job
- Contributing to CECI's corporate image
- Not engaging in activities that could discredit CECI and/or jeopardize trust toward the organization
- Respecting and protecting CECI's intellectual property.

# CODE OF CONDUCT, ETHICAL RULES & CONFLICTS OF INTEREST

## **Section IX - DEMONSTRATE TRANSPARENCY**

*We only take actions that we can discuss openly and publicly if required to do so.*

This principle is the result of everything that precedes it. If all of the rules listed above have been followed, CECI and its members will have nothing to regret if asked to justify or explain their actions or decisions publicly. This requires a high degree of rigour in the decision-making process and strong integrity throughout the implementation and execution stages, in compliance with charters, laws, regulations, standards, directives, policies or collective agreements.

## **Section X - ADMINISTRATIVE RULES**

### **RESPONSIBILITY FOR MANAGING THE CODE**

The Human Resources department is responsible for interpreting the Code and for receiving reports. However, if there is a report against a Human Resources staff member, it will be forwarded to upper management.

Those who are in charge of interpreting the Code can refer to any relevant external legal reference to fulfil this responsibility.

### **RESPONSIBLE FOR APPLYING THE CODE**

All managers are responsible for applying the Code of Conduct within their department or their scope of management and must ensure that every person they supervise has read, understood and signed the Code.

All members of the organization must adhere to the Code of Conduct and Ethical Rules and report any conflict of interest or breach, real or perceived, to upper management or to the Chair of the Board of Directors, depending on the situation.

### **SANCTIONS**

Depending on the seriousness, a breach or violation of the rules and principles set out in this Code is punishable by disciplinary action up to and including dismissal, contract termination or discharge, depending on the case, in addition to a potential lawsuit.

### **CONFIDENTIALITY**

All reports will be treated with diligence and complete discretion. The identity of informants will be kept confidential, except where the law or the court requires disclosure.

# CODE OF CONDUCT, ETHICAL RULES & CONFLICTS OF INTEREST

No measures will be taken against those who use the complaint reporting mechanism in good faith, even if the investigation concludes that the complaint was unfounded.

## **PROCEDURE :**

1. A breach of this code must be reported in writing to the Human Resources department, or to the Chair of the Board of Directors, if it involves a member of the Advisory Committee or the Board of Directors.
2. A report contains the following information:
  - The identity of the offending party or parties
  - A description of the breach
  - The date or period when the breach occurred
  - A copy of every document that supports the report
3. Any situation that occurs in a country where we operate and could be interpreted as harassment, exploitation, abuse or corruption/unlawfulness must be reported to CECI Canada.
4. If a report is deemed admissible, the person in question will be informed of the contents of the allegations and asked to give their version of the events.
5. Within thirty (30) business days of receiving the report or within ten (10) business days of learning all the relevant facts, managers will submit a report of observations to the Human Resources department. The person against whom the report was made will be advised of the measures taken against them.
6. However, if a report involves a member of the Human Resources department, the complaint must be sent directly to upper management. If the report involves a member of upper management, the complaint must be sent to the Board of Directors. The Board can ask the Human Resources department to gather information, consult any documents that are relevant to the investigation and meet with anyone implicated or involved.
7. If a situation requires CECI to take quick action, or if the suspected case is of a serious nature, the person against whom the report was filed may be relieved of their duties during the investigation.
8. The filing of a complaint under this Code will in no way preclude the exercise of other recourse provided for under the law or the collective agreement.



# CODE OF CONDUCT, ETHICAL RULES & CONFLICTS OF INTEREST

## Section XI - APPLICATION OF THE CODE TO HUMANITARIAN ASSISTANCE PROJECTS

This code meets the standards issued by the Inter Agency Standing Committee (IASC), which was founded in June 1992 further to resolution 46/182 of the United Nations General Assembly on strengthening humanitarian assistance. Resolution 48/57 of the General Assembly confirms the committee's role as a primary mechanism for inter-agency coordination of humanitarian assistance.

- All humanitarian workers hired by CECI are required to sign the statement pledging compliance with the Code of Conduct. Before the project is launched, these workers receive training, individually or in a team, on issues relating to exploitation, sexual abuse and corruption/unlawfulness. The topic is addressed again in a meeting midway through the project. The beneficiaries are made aware of the Code of Conduct when the project is launched and again midway through its implementation.
- Two key persons (one from the community and the other among project staff) are assigned to monitor and report potential cases. The beneficiaries can also, at any time, report cases of exploitation, sexual abuse or corruption/unlawfulness directly to CECI staff, project leads, country directors or regional directors/ coordinators, or via one of the mechanisms made available pursuant to the Policy on the Prevention of Harassment, Exploitation and Sexual Abuse and the Anti-fraud and Anti-corruption Policy.
  - ✓ Written reports can be submitted directly to the Director of Human Resources, at [directionRH@ceci.ca](mailto:directionRH@ceci.ca), including the details of the allegations, the name of any alleged victims, the name of the alleged perpetrator, a description of the incident(s) and the date(s) on which it or they occurred, and the names of any witnesses.
  - ✓ A report can be made to a manager or a country representative who is responsible for applying this policy. They will gather the information listed above and send it to the Director of Human Resources, at [directionRH@ceci.ca](mailto:directionRH@ceci.ca).
  - ✓ Anonymous reports can be emailed to [plainte@koesia.ca](mailto:plainte@koesia.ca). A professional resource external to the organization has been placed in charge of this email address.
- CECI's Country Directors are responsible for ensuring compliance with the provisions of this Code in their respective countries of operation. They are expected to take a firm stance against any form of corruption/unlawfulness, exploitation and abuse, and to remind employees at all levels of their obligation to comply with the Code of Conduct. Furthermore, they must inform CECI's Human Resources department in Canada of any report made involving exploitation, sexual abuse or corruption/unlawfulness.

CECI staff and country directors must encourage and support beneficiaries who have been exploited or sexually abused by CECI's humanitarian staff in filing a complaint with the local authorities so that investigations and potential lawsuits can be launched.

# CODE OF CONDUCT, ETHICAL RULES & CONFLICTS OF INTEREST

Any obstruction of justice or inability to comply with the investigations of local authorities will result in termination of employment.

- Any person accused of exploitation or sexual abuse, corruption or illegal acts will be immediately removed from the humanitarian assistance project.
- Illegal acts, corruption and exploitation/abuse of beneficiaries will be considered as serious misconduct that is subject to sanctions, which could result in termination without notice of the services rendered by the humanitarian worker in question.
- For staff hired by CECI in Montreal, the Human Resources department is responsible for resolving situations in keeping with the laws of Canada once an investigation has been conducted in the country.
- The Country Director is the person designated to receive reports. However, if the report is against the Country Director, it must be submitted to the regional director/coordinator. If the report is against the regional director/coordinator, it must be submitted to the Human Resources department.

If a report is deemed admissible, the person in question will be informed of the contents of the allegations and asked to give their version of the events.

Within thirty (30) business days of receiving the report or within ten (10) business days of learning all the relevant facts, managers will submit a report of observations to the respective regional director/coordinator. The person against whom the report was made will be advised of the measures taken against them.

During the investigation, the Country Director is in charge of gathering all the necessary information.

If a situation requires CECI to take quick action, or if the suspected case is of a serious nature, the person against whom the report was filed may be relieved of their duties during the investigation.

# CODE OF CONDUCT, ETHICAL RULES & CONFLICTS OF INTEREST

## STATEMENT

I, \_\_\_\_\_, have read and understood the contents of this Code of Conduct and promise to follow it.

I am aware that I must conduct myself in alignment with the organization’s values and comply with the ~~behavioural~~ standards set out in this code.

I understand that a breach of this code or a violation of one or more of its provisions could lead to disciplinary action up to and including dismissal, contract termination or discharge.

Signed on \_\_\_\_\_, 20 \_\_\_\_.

\_\_\_\_\_

Name

Signature \_\_\_\_\_

Function \_\_\_\_\_

# APPENDIX 1:

## ABSENCE OF CONFLICTS OF INTEREST

Any person, staff member (including project staff and contract workers), member of management, member of the Board of Directors, member a country advisory committee, must avoid placing himself in a position where his interests could compete with those of CECI, and must disclose/declare any commitment, obligation, relationship or interest that could constitute a conflict of interest, or that could be perceived as such.

Conflict of interest is defined as follows: a situation in which a person finds him/herself when entrusted with a function general interest which competes with professional or personal interests. Such interests could influence, or appear to influence, the way in which he or she carries out the tasks entrusted to him or her in the course of his or her duties.

These interests may be commercial, financial or non-pecuniary, and relate to the organization and/or the individual, his or her family members, friends or professional associates - present, past or future.

### ACTUAL CONFLICT OF INTEREST, POTENTIAL CONFLICT OF INTEREST OR APPEARANCE OF CONFLICT OF INTEREST

You may be in a conflict interest situation if a personal or professional interest comes into conflict, or could come into conflict, or could be perceived as coming into conflict, with CECI's interests. This conflict of interest may relate to issues such as :

- to hold a management or other position ;
- an interest in a business or profession;
- have existing professional or personal links with CECI;
- professional links with other organizations;
- personal ties other groups or organizations, or family ties.



# APPENDIX 1: ABSENCE OF CONFLICTS OF INTEREST

## DECLARATION

1- Do you have any links with an organization, body or company that deals or is likely to deal with CECI?

- by directly or indirectly owning an interest in it (financial, shares, units);
- by being a member of its board of directors, one of its officers, one of its representatives or consultants;
- through employment or volunteer activities?

Yes \_\_\_\_ No \_\_\_\_

\* If yes, please specify:

---

---

2- Is there any situation in which, through your activities or those of your close relations, you could be in a situation of apparent, real or potential conflict of interest? Yes \_\_\_\_ No \_\_\_\_

\* If yes, please specify

---

---

3- Apart from what you have stated above, do you have any relationships or interests that may prevent you or could be perceived as preventing you from exercising your judgment or making decisions independently and objectively in the interest of CECI?

Yes \_\_\_\_ No \_\_\_\_

\* If yes, please specify

---

---

## COMMITMENT

I declare that I am not currently in a situation of conflict of interest and undertake to declare any situation of real, potential or apparent conflict of interest that may arise subsequently to this declaration and modify it.

I am aware that failure to comply with this declaration may result in sanctions, such as disciplinary measures up to and including dismissal, termination of contract or removal from office, as the case may be.

I, the undersigned, \_\_\_\_\_ certify that I have read this declaration, that I understand its provisions and that I undertake to comply with them. In witness whereof, I have signed at \_\_\_\_this\_\_\_\_day of \_\_\_\_\_20\_\_\_\_.

Signature: \_\_\_\_\_