



**HATOF Foundation**  
(An Environment NGO)

# CODE OF CONDUCT AND ETHICS POLICY

**APRIL 2016**

**HATOF Foundation**  
**BM101 SKY RD, GT-261-3212, LASHIBI-KLAGON**

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## **PART ONE**

### **1.0 INTRODUCTION**

HATOF Foundation is a Ghanaian Non-Governmental Organization that strives to ensure best practice in its everyday operations. Therefore, the highest standards of conduct, professional ethics and unwavering integrity are expected from its staff and members in their conduct of environmental and institutional business.

This Code of Conduct (*hereinafter referred to as the “Code”*) has been developed in order to provide guidance towards compliance with such standards, and to demonstrate best practice in action, consistent with HATOF’s Core values, Goal, Vision, and Mission.

As one of the vibrant national NGOs with global recognition and affiliations, HATOF staff, management and Directors are expected to perform their roles in the best interests of its partners, people, and community groups they engage and aim to serve.

#### **1.1. Purpose of This Policy**

This policy has been created to provide a framework and guidance on HATOF’s approach to achieving and maintaining good business behaviour by means of sound ethical conduct. It serves to ensure that all employees are aware of their individual and collective responsibilities with regards to the organization’s ethics, and to emphasize our employees’ and partner’s expectations to being treated fairly and in accordance with good business practices.

All employees are responsible for reading this document in its entirety and for ensuring that they comply with all the policy requirements as stated within this document.

HATOF is committed to protecting employees and partners from illegal or damaging actions by individuals, either knowingly, or unknowingly. When HATOF addresses issues proactively and uses correct judgement, it will help enhance organization’s reputation. HATOF will not tolerate any wrongdoing or impropriety at any time. The organization will take the appropriate measures and act quickly where the ‘ethical code’ is broken.

#### **1.2. Applicability**

This policy applies to all employees and Directors of HATOF Foundation. It also applies to volunteers, interns, and part time employees of HATOF Foundation, individuals subcontracted as consultants and individuals introduced by other partner organizations. Staff members together with all others working for HATOF are collectively referred to in this policy as “personnel” or “you” or “employee.” “We” or “the Organization” are used along with “HATOF” to mean the HATOF Foundation.

Any changes to this Code shall be subject to prior consultation with the management team and require the approval of the Board of Directors.

### **1.3. Policy Statement**

Any changes to this Code shall be subject to prior consultation with the management team and require the approval of the Board of Directors.

Consultants and Volunteers are strongly recommended to adhere to this Code. The management team and staff are bound by their own Code of Conduct.

A reputation for integrity is one of the most valuable assets a company can possess. HATOF's reputation has been built over many years and is dependent on the integrity and sense of responsibility demonstrated by our employees. The policy sets forth our commitment that all employees exemplify a high standard of ethical and legal conduct in all HATOF business practices. While compliance with applicable law is the foundation for the policy, you are expected to avoid unethical business dealings, whether actual or perceived, even when those business dealings may not violate applicable law. In many respects, the policy sets forth a higher standard than applicable legal requirements. The policy covers a wide range of topics, but it cannot be expected to cover every issue that may arise. As a result, the policy sets forth certain fundamental principles to guide you.

### **1.4. Our Approach to Work**

HATOF Foundation brings together a local community of professionals creating a better world for the current and future generations through local and global actions. We are highly motivated, technically inclined and we conduct our business with utmost professionalism, trust, integrity and to the highest ethical standard ensuring balance between collective social interests and environmental protection.

We share a common approach to the work and vision of the organization which inspires and directs the conduct of our everyday business along the following lines:

- We take intelligible and reliable actions based on the best understanding of national and global issues and laws.
- We guarantee equal rights for all staff, volunteers, and consultants across the organization according to national and global laws and HATOF principles.
- We welcome all multifaceted stakeholders willing to work with us under HATOF values, mission, and vision.
- We endeavor to be results oriented and confidential in our deliverables.

### **1.3 Our Principles and Expected Standards of Conduct**

The Code is founded and organized around the following principles and basic standards of conduct:

#### **1.3.1 Integrity, trustworthiness, and accountability**

All staff and management team shall carry out their work in a conscientious and professional manner devoid of potential and actual conflicts between their personal interests and the interest of HATOF Foundation and must disclose as such to immediate manager/supervisor.

## **Standards of Conduct**

- Avoid or disclose, all ethical, legal, financial, or other conflicts of interest in respect of the organization, regardless of whether such conflicts may be potential, perceived, or actual that will influence organizational decisions in a manner that leads to personal gain or advantage,
- Exercise utmost care and judgement in ensuring that HATOF's assets, resources and property rights are not misused or wasted. Assets and resources include but are not limited to intellectual property rights and other rights, staff time, information and documentation, corporate opportunities, and funds,
- Promote the organization's interests, objectives, and values in a diligent and professional manner,
- Refrain from condoning in bribery, nepotism, or other forms of corruption,
- Refrain from exploiting any relationship with a national or international donor/organization, partner, volunteer, or consultant for the staff member's/management's own benefit.

### **1.3.2 Transparency, reliability, and confidentiality**

It is the responsibility of all staff and management team to protect and promote the smooth and consistent flow of accurate, complete, and reliable information to serve the interests of our partners, consultants, volunteers, and community groups we engage and aim to serve. Uphold the highest-level confidentiality in all dealings.

## **Standards of Conduct**

- Refrain from deceptive or fraudulent acts and practices, keep accurate records and make timely and complete disclosure of material information, subject to relevant obligations of confidentiality and data privacy protection,
- Provide honest, relevant, accurate, and timely information to all organization members and partners and act promptly to correct inaccurate communications,
- Refrain from acquiring information by dishonest, unlawful, and false means and deal with public authorities and other third parties lawfully and in good faith,
- Honor all professional individual commitments and agreements, and make all appropriate and reasonable efforts to ensure that commitments and agreements made by others to/with HATOF Foundation are also honored,
- Safeguard and respect privacy and protect confidential information. Information includes files, personal details of colleagues, partners and consultants, and proprietary information.

### **1.3.3. Equality, inclusiveness, and respect for diversity**

HATOF Foundation values diversity and strives to achieve its objectives in the firm belief that individuals and groups of people may hold diverging views on the environment and policy development as well as non-environment issues.

HATOF strives to deal with all partners, consultants, and staff fairly and equitably, and avoids discrimination in employment and contracting. Organizational policies and practices shall be aimed at creating a workplace where individuals have the opportunity for professional and personal growth, commensurate with their professional capabilities and personal goals.

### **Standards of Conduct**

- Guarantee freedom of association and of expression, promoting a responsible and constructive exchange of views, criticisms, and ideas,
- Treat no individual less favourably than others because of culture, colour, national or ethnic origin, gender, marital or other family status, socio-economic status, age, disability, political and/or religious belief or lack thereof,
- Provide equal opportunities in all human resource aspects and comply with relevant laws and regulations,
- Ensure that all staff are evaluated for performance in a fair, uniform, and timely manner and that they are recognised, promoted, rewarded, or sanctioned accordingly,
- Identify and remove when reasonably possible those obstacles that prevent the best performance of staff,
- Deal fairly in all transactions, providing equal opportunity to similarly situated partners, consultants, and volunteers,
- Understand and accept cultural diversity, and provide a tolerant, positive, and supportive working environment that fosters respect for diversity.

#### **1.3.4 Environmental responsibility**

A key component of HATOF's mission is its commitment to develop the skills of individuals and communities to effectively conserve, restore and utilize the integrity and diversity of nature to improve sustainable livelihoods in Ghana and beyond. HATOF Foundation is committed to demonstrating that it is an environmentally responsible organization by actively considering the consequences of decisions, policies and actions on ecosystems and the people who depend on them and striving where possible to enhance the wellbeing of people and ecosystems and to minimize negative consequences.

### **Standards of Conduct**

- Demonstrate the commitment of the organization towards sustainability and environmental excellence in all business activities by identifying and adhering to environmental best practices,
- Work with partners, consultants and third parties whose practices and principles abide by environmentally sound standards and criteria,
- Engage with partners, consultants and third parties who actively strive towards the adoption of environmental practices or where HATOF sees an opportunity for change, in line with programmatic engagement and delivery,

- Participate in actions, projects and programmes that align with environmental sustainability and human safety and wellbeing.

#### **1.4 Underlying Documents and Principles**

This Code is substantially based on HATOF Foundation's values, together with the key principles enshrined in following documents we have endorsed and embraced. This Code shall as well be read and applied in conjunction and consistent with the following resources:

- The constitution & By-laws of HATOF Foundation
- IUCN Code of Conduct and Professional Ethics for the Secretariat
- UNDP Informational Brochure on Avoiding Conflicts of Interest
- UNDP Information Security Policy
- PSEA Website: <http://www.pseataaskforce.org/>
- Code of Conduct for the Ghana Civil Service

## **PART TWO**

### **2.0 ETHICAL CONDUCT**

HATOF Foundation seeks to advance the involvement of children, youth, women, and communities in the protection of the environment and the promotion of economic and sustainable development. Hence, by working with HATOF, this goal permeates in every individual's agenda to successfully engage and work with clients, partners, governments, consultants, volunteers, and community groups.

#### **2.1 Honesty and Professionalism**

HATOF Foundation personnel must promote the highest standards of ethical and professional conduct in all engagements with colleagues, partners, consultants, volunteers, and community groups. HATOF staff and management must uphold their duties with honesty, integrity, and professionalism.

#### **2.2 Appearance**

HATOF Foundation is an official and professional organization, thereby people working with or for HATOF shall be neatly and professionally dressed at all times unless an assignment, project or programme informs the dress code or appearance of persons.

Office, event premises and ambience shall always portray the professionalism and environmental mindset of HATOF.

#### **2.3 Obeying the Law**

HATOF Foundation is an affiliate to several international organizations and also deals with national and international partners, consultants, and volunteers. Nonetheless, all personnel are expected to comply with local and international laws and honour HATOF's private legal obligations as well. No illegal activities will be waived by HATOF Foundation in any case.

## **2.4 Conflicts of Interest**

A conflict of interest is a situation in which personal interests of personnel clash, or appear to clash, with the interests of HATOF Foundation. Personnel are to avoid any conflict of interests or situations which might reasonably be perceived as giving rise to a conflict of interest in order to guarantee the integrity, impartiality, and transparency of all environmental and business actions. In particular, personnel are expected but not limited to:

- Avoid self-dealing and competing with HATOF Foundation,
- Refrain from offering or accepting payments or special considerations for the purpose of influencing the selection of consultancies, services, or employment placements.
- Avoid influencing organizational decisions in a manner that leads to personal gain or advantage,
- Refrain from receiving financial or other significant benefits as a result of personnel's position in HATOF,
- Avoid pursuing existing or potential interests that impair or appear to impair staff or management's independence and integrity in the discharge of their responsibilities to HATOF Foundation,
- Refrain from giving unwarranted preferential treatment to any colleague, client, partner, volunteer, or third party.

### **2.4.1. Gifts, Awards and Courtesies**

HATOF recognizes that there are legitimate and lawful reasons to accept or provide reasonable business courtesies. Employees may accept unsolicited gifts, other than money, that conform to the reasonable ethical practices of the marketplace, including:

- Flowers, fruit baskets and other modest presents that commemorate a special occasion.
- Gifts of nominal value, such as calendars, pens, mugs, caps, and T-shirts (or other novelty, advertising or promotional items).

Generally, employees may not accept compensation, honoraria, or money of any amount from entities with whom HATOF or may do business. Tangible gifts (including tickets to a sporting or entertainment event) that have a market value greater than ₪100 may not be accepted unless approval is obtained from the Executive Director.

### **2.4.2 Outside Employment and External Activities**

While working for HATOF Foundation, personnel are expected to devote their full time and attention to HATOF duties and responsibilities. Personnel cannot undertake any outside work or activities that may interfere with personnel ability to carry out their role at HATOF either in terms of time and energy or by being incompatible (or perceived as incompatible) with their status as a HATOF staff/management member. However, outside activities shall be pursued if obligated by the immediate manager/supervisor or are in line with HATOF duties/assignments.

HATOF Foundation, however, generally support and approve activities that contribute to professional development and further the Organization's mission nonetheless, all personnel should guard against outside activities that may give the appearance of or create a conflict of interest. Personnel are required to obtain prior approval from HATOF Foundation before engaging in any outside activities, whether paid or not.

### **2.4.3. Political Activities**

HATOF does not reimburse directors, or employees for political contributions and does not make political contributions. If an employee wishes to participate in political activities, this should be done during non-working hours, away from and without use of HATOF property, and in such a manner that HATOF would not be perceived to be associated with or endorsing such political activities.

### **2.4.4. Lobbying Activities**

Without prior approval of the CEO, no employee may officially represent HATOF in making contacts on our behalf with any federal, state, or local government official or member or employee of a legislative body or government agency for the purpose of influencing policy, legislation, agency rules or regulations or any other official action. In connection with lobbying efforts, HATOF or certain of its employees may have to register with the appropriate government entity.

### **2.4.5. Equal Opportunity for All Employees**

The company is an equal employment opportunity employer. Employment opportunities are available regardless of race, color, sex, religion, national origin, age, disability, or other legally protected status. This Principle applies to all aspects of the employment relationship, including recruiting, hiring, training, work assignment, promotion, transfer, termination, and wage and salary administration.

## **2.5. Protecting HATOF Resources**

HATOF Foundation possesses assets and resources that aid in operation of environmental and business actions. Personnel shall be responsible for the appropriate use and protection of HATOF assets and resources including but not limited to, computer systems, telephones, vehicles, and stationery. Personnel shall ensure wise utilization of organizational property and prevent waste and misuse for the benefit of HATOF, partners, people, and community groups we engage with. HATOF assets include not only money and physical items, but also intangibles such as time, information, and technology.

### **2.5.1 Money**

HATOF Foundation funds are received from national and international donors/non-governmental organizations, charitable organizations, and individual donations for specific objectives and purposes. Personnel shall not misuse HATOF funds (nor permit misuse) by spending monies on matters unrelated to the actions and activities of HATOF Foundation, or by engaging in wasteful

or inefficient expenditure. Equally, any submission of claim by personnel for any personal benefits, entitlements, or work-related expenses including health insurance claims or non-cash benefits such as sick leave, the claim or expense must be truthful, reasonable, and supported by appropriate documentation.

- No monies/loans shall be contracted on behalf of HATOF Foundation unless authorized by the Chief Executive Officer or a resolution of the Board of Directors.
- No personnel shall enter into any contractual agreement with any Body or party unless authorized by the Chief Executive Officer.

### **2.5.2 Physical Assets**

Properties and assets of HATOF Foundation are intended only for official HATOF environmental and business purposes. Personnel shall be responsible for the professional use and reasonable care of the items they are assigned to for work duties such as computers, mobile phones, and vehicles. Office supplies or other HATOF materials shall not be used for personal purposes – even if the item seems small.

### **2.5.3 Vehicles**

HATOF Foundation vehicles are only to be used for HATOF official business purposes and cannot be used for assignments/activities unrelated to HATOF work unless specifically permitted by the Chief Executive Officer/Deputy Chief Executive Officer and full costs are recorded including fuel, insurance and vehicle wear and tear. Similarly, personnel shall not request a colleague or subordinate to use a HATOF vehicle for personal benefit. Any personnel in use of an organization vehicle shall always remember to use seatbelts, and obey local traffic rules, including speed limits and parking restrictions.

### **2.5.4 Time**

HATOF's personnel are its greatest asset. Personnel shall manage time efficiently and apply to all duties with maximum productivity and competence to best contribute to the effectiveness of the Organization. Managers/supervisors shall not ask, require, or permit subordinates or co-workers to spend working hours on non-Organization activities/assignments and likewise shall a manager/supervisor not abuse his/her authority, or colleagues' good will, by asking for personal favours during working hours. HATOF staff and management members shall endeavour to dedicate their full time and attention to HATOF tasks and responsibilities and must not let any outside activities (even where the activity has been approved) affect their ability to perform any HATOF function.

### **2.5.5 Office Technology**

Office technologies of HATOF Foundation including telephones (including mobile phones), computers, laptops, e-mail, printers, Internet, and other technologies are intended for official business purposes.

- HATOF has the right to monitor and review all information contained in these systems, including emails. As such, HATOF staff and management members have no right of privacy when using HATOF systems and equipment.

- Any improper use (e.g., sending harassing, insulting, or illegal email, streaming or downloading movies using the HATOF internet connection) is prohibited. Abuse or over-use will not be permitted (for example, making long-distance personal telephone calls at the Organization’s expense, or run off dozens of copies of flyers/documents for personnel local charity).
- Personnel shall not access systems to which they are not authorized or help anyone else to do so.
- Use personnel assigned password to access individual computers (never sign on as someone else), and personnel shall not share password or leave it visible to others.
- To protect HATOF information from inadvertent disclosure, personnel shall lockout computer even if it is left for only a few minutes (just press Control + Alt + Delete at the same time).
- No personnel shall “borrow” a colleague’s password, credentials, etc., neither shall he/she loan anyone his/hers.
- Personnel are prohibited from using HATOF’s IT resources to access, send, copy, or forward any material that is harassing, offensive, sexually oriented, illegal, or defamatory, e.g., no viewing of pornography, no e-mailing inappropriate jokes.

### **2.5.6 Data and Records**

HATOF maintains many business and financial records in a variety of formats, including paper, digital, and other hence, staff and management members shall cooperate in accurate record-keeping of the Organization’s data. HATOF data and records shall be managed but not limited to the following:

- Properly code or label information confidential or proprietary as warranted to protect it from intentional or inadvertent disclosure.
- Do not damage, delete, alter, conceal, or create false or misleading data, documents, or other records of the Organization.
- Prepare and deal with all records truthfully, and sign or enter records only to the extent known to be correct and have authorization or instruction to do so.

### **2.5.7 Confidential Information**

Information pertaining to partners, government agencies, donors, consultants, people, and community groups we engage with shall remain confidential. Personnel shall not disclose HATOF confidential or proprietary information (that has not been made public) to anyone outside or inside HATOF, except those within HATOF with a legitimate need to know as part of their official duties, as appropriate in the normal course of work, or as authorized by your manager/supervisor. All personnel, partners, volunteers, and consultants shall exercise the utmost discretion regarding all HATOF work. If information has not been made public, it may be confidential – if in doubt, consult your manager/supervisor.

## **2.6. Protecting HATOF's Interest and Reputation**

### **2.6.1. Your Position**

We should all feel proud of our work at HATOF. However, do not exaggerate your position or abuse it for personal benefit. Do not intentionally misrepresent your function, official title, or overstate the nature of your duties to anyone, including Member States, external entities, or the public we serve. Do not use your position as a means of convincing or coercing someone to provide you favorable treatment.

### **2.6.2. Digital, Media, Publications and Public Speaking**

HATOF uses both traditional and digital media, such as Facebook, Twitter, and web pages as critical tools to inform the public about, and engage interest in, our work. If speaking to the media, posting on social media, or publishing (digitally or otherwise) is part of your official HATOF duties, you must not advance your personal point of view or support a position on a matter that is not supported by the Organization.

If speaking to the media, posting on social media, or publishing (digitally or otherwise) is not part of your official HATOF duties, you do not speak for the Organization. Retweeting a HATOF tweet is acceptable, but embellishing it is not.

If you are not speaking on behalf of the Organization, before considering speaking to the press, issuing statements, taking part in media productions, or submitting books, articles or other material for publication or electronic dissemination related to the work of HATOF, you must seek and obtain prior approval by the Organization. Remember that you must remain impartial, and any positions you advance must not be inconsistent with HATOF's view on the topic or incompatible with your status as a HATOF staff member, or Volunteer. Even then, you must make it clear that what you are expressing are your personal views and not necessarily those of HATOF.

When using social media for personal purposes, it is advisable to add a disclaimer in your social media profile that your views are personal and do not necessarily reflect the endorsement of your employer. Use care, discretion and good judgment when posting and leaving comments on social media sites. Do not use the HATOF logo or indicate an official connection with HATOF so as to avoid confusion. Avoid political or other controversial or offensive statements, or criticisms of any government, and remember that your statements should reflect your independence, impartiality, and loyalty to the HATOF; our obligation to remain impartial transcends contract status. Be careful not to publish HATOF confidential or proprietary information.

Do not publish anything that you would not want to see reported in the news, and certainly nothing that can serve to harm the Organization's reputation. Use good judgment and professional discretion; do not engage in any social media activities that can serve to embarrass you, your co-workers or HATOF.

### **2.6.3. Intellectual Property**

During the course of your HATOF work, you may generate programs, documents, communications, presentations, or other work products. The intellectual property of work you

develop in the course of your official functions including title, copyright, trademark, and patent rights, belongs to HATOF. Similarly, you may develop or purchase software solutions for HATOF. Remember to protect all such intellectual property as any other highly valuable asset of the Organization. You may not copy software licensed to, or developed for, HATOF for your personal use, or even for official use if you do not have the appropriate software license to do so. We must always ensure the quality and integrity of all our work, but also take care not to infringe on the intellectual property rights of others. You may use other organization's information or creations only if you have received consent, or if it is publicly available without restriction. Do not install, copy, or download information or programs if you do not have a license to do so, and do not install, copy, or download illegally or pirated copies, or otherwise violate licensing agreements or copyright law.

#### **2.6.4. Financial Reporting**

All transactions of the Company must be duly recorded so as to permit the preparation of clear financial statements in conformity with generally accepted accounting principles. No false or misleading entries may be made in the books and records of the Organization for any reason, and no employee may engage in any arrangement that results in such a prohibited act.

No undisclosed or unrecorded fund or asset of HATOF may be established for any purpose. No payment on behalf of the Organization (including those by cash) may be done without adequate supporting documentation or made with the intention or understanding that any part of such payment is to be used for any purpose other than as described by the documents supporting the payment.

From time to time, HATOF may publish or inform of policies on financial reporting, disclosure, and compliance to reinforce the financial reporting expectations in this policy.

#### **2.7. Dealing with Third Parties – External Partners, Donors, NGOs**

HATOF often engages third parties, including international institutions, NGOs, partners, or private sector organizations. We must be certain to conduct due diligence before contracting with any such entity or individual in order to ensure we avoid engaging in business transactions with parties who do not meet HATOF's expectations with regard to ethical behaviour and business practices; a simple "Google search" is not sufficient. Remember to vet principals and owners of the entities as well.

Take care to consider whether the proposed relationship would create the appearance that HATOF is not objective or that we are playing favorites: Are you affiliated somehow with the external party? Do you have a conflict of interest? If so, HATOF can suffer reputational damage. The same goes for entities that offer pro bono contributions or donations. And remember - you may not sign any contracts on behalf of HATOF unless you have appropriate authority to do so, and any deviations to standard contracts have been approved by the CEO.

#### **2.8. Behavior Towards Others – Respect and Tolerance**

As one of the most highly respected international humanitarian organizations, we are expected to help set the ethical tone for the world to follow. Our behaviour must be exemplary and a model for others to emulate. As such, we expect you to demonstrate at all times respect, tolerance and professional behaviour towards your colleagues and others, both within and outside of the Organization. Your behaviour reflects directly on HATOF and impacts on our international credibility and reputation. That, in turn, has an effect on the willingness of donors to continue supporting our efforts and how well the Organization will be able to carry out its objectives in the future.

### **2.8.1. Encourage Diversity**

We all come from different backgrounds and cultures – this is what makes HATOF such an exciting and dynamic place to work. Demonstrate respect for your colleagues and management, and the public we serve, including those whose languages, religions, cultures, and customs differ from your own. That said, as part of HATOF, we also have an obligation to protect human rights.

### **2.8.2. Environment, Health and Safety**

Our commitment to protecting the environment and providing a safe and healthy workplace for our employees and other business partners is one of our core values. No job is so important, and no task is so urgent, that necessary steps cannot be taken to assure the safety and health of our employees and business partners. HATOF prohibits the possession of firearms, guns, explosives and any other weapons of any kind, as well as ammunition while on HATOF premises unless such prohibition is otherwise precluded by the laws of a particular jurisdiction, and then only to the extent expressly precluded. Further, HATOF will not tolerate any acts or threats of violence against our EMPLOYEES or business partners while engaged in business on behalf of or with HATOF, whether on or off HATOF premises.

### **2.8.3. Drugs and Alcohol**

The misuse and abuse of drugs and alcohol, both legal and illegal, interferes with a safe, healthy, and productive work environment and is prohibited.

HATOF prohibits the use, possession, distribution, or sale of illegal drugs by its personnel. Generally, personnel are not to conduct HATOF official duties while under the influence of illegal drugs or alcohol. Of course, prescribed use of prescription drugs is permitted, provided that its use does not impair the employee's ability to safely perform the essential elements of his or her work and does not place the individual or others at risk.

## **2.9. Conduct Outside of Work and Post-Employment Restrictions**

### **2.9.1. Outside of Working Hours**

In earlier sections of this Code, we have discussed outside activities requiring prior approval, social media, and public speaking. However, it is also critical that you understand your HATOF obligations do not end at the conclusion of the workday. How you comport yourself in your private

life reflects upon how others view HATOF. We expect that all personnel will embody HATOF's values in all that they do and say both inside and outside of the workplace. Your appropriate behavior and obligations as an impartial, independent representative of HATOF transcend your work hours. You must not act in ways that can bring disrepute to the Organization, compromise its interests, or undermine its position. As noted earlier, you are also expected to obey local laws and honor your private legal commitments.

### **2.9.2. Post-Employment Restrictions**

Whether you resign, retire, or are involuntarily terminated, your obligations of confidentiality do not cease when your service ends. You have a perpetual obligation to maintain the confidentiality of proprietary and other non-public information that came to your knowledge through your work at HATOF. Additionally, there are no specific restrictions that may affect your ability to accept certain jobs after your employment with HATOF ends.

## **PART THREE**

### **3.0 COMPLIANCE WITH CODE OF CONDUCT**

Integrity is doing the right thing, the seed for achievement. All HATOF Foundation staff have the obligation to read and acknowledge the principles and standards of conduct set forth in this Code and to raise any issues and concerns pertaining to the Code through appropriate channels as provided for hereunder. All managers/supervisors have the obligation to consider seriously all reports of ethical misconduct made by staff, and to assist staff members in these matters by providing information and advice and by responding promptly and systematically to staff queries and concerns.

All staff members are responsible for:

- reading, acknowledging, and putting into practice the principles and standards established in this Code, and
- when in doubt about the ethical implications of an action or an omission, firstly seeking clarification and advice from their Human Resources officer, and then, if necessary, the Deputy Chief Executive Officer.

**Managers/Supervisors are also responsible for:**

- addressing and clarifying ethical issues and conduct, including where necessary referring to the Deputy Chief Executive Officer matters that are brought to their attention,
- ensuring that subordinates are aware of the Code's existence and content and promoting its application,
- ensuring that reports of misconduct or unethical behaviour brought to their attention are properly reported as per the process defined below.

Partners, Consultants, Volunteers and third parties are responsible for:

- ensuring compliance with all HATOF ethical conducts in all dealings with the organization as stated in project/programme Contracts or Terms of Reference.
- ensuring confidentiality, integrity, and professionalism in dealing with HATOF Staff and management members.

The Deputy Chief Executive Officer is responsible for:

- ensuring ultimately that staff are aware of the contents and objectives of the Code,
- addressing and clarifying ethical issues that are brought to his/her attention, and
- assisting managers/supervisors in the process of staff education and development concerning the Code.

The Chief Executive Officer has overall responsibility for:

- guaranteeing fair treatment regarding the application of the Code,
- ensuring the appropriate organizational response in the case of reported or suspected misconduct or unethical behaviour,
- ensuring all reasonable allegations are treated seriously and systematically, and properly investigated, and
- determining the course of action and where appropriate asking the Ethics Committee to investigate.

### **3.1 The Ethics Committee**

The Ethics Committee is an advisory body which shall be convened by the Board of Directors headed by the Chief Executive Officer wherever it deems appropriate but at least once a year. The Board of Directors shall appoint an Ethics Committee composed of three staff members. The appointment will normally be for a period of three years. The staff members' names shall be disclosed to all staff.

#### ***Functions of the Ethics Committee***

The Ethics committee shall:

- advise the Chief Executive Officer on issues concerning this Code and maintain this Code in compliance with best practice;
- review allegations and, where necessary, conduct investigations of cases of misconduct and/or unethical behaviour as formally requested by the Chief Executive Officer;
- make recommendations to the Chief Executive Officer concerning disciplinary actions or sanctions for misconduct, according to local labour laws and regulations;
- report once a year to the Chief Executive Officer on the status of the Code implementation within the organization, its appropriateness and efficiency, the results of the allegations and investigations, if any, as well as compliance of the Code with best practice and any proposed modifications to be considered; and
- maintain a secure permanent written and/or electronic record of their work in such a way as may be necessary.

Members of the Ethics Committee shall withdraw from an investigation or review of a case where they find themselves to be in a conflict of interest. The Chief Executive Officer shall then nominate another member of staff free of conflict to act as a member of the Committee for the relevant investigation or review.

### **3.2 Reporting Wrongdoing/Ethical Misconduct**

HATOF management must maintain an open-door, speak up culture, where staff and other personnel can approach them with concerns of any sort, without fear that they will be punished for doing so. Any person who suspects or sees a HATOF staff member or other personnel, or a partner, government official, NGO or anyone else is acting or has acted improperly (or if information is received from a credible source that insinuates there may be improper activity taking place, such as harassment, fraud or corruption etc.), he/she has an obligation to report the suspected misconduct without fear of reprisal or retribution.

- i. The report must be factual and not speculative, conclusive, or judgmental and must provide all relevant information of which the reporter has knowledge in order for the appropriate assessment of the nature, extent and urgency of the necessary inquiries and other procedures.
- ii. The reporter shall not contact the suspected perpetrator to get facts or demand restitution, discuss the cause facts or allegations with anyone inside or outside HATOF Foundation other than those to whom the report will be made.

Ordinarily, a concern of ethical misconduct should be reported to your immediate manager/supervisor. However, if the concern in question relates to your manager/supervisor, or if he/she fails to provide evidence that the complaint has been reported to the Deputy Chief Executive Officer within five working days, you may contact the Ethics Committee.

Alternatively, a reporter may disclose a misconduct anonymously through the Office line and email.

*Office line: +233 (0) 559065973*

*Email: [atenviron@hotmail.com](mailto:atenviron@hotmail.com)*

*The Ethics Office cannot be compelled to disclose matters with regard to misconduct reportage. Any staff/personnel who reports false misconduct or has knowledge of ethical misconduct and fails to report as provided in the Code may be subject to disciplinary action.*

## **PART FOUR**

### **4.0 SEXUAL HARASSMENT AND RELATED ISSUES**

#### **4.1 Sexual Harassment, Exploitation and Abuse**

“Sexual Harassment” shall refer to any unwelcome sexual advance, request for sexual favor or other verbal, nonverbal or physical conduct of a sexual nature that interferes with work, is made a condition of employment, or creates an intimidating, hostile or offensive work environment.

Sexual exploitation includes any actual or attempted use or abuse of a position of power or trust for sexual purposes, including but not limited to profiting financially, socially, or politically from the sexual exploitation of another.

Sexual abuse includes an actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

HATOF Foundation has a zero-tolerance policy for the Protection against Sexual Exploitation and Abuse (PSEA). Persons working with or for HATOF shall be prohibited from taking advantage of or exploiting others for sexual or other illicit purposes, both in the workplace and outside.

- Individuals shall not exchange money, employment, food, goods or services or other preferential treatment for sex, sexual favors or other exploitative behaviour
- Sexual activity with persons under the age of 18 is also prohibited, regardless of the local age of majority or of consent. Mistaken belief of the age of a person is not a defense.
- Management members and Directors shall treat their colleagues and staff with courtesy and respect, promoting a positive work environment without harassment, including sexual harassment, or discrimination.
- No personnel of integrity shall engage or support any illegal, exploitative, abusive, or unethical activities that violate human dignity or contravene human rights standards towards HATOF partners, colleagues, government officials, volunteers, consultants, people, and community groups we serve and engage with.
- A consensual sexual and/or romantic relationship with a work colleague may not cause harm to either party and may not have detrimental professional consequences. However, staff in supervisory or positions of authority should be aware of the difficulties that may arise and the possible negative perception of other staff when such a relationship with a subordinate is entered into. Such difficulties include and not limited to:
  - maintaining proper boundaries between professional and personal life,
  - exhibiting bias in performance assessments,
  - compromising on correct professional decisions or negatively impacting team relationships in the working environment.

HATOF staff, management and Directors are not to engage in any form of discrimination or harassment in any form, including sexual harassment. However, persons who find themselves in, or entering, such relationships must resolve this conflict without delay. This means that they either must not pursue the relationship or else inform their manager/supervisor of the situation.

#### **4.2 Workplace Harassment**

Workplace harassment including mobbing or bullying, is any improper and unwelcome conduct, including words or actions that can reasonably be expected to cause offense or humiliation to another person, marginalize or exclude a person, or unreasonably disrupt that person's work. This does not include, however, the legitimate application of policies or a fair and reasoned assessment

of work or job performance. Person shall refrain from inflicting workplace harassment on colleagues and other persons.

#### **4.3 Abuse of Authority**

Abuse of authority is the improper use of one's position of influence or power. HATOF personnel shall not abuse their authority or use their power or position in a manner that is offensive, humiliating, embarrassing, or intimidating towards partners, colleagues, government officials, volunteers, consultants, people, and community groups.

#### **4.4 Discrimination**

HATOF Foundation recognizes the worth and equality of all persons, without discrimination. Persons shall not engage in any unfair differential treatment or arbitrary distinction based on a person's race, ethnicity, creed, social or political background or affiliation, colour, nationality, religion, age, gender, disability, physical attributes, marital status, family size, sexual preference or orientation, social origin, class, or other similar status.

When evaluating job applicants, assigned personnel shall consider only objective, job-related criteria such as experience, skills, and integrity to determine who will best fill the needs of the Organization, through competitive, unbiased hiring.

HATOF is an organization focused on human welfare hence all persons shall reflect these beliefs in how individuals interact with one another and with the public.

### **PART FIVE**

#### **5.0 CONSEQUENCES OF NON-COMPLIANCE**

All personnel are expected to be honest and engage in good, appropriate, ethical behavior. However, HATOF encourages reporting of staff and management members who violated rules, principles and the code using the appropriate channel. HATOF shall also meet out appropriate discipline and penance to alleged personnel who are found culprits.

#### **5.1 Determining the Appropriate Course of Action**

The Chief Executive Officer will ensure that there is an appropriate response to reports of ethical misconduct. For that purpose, the following systematic steps will be taken:

- a. Managers/Supervisors shall be required to prepare a written report of the details of any suspected case of misconduct that has been reported to them, as well as the measures that were taken to address the suspected case, and forward it to the Deputy Chief Executive Officer, and the Ethics committee.
  - i. The Deputy Chief Executive Officer or alternatively the Ethics Committee will share with each other all disclosures, unless either one of them is implicated by the allegation. The Ethics Committee/Office will register the disclosure and give it an identity number for tracking purposes, and within three days of receipt of

notification of the disclosure prepare a brief confidential report for the Deputy Chief Executive Officer who then reports to the Chief Executive Officer.

- ii. If an allegation of misconduct concerns an offence towards a staff member, management and the Deputy Chief Executive Officer, the Ethics Office will immediately assess the need to provide any necessary support to such a staff member.
  - iii. If the disclosure involves misconduct by the Chief Executive Officer, the Deputy Chief Executive Officer or a member of the Ethics Committee, such person shall make the disclosure to the Chief Executive Officer directly who should arrange for a report to be prepared within four weeks.
- b. If, after review of the brief confidential report, the Deputy Chief Executive Officer considers that the matter requires further investigation, the Deputy Chief Executive Officer will direct the Ethics Office, to perform an in-depth investigation, request additional information where necessary, and provide a complete report to the Deputy Chief Executive Officer within four weeks. At the same time, the Deputy Chief Executive Officer will notify the staff members of the investigation.
  - c. Upon receiving the review from the Ethics Office, the Deputy Chief Executive Officer will provide a copy of the report to the Chief Executive Officer and determine within seven days whether a case of misconduct or unethical behaviour can be resolved directly through the delegation structure or if it needs to be referred to the Chief Executive Officer.
  - d. If the Chief Executive Officer requests the intervention of an external party, they will pursue investigations as necessary and provide a complete assessment of the case to the Chief Executive Officer within four working weeks.
  - e. The Chief Executive Officer and the Ethics Committee will consult the Legal Adviser when involvement of the police and/or external experts is necessary. Any decisions to contact police and/or external experts will be recorded by the Legal Adviser and communicated to the Chief Executive Officer and Ethics Committee. The final decision to involve the police and/or external experts will be that of the Chief Executive Officer.
  - f. When investigations have concluded on a case, the Chief Executive Officer will advise the individual concerned of the course of action to be taken.
  - g. To ensure confidentiality, sharing of information (disclosure of details and identities) must be restricted to only those parties involved in the systematic steps.

Based on the assessment of the Ethics Committee and external/third party, the Chief Executive Officer will determine the necessary disciplinary actions or sanctions for misconduct, if applicable, in accordance with local labour laws and regulations.

## **5.2 Protection from Retaliation**

HATOF Foundation actively promotes “whistleblowing”. Personnel of the organization are encouraged to come forward, speak up, speak out and raise good faith concerns of possible misconduct, fraud, corruption, harassment, abuse of authority, discrimination, or other

wrongdoing. We support an open environment where such good faith reporting is regarded as a positive action – because *you* are *protecting* the best interests of the organization.

Retaliation may include but not limited to:

- letters of reprimand and demotion,
- undesirable transfer or reassignment,
- unsatisfactory performance evaluations,
- denial of promotion,
- endorsing or otherwise condoning hostile conduct by another staff member.

Retaliation against persons who report ethical misconduct (or otherwise cooperate with investigations or other HATOF inquiries) itself constitutes ethical misconduct under the Code, as it violates the fundamental obligation of all staff members to uphold the highest standards of integrity and transparency in the best interests of HATOF.

## 6.0 GLOSSARY

***HATOF Mission:*** Developing the skills of individuals and communities to effectively conserve, restore and utilize the natural resources available in the communities for sustainable livelihoods in Ghana and beyond.

Strengthening democracy, good governance, and development by helping local populations find information needed to fight for environmental justice in their communities.

***HATOF Vision:*** A local community of young professionals creating a better world for the current and future generations through local and global actions.

***HATOF Goal:*** To advance the involvement of children, youth, women, and communities in the protection of the environment and the promotion of economic and sustainable development.

***Conflict of interest:*** A situation in which the impartiality of an employee in discharging his duties could be called into question because of the potential, perceived or actual improper and impermissible influence of personal considerations, financial or other.

***Harassment:*** Repeated, unreciprocated and/or unwelcome comments, gestures, actions, suggestions, or physical contact, based on gender, ethnic origin, or other personal characteristics that are perceived, and substantiated, as harassment and/or intimidation.

***Retaliation:*** A form of discrimination involving action(s) against an individual because he or she has reported a concern of ethical misconduct, testified, assisted, or participated in an investigation, proceeding or hearing involving ethical misconduct.

***Staff member/Personnel:*** An individual who is a party to a contract of employment with HATOF Foundation. This includes, without limitation, employees, management members, volunteers, interns, and consultants.

April 26, 2016



Chief Executive Officer