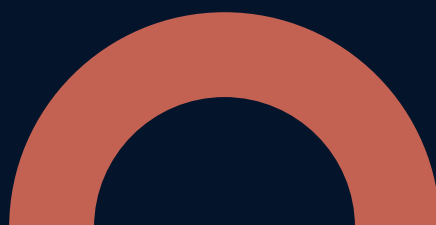


CODE OF CONDUCT

- Employees and representatives



Introduction

This Code of Conduct sets out the Norwegian Helsinki Committee's (NHC) values, expectations and requirements for ethical conduct. It applies to everyone at NHC - short- or long-term employees, external or internal consultants, students, interns and/or volunteers or anyone representing NHC (hereafter: We), regardless of location and the nature of work.

NHC employees must always comply with national legislation and international standards when acting on behalf of the organization. In cases of conflict between national and international law, international law prevails. They shall not act in a manner that could harm the NHC's interests or reputation.

Breaches of this Code of Conduct or applicable laws will be registered and dealt with by the Management Group and/or the Board. Depending on the severity of the breach, ethical misconduct or violation of the law can result in disciplinary measures, termination of employment or contract and/or reporting to relevant authorities.

The Code of Conduct is part of NHC's staff handbook, which is the responsibility of the Director of Finance and Administration. If in doubt, disclose all issues to your immediate superior/manager, who is responsible for bringing the issues to the management group.

If you want to report on a breach of ethical standards or other censurable conditions, please use the mechanism for this at the NHC website: www.nhc.no.

Diversity

NHC acknowledges and respects national and international human rights frameworks, including the ethical standards required by relevant UN and ILO conventions.

Everyone must be treated equally irrespective of gender, pregnancy, leave in connection with childbirth or adoption, care responsibilities, religion, belief, disability, sexual orientation, gender identity, gender expression, age, national origin, descent, skin colour and language or combinations of these factors.

NHC has zero tolerance towards any act of discrimination, harassment and/or bullying whether verbal, sexual, or visual.

NHC employees and representatives shall:

- Treat everyone equally and with respect.
- Refrain from any actions that can be considered as discrimination, bullying, exploitation, abuse or harassment, including actions having a sexual character.



- Refrain from inappropriate actions, jokes, remarks or any other statements or behaviour that can be perceived as intimidating or abusive.
- Respect others' personal dignity, individuality and values.
- Inform an immediate superior/manager and/or the Health and Safety representative if any form of discrimination or other abuse at the workplace is experienced or observed. For detailed instructions, please refer to NHC's Routines for internal reporting.

Anti-Corruption

NHC has zero tolerance toward any form of corruption or other economic crimes, including bribes, money laundering, improper advantages or others. NHC employees shall always remain impartial and not use their professional role in the NHC for personal gain or profit.

Acts of corruption can happen in a private or public setting, actively or passively, and both the giver and the receiver of such services can be punished for corruption. It does not matter whether the payment or other favours are made or received directly or through a third party (e.g., an intermediary, family member, partner organisation, etc.).

For NHC's gift and benefit policy, please refer to Gifts and other Benefits section below.

NHC employees shall:

- Refrain from any actions which could be perceived as favouritism or any form of corruption.
- Never offer, promise, give, demand, accept or receive improper advantage in connection with position, an office or performance of an assignment. An improper advantage is an advantage that is given directly or through an intermediary, to influence the recipient's decisions and/or to increase the sympathies towards the giver. An improper advantage can be anything of value, including but not limited to payments, gifts of more than modest value, entertainment, travel expenses or fake agreements. A benefit can be offered directly or through an intermediary. Manage projects, enter cooperation agreements and act according to the standards and regulations provided in NHC's Project and Financial Handbooks or Routines. Decisions shall always be documented.
- If a challenging situation arises, seek immediate advice from an immediate superior/manager or the Director of Finance and Administration on how the situation should be handled according to NHC regulations or national or international legislation. Such interactions are an important part of the NHC's efforts to prevent any form of corruption.



Gifts and other Benefits

NHC employees may accept personal gifts and services of courtesy if they have a minimal financial value, are not given regularly or in return for a favour and are clearly appropriate in the circumstances.

Services and/or assignments are performed on behalf of NHC when a request to perform such service/assignment are directed to you as an NHC employee, the service/assignment is fully or partially performed or prepared during NHC's working hours or if the service/assignment is perceived to represent NHC. Honorarium for such services shall entirely belong to the NHC. Services and/or assignments prepared and performed outside working hours as a private individual are not covered by NHC regulations.

NHC employees shall:

- Never accept or receive gifts or other benefits that may affect or be perceived to affect decision-making or independence. Personal gifts and other benefits can only be received if they are of modest value (as specified in the staff handbook) are not given regularly and provided that the time and place are appropriate. Personal gifts or services exceeding modest value shall be given to the NHC and reported to the Secretary General and the Director of Finance and Administration without delay. Gifts in form of cash or other type of payment, irrespective of size, shall not be accepted under any circumstances.
- Inform the Secretary General or the Director of Finance and Administration and obtain their prior approval before performing services and/or assignments to third party on behalf of NHC. Honorarium for such services shall be given to the NHC and in any case accrue to NHC's operations.
- Obtain prior approval from the Secretary General or the Director of Finance and Administration before participating in courses and/or travel under the auspices of third party. As a rule, NHC covers travel, accommodation and other travel-related expenses of its employees if not formally agreed with third party.
- Consult the Director of Finance and Administration if in doubt regarding one of the above provisions, or other situations related to gifts and other benefits.

Conflict of Interest and Abuse of Power

Conflicts of interest exists when an employee's personal interests are inconsistent with those of NHC and create conflicting loyalties.

NHC employees and representatives shall:

- Not use her or his position for personal benefit or for the benefit of relatives, friends or associates.
- Not abuse the influence or power s/he has by virtue of her or his position at the NHC.



- Carefully consider any potential conflict of interest, and in case of doubt seek direction from the Secretary General.

Confidentiality, Security and Privacy

NHC employees may through their work or position gain access to confidential, personal or sensitive information. Such information shall never be processed or disclosed externally without prior permission from the Management Group. This applies also after NHC activities are finalised or the employment contract is terminated.

NHC employees and representatives shall:

- Use working devices that may contain confidential or personal information in public places (e.g., airplanes, restaurants, elevators, etc.) with precaution.
- Avoid connecting to open or unauthorised Wi-Fi networks from working devices, especially when travelling abroad.
- Refrain from accessing or storing work related documents that may contain confidential or personal information, on other than NHC's devices (e.g., personal computer, mobile, etc.)
- Refrain from sharing confidential information outside of NHC, unless authorised by the Management Group.
- Refrain from discussing work-related topics that may contain confidential information with persons who are not NHC employees or not authorised to receive such information.
- Never give persons (who are not employees of the NHC) access to NHC's premises without supervision or a formal permission, work-related devices, documents or IT platforms.
- Change login details, and immediately get in touch with NHC's IT support team, in case of any unauthorised access to or loss of work-devices.
- Never use work-related information, including confidential information, for personal purpose or gain.
- Treat and process confidential or personal data in compliance with GDPR and other relevant data protection laws.
- Consult with the Director of Finance and Administration if uncertain on how to act regarding information obtained as an NHC employee or on which information is confidential or personal.

NHC and Representation

NHC acknowledges everyone's fundamental right to freedom of expression as well as the right to participate as individuals in the political arena. Employees shall nevertheless be cautious and avoid situations that may damage NHC's name, reputation, work or values.



NHC employees and representatives shall:

- Uphold NHC’s name and avoid any action that may discredit NHC or damage the public’s perception of NHC.
- Make clear that opinions and statements s/he expresses as an individual, both in writing or verbally, in public or in political context, are personal and do not represent NHC’s position or views.
- Consult with NHC’s Communication Section or the Secretary General to obtain prior approval before expressing opinions on behalf of NHC which are not part of already approved NHC policies.

Sponsorship and Donation

NHC is actively engaged in fundraising and receives support from a variety of sources.

NHC supports activities and organisations that share NHC’s values and policy-priorities. Donations or sponsorships must always be based on written agreements. Proposals are assessed and decided upon in line with the regulations given in NHC’s Project Management Handbook.

NHC employees and representatives shall:

- Provide accurate information to NHC’s Management Group for assessment of sponsorship agreements or donations to the NHC.
- Carefully evaluate and choose partners that shall receive financial support from the NHC. Partners receiving project support shall be monitored to ensure that their activities and ethical standards are consistent with NHC standards.
- Notify your immediate superior in case of any actual or potential breach of standards or in case of doubt.

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Place and Date

Signature

This Code of conduct is revised regularly. In case of revision, you will be asked to sign an updated Code of Conduct.

