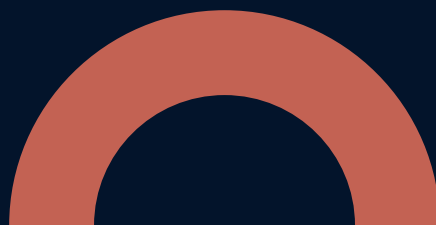


CODE OF CONDUCT

- Partners



Norwegian
Helsinki Committee

Updated 17 November 2025

Introduction

The Norwegian Helsinki Committee (NHC) is committed to upholding human rights and rule of law and therefore expects that NHC's subgrantees and subcontractors (hereafter Project Partners) share our core values and comply with the minimum standards of legal and ethical conduct described in this document.

By signing off this Code of Conduct, the project partner agrees: 1. To comply with the standards indicated in this document 2. That this Code of Conduct and any changes to this Code of Conduct are provided to relevant employees and contractors who are involved in NHC-project related activities and 3. That such employees and contractors are aware of the obligations that apply under this Code of Conduct.

Any violation of this Code of Conduct by persons working for or on behalf of the project partner may lead to relevant legal measures, including termination of contractual relationship(s) as well as all related contracts.

Diversity and principles of 'do no harm'

NHC has zero tolerance towards any form of discrimination, harassment and/or bullying whether verbal, sexual, or visual. Parties to this contract confirm that they share this standpoint in principles and practice.

We require that any project partner operate in a way that pays respect to principles of non-discrimination and equality. This means that parties to this contract confirm that their operations, both internally in their entity, and externally to beneficiaries and the wider public, do not discriminate, disfavor, or antagonize on the basis of gender, pregnancy, leave in connection with childbirth or adoption, care responsibilities, sexual orientation, gender identity, gender expression sex characteristics, religion, belief, disability, age, national origin, descent, skin color and language, other social group affiliations, or combinations of these factors.

Parties to this contract affirm that they are committed to working with do no harm principles, and that they take necessary precautions in their work, to protect people from social groups that are particularly at risk of human rights violations, such as women, LGBTIQ+ persons, people living with disabilities and others. This includes making sure that sexual exploitation, sexual abuse and sexual harassment (SEAH) is actively prevented within the scope of the party's work.



Corruption and Money Laundering

Project partners shall respect relevant laws and show zero tolerance for any form of corruption, bribery, fraud, facilitation payments, illegal gratuities or other illegal benefits. In cases of conflict between national and international law, international law prevails. Project Partners must never take part in or support money laundering in any form.

Respect for Laws and Human Rights

Project partners shall respect universal human rights, comply with relevant laws and standards, UN and ILO conventions and provide their employees with a safe and healthy workplace. In cases of conflict between national and international law, international law prevails.

Conflict of Interest

NHC expects its project partners to avoid creating or being subject to conflicting loyalties. Project partners must consider carefully, address and inform NHC of any actual, potential or perceived conflict of interest.

Financial Integrity and Compliance

Project partners must always use allocated funds in line with the project documents approved by NHC, provide NHC with accurate financial as well as any project related information. Submissions made to NHC (such as reports, contracts, payment requests and other) shall be complete and accurate. Project partners must comply with NHC's project framework agreements, terms and conditions and other governing documents.

Confidentiality

Information received in connection with cooperation and/or project-based relationship(s) with NHC shall be kept confidential unless prior written consent has been obtained from NHC. Duty to confidentiality remains after cooperation and/or project-based relationship(s) with NHC has been completed.

Intellectual Rights and Privacy

Project partners are responsible for respecting and protecting intellectual property rights of NHC and others and complying with applicable personal data protection regulations and requirements.



Whistleblowing

NHC encourages everyone who becomes aware of any conduct or situation in breach of this Code of Conduct, involving or related to the NHC, its project partners or activities, to immediately report to NHC's relevant Project Manager or the Head of Programmes at email. We ask you to provide us with accurate and full information. NHC will take necessary measures to ensure confidentiality of any whistleblower to protect her/him from possible retaliation.

By signing this document, we declare that we have read carefully and comply with this Code of Conduct for NHC project partners. We are aware that NHC may conduct an audit and/or evaluation of compliance of our practices with the standards laid down above.

Prevention of Sexual Exploitation, Abuse, and Harassment (SEAH)

All project partners, their employees, and representatives are expected to uphold the highest standards of professional and personal conduct at all times, including prevention of sexual exploitation, abuse and harassment (SEAH).

The NHC has zero tolerance for any form of SEAH.

Partners are expected to:

- Respect the dignity, rights, and wellbeing of all individuals, particularly staff members and project beneficiaries.
- Refrain from any behaviour that could be construed as SEAH, including the exchange of money, goods, services, or employment for sexual favours.
- Report any suspected or actual SEAH incidents promptly through established reporting channels.
- Cooperate fully with any investigations and actions initiated by the NHC, related to SEAH.

.....
Project Partner
(name and adress)

.....
Project Partner is Represented by
(name and title)

