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About the Code of Conduct and Ethics

The Code of Conduct and Ethics is applicable to all top and senior management officers and employees, of HumanRights360 under any kind of employment relationship, as well as to any third party collaborating with HumanRights360 either within the context of providing services or performing a project (including associates, mediators, agents and any other entity HumanRights360 cooperates with within the context of outsourcing or other kind of agreements, volunteers, interns, as well as members of Committees (collectively hereinafter as “staff” or “employees”).

HumanRights360 employees should demonstrate responsible and ethical behavior and consistently live up to the spirit and purpose of the present Code.

HumanRights360 work and success depends largely on the reputation of all its staff for integrity and high ethical standards in all operations. Integrity lies at the core of every professional relationship and for this reason staff’s conduct should be impeccable in every way.

Responsibilities

HumanRights360 staff should be responsible for having understood, observing and implementing the principles and values set out in the Code. If someone has any questions, or inquiries regarding the content of the Code, he should address these to the organization’s Human Resources Department. A statement acknowledging receipt of the Code of Conduct and Ethics must be signed by all staff.

HumanRights360’s Key values and Ethical Principles

HumanRights360 has expressed its commitment to observe integrity and high ethical standards in all of its operations.

HumanRights360 follows also professional practices that are governed by high ethical standards which ensure that its relationship with third parties are governed by respect, sincerity, reliability, honesty, consistency, equal treatment, objectivity and impartiality.

The development of high caliber staff and provision of high quality services remain a priority of HumanRights360.

HumanRights360 aims to work in teams than working individually. Without restricting the independence of employees and by defining roles and responsibilities, HumanRights360 foster team spirit in its activities and seeks to exchange views and knowledge as well as to use different perspectives for achieving the same goals.
Through experience and team spirit, HumanRights360 endeavors to act proactively.

HumanRights360 relationships are governed by transparency, as part of HumanRights360 efforts to provide accurate, fair, timely, regular, reliable and accessible information relating to issues of concern.

HumanRights360 aspires to abide by a high level of social responsibility, adhering to and promoting human values, as well as social, intellectual and cultural values.

**Reporting Violations and Seeking Guidance**

If you know of or suspect a violation of applicable laws or regulations under European Union and national legislation, of this Code or other HumanRights360 policies, immediately report that information to the organization’s Human Resources Department. HumanRights360 absolutely prohibits retaliation against employees because of a good faith report of suspected misconduct. If you have questions about this Code or any HumanRights360 policies or if you are unsure about the best course of action in a situation, contact the organization’s Human Resources Department.

**Investigations of Suspected Violations**

All reported violations will be appropriately investigated and treated confidentially to the extent reasonably possible. HumanRights360 reserves the right to determine how, and to what extent, each investigation is conducted. You have a duty to communicate honestly and cooperate fully in HumanRights360 investigations and audits. It is also important that you do not attempt to conduct your own preliminary investigations. Investigations often involve complex legal issues, and acting on your own may compromise the integrity of an investigation and harm HumanRights360.

**Violations**

Subject to applicable law, employees who violate this Code, other HumanRights360 policies or the law may be subject to disciplinary action, up to and including termination of their Contract.

**Responsibilities of supervisors**

Those who supervise others have additional responsibilities under the Code. They should:

- Set an example of ethical behavior through their own conduct and their oversight of the work of others.
- Ensure that those who report to them have sufficient knowledge and resources to follow the Code’s standards.
- Monitor compliance of the people they supervise.
- Enforce this Code and HumanRights360 consistently and fairly.
- Support employees who in good faith raise questions or concerns.

Employees often go to their supervisors to report suspected misconduct, and it is important that
they feel comfortable doing so. If you supervise others, make yourself available to hear employee concerns and respond appropriately. If an employee reports a suspected violation to you, promptly contact the organization’s Human Resources Department so that the matter can be investigated. HumanRights360 strict non-retaliation policy is critically important. As a supervisor, you have a responsibility to ensure that retaliation does not occur, which may require that you monitor applicable situations.

No Bribery

HumanRights360 rejects any act of bribery. HumanRights360 takes every measure to prevent and deter actions related to bribery. Bribery is the offer, promise, concession, submission of a request or acceptance of a privilege in exchange for an action considered illegal immoral or abusive. All HumanRights360 staff is responsible for the prevention, deterrence and reporting of such cases. As part of the effort to protect HumanRights360 reputation, every employee shall:

- Not offer or promise a financial or other benefit to any individual, government officials, civil servants, or anyone else, in order to tempt them to act irregularly or to reward the same for an irregular action/activity. For additional information, see the Anti-Bribery Policy.
- Not accept gifts in the form of cash (regardless of amount) or goods (tips, hotel accommodation, significant discounts for purchases of goods or other). Promotional low-value gifts, symbolic gifts for Christmas, Easter, anniversary or name-day, considered traditionally and socially acceptable are excluded. In any case the gift value shall not exceed 50 euro. In all other cases, employee shall report this to Human Resources Department.
- Not seek to secure any type of benefit or advantage by taking advantage of his/her employee capacity inside or outside HumanRights360.

The prohibition of bribery applies to employees as well as to associates, volunteers and providers, who have been assigned with activities within the context of an agreement.

Dealing with Government Officials

As a humanitarian, non-profit organization, HumanRights360 does not make payments or contributions to any political party, candidate for government office or campaign. In addition, we must be careful not to engage in lobbying activities without appropriate guidance and approval. Before you meet or communicate with government employees or officials to influence legislation or other government rule-making, contact the Management of the organization and the Legal Counsel for guidance.

Compliance with Donor Requirements

We are committed to satisfying the obligations that we undertake on behalf of our donors. When working on a project, you must understand the relevant donor requirements. You must know what costs are allowable and appropriate for any given project and abide by all applicable donor rules and HumanRights360 procedures, including properly completing and maintaining time sheets.

Conflicts of Interest

HumanRights360 takes all necessary measures to prevent a conflict of interest from occurring. A
conflict of interest occurs when your personal interests or loyalties interfere with the interests of HumanRights360. A conflict situation can make it difficult for you to perform your work for HumanRights360 objectively. Conflicts can include situations where, for example, you own an interest in or have an employment or consulting relationship with an organization that does business with HumanRights360, such as a supplier. Conflicts also, occur when your spouse or domestic partner, your children, parents, brothers, sisters, in-laws, or someone else with whom you have a close family relationship either is a competitor, supplier, or partner of HumanRights360 or is employed by one of them. As an employee, director, or officer of HumanRights360, you must ethically identify and disclose any actual or apparent conflict between your personal interests and HumanRights360 to the organization’s Director or supervisor, as applicable, and to the Human Resources Department.

Particularly for the Selection Process, a conflict of interest is deemed to be present when a person involved in the process (e.g. independent experts, members of the Selection Committee, staff involved in reviewing compliance with selection criteria) has direct or indirect interests that are or appear to be incompatible with the impartial and/or objective exercise of the selection duties. Such conflict of interest could arise in particular as a result of economic interest, political or national affinities, family or emotional ties, or any other relevant connections or shared interests likely to influence the impartial and objective character of the selection procedure. Depending on what the conflict may be, the person involved may be appropriate to abstain from voting on or even discussing/evaluating the matter.

Gifts and Entertainment

When you are involved in making strategic decisions on behalf of HumanRights360, your decisions must be based on objective, unbiased judgment. Accepting gifts or other benefits from applicants, suppliers or other business partners can impact our judgment. For this reason, gifts, meals, and entertainment are permissible only if they are customary and commonly accepted business courtesies (name day, Christmas, Easter, or other circumstances considered traditional and socially acceptable and offered in the context of social communication), are only nominal in value (not more than 150 euro), and are given and accepted without an express or implied understanding that you are in any way obligated by your acceptance of the gift. Gifts of cash are prohibited and must be returned. If such situation nevertheless arises, the HumanRights360 member, staff, advisor, independent expert or subcontractor involved should immediately notify the organization’s Human Resources Department.

As a non-profit, humanitarian organization, HumanRights360 strongly discourages employees from offering gifts or entertainment to others. In those unusual situations when you are providing a gift or business courtesy about HumanRights360 business, you must not offer or furnish any gift that is of more than nominal value (not more than 150 euro). There are strict laws that govern providing gifts, meals, or other things of value to government officials. Do not provide anything of value to government officials or employees or members of their families about HumanRights360 business without prior written approval from the Management of the organization and the Legal Counsel.

Treating Each Other Fairly and Respectfully

Our workforce includes talented professionals from a wide range of cultures and backgrounds. HumanRights360 is an equal opportunity employer. Employment decisions – such as hiring, promotion, pay and termination – should be based on qualifications, experience, ability and performance. HumanRights360 strongly disapproves of and will not tolerate the sexual harassment of any of its employees, staff or advisors by anyone, including, but not limited to, any supervisor, coworker, visitor, vendor or grantee. Furthermore HumanRights360 strongly disapproves of and will not tolerate the harassment of any of its employees on the basis of their
race, color, religion, sex, sexual orientation, age, disability, marital status, national origin, military status, gender identity, pregnancy, genetic characteristic or any other characteristic protected by applicable law. HumanRights360 is committed to maintaining a work environment that is free of harassment and discrimination. HumanRights360 insists that it is the responsibility of all its employees and staff to assist HumanRights360 in providing a workplace that is free from sexual and other unlawful harassment at all times by reporting incidents of such behavior to the Human Resources Department located at Headquarters.

We will not tolerate inappropriate conduct that interferes with job performance, diminishes the dignity of any person, or creates an intimidating, hostile or offensive work environment. This includes harassment of employees or others based on race, gender, age, sexual orientation, or any other protected class under applicable law. If you believe that you have been subjected to harassment or discrimination of any kind, promptly report the incident to the Human Resources Department located at Headquarters.

Safety and Security

Because our work often takes us to difficult parts, the safety and security of our employees must be our top priority. Healthy and safety in the workplace remain a priority for HumanRights360 in order to ensure a safe working environment, enhance the quality of employees’ professional life, and prevent any associated risks. You are never expected or encouraged to jeopardize your personal safety or that of any colleague, partner, or beneficiary. In addition, possession of firearms or other weapons is prohibited. HumanRights360 has adopted safety and security policies and protocols that are designed to keep you safe, as well as training, as regards response actions, especially in case of natural disasters, on this topic and prepares proactive action plans for the purposes of fire safety and crisis management. Take it seriously and comply with HumanRights360 policies in this area. For additional information, see the Policies on Safety and Security.

Sexual Exploitation and Abuse

Sexual exploitation and abuse by HumanRights360 staff is absolutely prohibited. Sexual activity with a person under age 18 is prohibited regardless of the age of consent locally. Employees are also prohibited from having sexual relationships with beneficiaries, as these relationships are often based on unequal power dynamics and may undermine the credibility and integrity of our humanitarian work. You must report any suspicions of sexual exploitation or abuse, whether committed by a staff member of HumanRights360 or of another organization. See the Policy against Sexual Exploitation and Abuse.

Alcohol and Drug Free Workplace

HumanRights360 is committed to maintaining a safe and healthy work environment free from the influence of alcohol and drugs. You are expected to report to work free from the influence of alcohol or non-prescription drugs.
Protection and Proper Use of HumanRights36 Assets

We each have a duty to protect HumanRights36 assets from damage and ensure their efficient use. Theft, carelessness, and waste have a direct impact on the services we can provide to beneficiaries. Except as specifically authorized, HumanRights36 assets, including equipment, materials, resources, proprietary information, and staff time, must be used for its activities only, and not for personal use. For further information, see the Fraud Policy.

Accurate Books and Records

HumanRights36 work is funded by government agencies and private donors, all of whom require HumanRights36 to make and keep accurate books and records. You must complete all HumanRights36 documents accurately, truthfully, and in a timely manner, including documents related to hours worked and all travel and expense reports. You must record HumanRights36 financial activities in compliance with HumanRights36 policy and accounting practices. Never create a false or misleading report or record or make a payment or establish an account on behalf of HumanRights36 for a purpose other than as described by the supporting documents. For further information, see the Fraud Policy.

Anti-Fraud Policy

HumanRights36 is exposed to the risk of fraud and illegal activities of any time, which, if not addressed in a timely and effective manner could have negative effects on its activities. HumanRights36, aiming at combatting the phenomenon of fraud has enacted a comprehensive Anti-Fraud Policy. This Policy is applied to all the staff of HumanRights36 and its main points are summarized as follows:

- Awareness of employees of HumanRights36 regarding the fraud prevention and combatting
- Staff training and formation on a unified professional behavior and culture for fraud prevention
- Definition and description of the relevant actions that must be taken by HumanRights36 in the event of fraud
- Development of systems, procedures and control mechanisms that assist in the prevention and avoidance of fraud.

Records Maintenance

HumanRights36 creates and receives large numbers of records. Our contracts and applicable laws require that we retain various records for certain periods of time. We must comply with the law and HumanRights36 policy regarding the maintenance of HumanRights36 records.

Information Sharing, Confidential Information and Privacy

HumanRights36 operates with the presumption that information generated through its grantmaking activities, as well as information about its operations, should be publicly available in
a timely and understandable fashion. HumanRights360 hopes that this presumption of openness will inform about the work of others, encourage transparency within the non-profit sector, enrich public debate and foster a better understanding of issues important to the Greek civil society. To this end, HumanRights360 makes information available through multiple means, including its website, press releases, capacity building workshops, periodic reports, descriptive summaries of grantmaking initiatives and public statements.

At the same time, HumanRights360 seeks to protect relationships of trust with applicants, grantees and employees and preserve zones of confidentiality for planning and deliberations. HumanRights360 balances these needs against presumption that information about its works and operations should be publicly available.

However, sensitive information, are examples of confidential information. Considered as “confidential” is information that comes to the attention of employees, whether directly or indirectly, during the course of their work. HumanRights360 takes every measure to ensure such confidentiality of sensitive information and commits to protect confidential information and to use such only for the purpose they are initially provided. All staff must maintain the confidentiality of information entrusted to it by HumanRights360 and its beneficiaries and other business partners. HumanRights360 also complies with the many data privacy laws around the world. HumanRights360 depends on its staff to help respect privacy by only accessing confidential employee data with proper approvals and on a need-to-know basis and not repeating or discussing information with anyone who is not approved to know such information. Your obligation to treat information as confidential does not end when you leave HumanRights360. Upon the termination of your employment or other engagement with HumanRights360, you must return everything that belongs to HumanRights360, all documents and other materials containing HumanRights360 and beneficiary confidential information.

Computer and Communication Resources

We must secure our computers and all HumanRights360 computer and communication resources. In addition, when you are using HumanRights360 resources to send e-mail, or to access Internet services, you are acting as a representative of HumanRights360. Improper use of these resources reflects poorly on HumanRights360 and exposes us to liability. HumanRights360 computer and communication resources are the property of HumanRights360 and are intended for use by staff to conduct HumanRights360 business. To the extent permitted by applicable law, HumanRights360 reserves the right to monitor these resources. To this end, you shall not install or use software, apart from those installed by HumanRights360, in line with its system security requirement. You must use the internet for work purposes and within the context of your duties, without compromising the security of the system. The staff’s access to social media from HumanRights360’s systems is prohibited, unless prior written authorization is granted by the competent officer. You must ensure that the IT equipment is used only by authorized individuals, even when their desks are left unattended for just a few minutes. You must safeguard your access codes to the HumanRights360’s system and under no circumstances disclose such code to others.

Social Media Guidelines

Social media includes all means of communicating or posting information or content of any sort on the Internet, including but not limited to your own, or someone else’s blog, journal or diary, personal web site or newsletter, social networking or affinity web site, web bulletin or a chat room, video or wiki postings, sites such as Facebook and Twitter, chat rooms, whether or not associated or affiliated with HumanRights360. HumanRights360 respects the right of its employees to use social media as a means of self-expression; however, we ask that you observe the following guidelines when posting:
• If you choose to identify yourself as an HumanRights360 employee, please understand that some readers may view you as a spokesperson for HumanRights360. Inform your readers that the views you express are yours alone and do not necessarily reflect the views of HumanRights360.
• Make sure that the information you are posting is true.
• Do not post or disclose HumanRights360 confidential or proprietary information, including but not limited to program and financial information, or organization-issued documents, as set forth in the Confidential Nature of HumanRights360 Affairs policy.
• Do not post, unless authorized in writing by HumanRights360, the following information:
  o photographs of beneficiaries, unless you have explained to them that their image might be disseminated locally and globally, and have obtained their permission (if a minor, permission from their parent/guardian) and the written consent of the Management of HumanRights360.
  o any copyrighted works of HumanRights360.
• Be respectful to HumanRights360, our employees, beneficiaries, partners, and affiliates.
• Ensure that your online conduct does not violate HumanRights360 discrimination and harassment prevention policies

Voluntary Activity

HumanRights360 has a special respect for voluntary work. HumanRights360’s policy is to encourage volunteering by staff members who so desire. At the same time, HumanRights360 has to ensure that organizations with which staff is affiliated as volunteers have no unfair advantage in the competition for grant support.

Positions - Politics

Is staff members serve on other organizations or organisms, such fact must be disclosed to the Human Resources Department located at Headquarters.

If a staff is invited to serve on a civil task force or committee dealing with public policy issues, the staff member shall disclose this to the Human Resources Department which will decide accordingly.

Fund-Raising

Members, staff and independent advisors of HumanRights360 may confront delicate situations especially when they are asked to help with an organization’s fundraising. They should feel free to provide such help however by making it clear that they are not acting nor representing HumanRights360 in such actions. In case of such affiliation, this should be disclosed to Human Resources Department.
Communication – Publicity

Only authorized staff of HumanRights360 may accept invitations from organization to speak or contact media representatives, authorize or send letters or other similar announcements for publication wherever. Non authorized staff shall avoid verbally addressing the media as representatives of HumanRights360, being interviewed or writing articles and making publications, announcements and in general statements (written/oral) related to HumanRights360 and its activities without the prior authorization of HumanRights360.

Intellectual Property

HumanRights360 activities may result in tangible products of intellectual property, such as reports, papers, manuals, photographs, videos, documentaries, etc. HumanRights360’s policy is to ensure that all products of intellectual policy created during the course of its activities benefit the public and the non-profit community. To that end HumanRights360 seeks prompt and broad dissemination of all products of intellectual property at minimal cost or, when justified, at a reasonable cost.

HumanRights360 encourages openness in research and freedom of access to underlying data and products of intellectual property created by HumanRights360. Project Promoters are also encouraged to explore opportunities to use existing and emerging internet distribution models, and, when appropriate, open access journals, Creative Common licenses and rights or similar mechanisms that result in broad access for the interested field and public.

Nevertheless, HumanRights360 recognizes there may be circumstances where limited or delayed dissemination of intellectual property products, or limited access to data may be appropriate to protect legitimate interests of third parties or itself. Such circumstances shall be evaluated on a case-by-case basis.

Remember

Ultimate responsibility to ensure that HumanRights360 complies with the many laws, regulations and ethical standards affecting our work rests with each of us. HumanRights360 depends on you to conduct our work ethically so that we can continue helping people and doing the important work that we do.

No Rights Created

The Code of Conduct and Ethics is a statement of policies for individual and professional conduct and does not, in any way, constitute an employment contract or an assurance of continued employment. The Code is not intended to and does not create any obligations to or rights in any employee, volunteer, client, supplier, competitor, donor or any other person or entity.

Implementation

Every employee, advisor, staff, etc. of Humanrights360 shall respect and duly observe this Code. All these people undertake the responsibility to prevent actions which may not be in line with HumanRights360 commitments within the context of this Code. There are various ways in which people can make inquiries regarding implementation of the Code or report possible misconduct without the risk of incurring sanctions as a result of making such
Reports:

- Employees etc. are entitled to express their concerns and report code-related issues to Human Resources Department which is duty bound to oversee the proper implementation of the Code and to provide guidance regarding how to handle any kind of breach of the Code.
- Employees etc. shall immediately report to Human Resources Department any issue/information relating to possible breach of the principle of zero tolerance of bribery and corruption.

HumanRights360 reviews the submitted reports, adopts corrective measures and if it is found that a breach of this kind has occurred, HumanRights360 imposes penalties.

It is noted that HumanRights360 takes every measure to protect the identity of any employee or staff who may report in good faith a possible violation of the said Code.

Revision of Code

HumanRights360 reviews the Code annually in order to ensure that is it appropriate vis-à-vis the principles adopted and the rules implemented by HumanRights360, and in the event that its revision is deemed necessary, a relevant revision is executed.

In the event that the Code is modified, HumanRights360 provides for prompt disclosure of the revised Code to the staff in any way HumanRights360 sees fit.

Publication of the Code

The Code is available on HumanRights360’s on the Intranet in Greek and English, as well as at HumanRights360’s offices. HumanRights360 thereby seeks to enhance transparency as every interested party has the opportunity to access and assess the core values, rules and principles that govern the operation of HumanRights360.