

Employee Code of Conduct

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Policy owner	Chief Operating Officer
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Introduction

The Employee Code of Conduct outlines FSD Kenya's policy and expectations with respect to employees' behavior towards their colleagues, supervisors and all members of the organization. The Code of Conduct sets forth our core values, shared responsibilities, commitments and promises.

Our reputation is fundamental to our success. Unacceptable and unprofessional behavior will impact your colleagues, our partners and can lead to reputational damage. This can seriously endanger our future because we depend on our reputation for funding.

This means that you must be highly aware of the possible consequences of your actions, both during and after working hours.

Failure to comply with our code of conduct can lead to disciplinary action and dismissal.

Scope

This Code of Conduct is your first resource for knowing how best to fulfill your responsibility to understand and follow our core values. Our values – professional, excellence, empathy, enthusiastic, diversity, impact oriented, innovative and integrity – describe who we are and what we do to achieve our mission. The Code of Conduct applies to every employee of FSD Kenya, regardless of the title, stature or tenure. Every person, upon joining the organization and annually thereafter, must confirm in writing that he or she has reviewed the Code of Conduct, and understands and agrees to it.

Policy elements

FSD Kenya employees are bound by their contract to follow the Employee Code of Conduct while performing their duties.

The components of the Code of Conduct are:

1. Compliance with the law

FSD Kenya is committed to complying with applicable local and international laws and regulations.

As an FSD Kenya employee:

- a. I will comply with Staff Rules, policies and procedures, and with the terms of my employment contract and conditions of service.
- b. I will comply with relevant laws and regulations and comply with the Code of Conduct unless it is in contradiction with local laws and legislation.

2. Whistleblowing and non-retaliation

FSD Kenya is committed to addressing potential violations and protecting its partners and employees against retaliation for reporting concerns. Procedures have been set out on how suspicions or allegations of aid diversion, fraud, money laundering or counter-terrorism finance can be reported.

As an FSD Kenya employee:

- a. I will report in good faith any concerns in connection with FSD Kenya's operations and potential violations of this Code, laws, regulations, or ethical standards to the following whistleblowing hotlines that provide for anonymous reporting and are available 24/7 by

Send an email to transparency@fsdkenya.org

or to FSDspeak-up@kpmg.co.ke

or call the free hotline
number **0800 721194**

or anonymously through
the web portal: www.thornhill.co.za/kpmgethicsportal

3. Anti-harassment and abuse

FSD Kenya is committed to providing an environment recognized for its equality and diversity and treats everyone with fairness, respect and dignity. We do not tolerate any discrimination of employees or others affected by our operations.

As an FSD Kenya employee:

- a. I will conform with equal opportunity policies in all aspects of my work, from recruitment, work performance to interpersonal relations.
- b. I will contribute to a working environment characterized by mutual respect, dignity and non-discrimination.
- c. I will contribute to a working environment free from harassment and abuse, especially relating to race, religion, color, ethnicity, age, gender or sexual orientation.
- d. I will not engage in relationships or behavior that are exploitative or abusive, whether physical or verbal, that disrupts others' work performance or creates a hostile work environment.
- e. I will not engage in any form of sexual abuse or exploitation of any persons of any age.
- f. I will report any such behavior or malpractice in the workplace by others through established confidential reporting systems.

4. Safeguarding

FSD Kenya is committed to upholding a practice and culture that ensures a comprehensively safe environment for all people the organization engages with. This includes children and vulnerable adults.

As an FSD Kenya employee:

- a. I will not employ children in any manner that is economically exploitative, or is likely to interfere with the child's health. Strict adherence to the minimum legal age limit will be observed during hiring.
- b. I will not commit any act of sexual exploitation, sexual abuse or sexual violence.
- c. I will not engage in any sexual activity with any of the beneficiaries (adult or child), or with any persons under the age of 18 years, regardless of the age of majority or consent locally.
- d. I will not exchange money, employment, goods or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour. This prohibition extends to any use of sex trade workers.
- e. I will not produce, procure, distribute or use pornographic material within FSD Kenya's offices or using the organization's equipment. This includes accessing pornographic websites or sending pornographic emails.

5. Protection of Finances and Property

FSD Kenya is committed to responsible stewardship of our finances, physical property, workplaces and Information Technology resources.

As an FSD Kenya employee:

- a. I will handle FSD Kenya's financial and material resources with the utmost care.
- b. I will respect all corporate trademarks, copyright and other property (information, reports etc.) and use them only to complete their job duties.
- c. I will not use FSD Kenya property or knowledge gained from functions with FSD Kenya for private gain, financial or otherwise, or for the private gain of any third party, including family, friends or those they favor.
- d. I will appropriately account for all FSD Kenya money and property, e.g. vehicles, office equipment, IT assets.

6. Integrity

FSD Kenya does not tolerate corruption or bribery in any form. Soliciting, accepting, offering, promising or making other improper payments, including facilitation payments, is strictly prohibited.

As an FSD Kenya employee:

- a. I will perform my work with honesty and diligence, free from favoritism, nepotism, cronyism, or bribery.
- b. I will reject monetary gifts or inappropriate gifts from government functions, beneficiaries, donors, suppliers and other persons which have been offered to me as a result of my employment with FSD Kenya.
- c. I will act against any form of corruption and not offer, promise, give or accept bribes.

7. Conflict of interest

FSD Kenya is committed to identifying and addressing real and potential conflicts of interests that may arise in the course of carrying out its activities.

As an FSD Kenya employee:

- f. I will declare any financial, personal, family interest in matters of official business which may impact on the work of FSD Kenya.

8. Personal and professional conduct

All employees must fulfill their job duties with integrity and respect toward clients, stakeholders and the community.

As an FSD Kenya employee:

- a. I will not to abuse the power and influence that I have under my position over the lives and well-being of partners, colleagues, and beneficiaries.
- b. I will uphold the highest standards of competence, efficiency and integrity in my professional life. I will demonstrate truthfulness, dedication and honesty in my actions.
- c. I will follow my supervisor's instructions and complete tasks assigned to me promptly.
- d. I will foster a culture of open communication and supervise the work of others effectively, providing feedback that will enhance the skills of my colleagues.
- e. I will be patient, respectful and courteous to all persons with whom I interact with, including partners, colleagues, and beneficiaries.
- f. I will always report punctually to work.

9. Confidentiality and data protection

FSD Kenya respects the privacy and confidentiality of information relating or belonging to its clients, partners, staff and others. FSD Kenya protects personal and other confidential information in all forms.

As an FSD Kenya employee:

- a. I will be prudent in the use and protection of information in the course of my duties.
- b. I will protect personal data and confidential information against unauthorized and unlawful use, disclosure, access, loss, alteration, damage and destruction.
- c. I will seek appropriate authorization before issuing out any public statements or appear in the media regarding questions or issues in relation to FSD Kenya.

10. Health and Safety

FSD Kenya is committed to providing a healthy and safe working environment in line with applicable Occupational Safety and Health Administration (OSHA) standards.

As an FSD Kenya employee:

- a. I will ensure my safety and health and that of others.

- b. I will comply with safety and health procedures, requirements and instructions issued by FSD Kenya.
- c. I will promptly report any situation or incidence, which potentially presents a hazard.

11. Environment

FSD Kenya is committed to preventing harm to the environment and minimizes environmental damage.

As an FSD Kenya employee:

- a. I will comply with relevant national environmental legislation and discharge permits.
- b. I will work to achieve energy efficiency and minimize harmful discharge, emissions, and waste production.

12. Social Media

FSD Kenya encourages its employees to be active on social media and participate in online conversations. However, the use of social media presents certain risks and opportunities.

As an FSD Kenya employee:

- a. I will always be aware of the impact of my actions on my image and ultimately FSD Kenya's image.
- b. I will always exercise good judgement in posting material on social media.
- c. I will refer inquiries found on social media networks relating to FSD Kenya on to appropriate authority.

Referenced Documents

- a. Human Resource Staff Handbook
- b. Whistleblowing policy
- c. Anti-harassment and abuse policy
- d. Anti-Fraud and Anti-Corruption Policy
- e. Disciplinary & Grievance Policy
- f. Safeguarding and Prevention of Sexual Abuse Policy
- g. Security Policy

Acknowledgement

I _____ SEETA VISHAL SHAH _____
confirm that I have read and understood this Employee Code of Conduct, and I agree by its terms, which form part of the conditions of my employment.

