

DAID Code of Conduct

1. Introduction

1.1 Purpose:

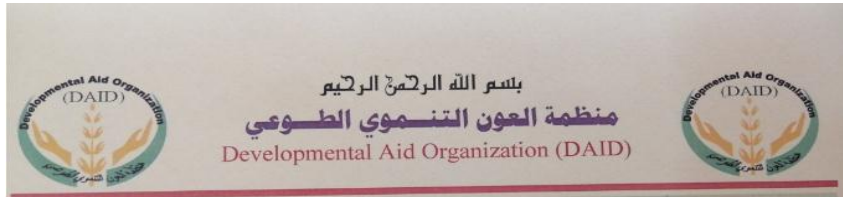
As a humanitarian services providers we are in the work of trust. We enable needed people to relief and we help people to achieve their dreams and ambitions. Our success relies on the confidence our stakeholders have in us, and every one of us has a critical role in building and maintaining this trust, we want to do what is right, not just what is allowed. When we do the right things, and behave in the right way, our stakeholders will trust and value us. In return, we can all take pride in the Organization we work for. This Code of Conduct (the “Code”) describes the way we aspire to work within DAID and guides us in our work relationships with others. It contains our Purpose and Values and sets the standards for how we should behave and how we should make decisions. The Code helps us to build long term relationships with our communities, authorities, humanitarian partners, colleagues and other stakeholders. The Code does not address all situations that may arise. It sets out general principles, rather than a complete set of detailed rules that cover all situations. When we are unsure of what to do and how to act, it is our duty to look for guidance. These Guidance can be found in other internal rules, for instance in The Board of Directors, Executive Manager’s Instructions, Guidelines or Local Governance Rules. Should any question arise to the interpretation of a particular principle or situation, seek help and advice from a manager or a relevant specialist.

1.2 Basis of the Code

The Code is based on the relevant legal requirements and internationally on Environment and Development. Agreed upon standards, primarily the ten principles of the United Nations’ Global Compact that spring from international agreements: the UN’s Universal Declaration of Human Rights, the International Labor Organization’s Conventions, the UN Convention against Corruption and the Rio Declaration

1.3 Scope

All people working for DAID, whether permanent or temporary employed, subcontracted or volunteering, are subject to the Code, including the Board of Directors. The Code applies to all



areas in which DAID operates and to all staff working on behalf of the organization within those areas.

1.4. Managerial responsibility

It is the responsibility of each manager to ensure that the Code is known and conformed to by all employees within his/her respective area of responsibility and to act in a manner that sets a proper example.

2. Our Purpose and Values

Together with the Code, our Purpose and Values set the aspiration for who we want to be: always being purpose-led and values-guided, having a strong ethical mindset and listening to our partners and other stakeholders. When we make decisions, we not only ask ourselves “Can we do it?” but also “Should we do it?” The Code should always be read and understood in the context of our Purpose and Values – they underpin the wider application of the Code in practice and should help guide personal behavior.

Purpose:

Together we lead the way enabling dreams and everyday aspirations for a greater good.

Values:

- Collaboration – for the common good
- Ownership – it starts with me
- Passion – to serve our beneficiaries
- Courage – to do what is right.

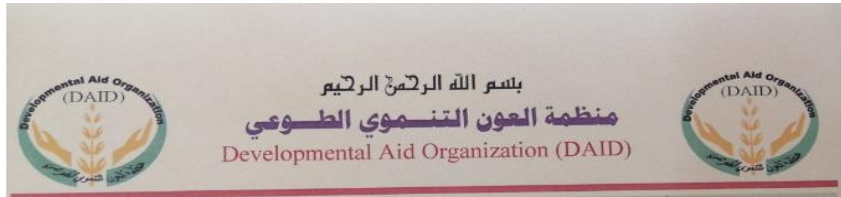
3. Our Code:

How we behave and how we do business:

3.1 We take ownership for acting professionally and with integrity

- We conduct our business responsibly and honestly.
- We keep our promises and deliver on time.
- We manage risks prudently.
- We ask questions and seek guidance if we have concerns or doubts about what is the right thing to do.

3.2 We comply with laws, regulation, industry standards and internal rules:



- We are familiar with and follow the rules, requirements and processes that apply to our specific roles, responsibilities and function.
- We recognize and strive to comply with not only the letter of the law but also with the spirit of the law.
- We do not commit or induce anyone to commit illegal activities, for example financial misreporting and misconduct or economic and financial crime.
- We are alert to illegal activities by knowing our customers.
- We take reasonable actions to verify compliance before we make decisions. In any doubts we seek guidance and advice prior to making the decisions.

3.3 We consider the impact of our decisions on all our stakeholders

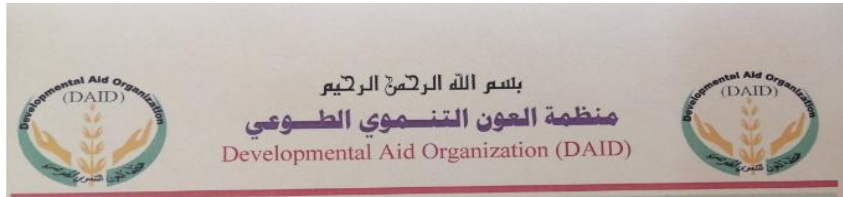
- We care for how our decisions, directly and indirectly, affect our partners, colleagues and society at large.
- We are conscious of our role to support the peace stability and long-term sustainable growth of the societies in which we operate.

3.4 We are passionate about treating our community fairly:

- Our projects and services are designed to meet the needs of identified Individuals and groups which are targeted accordingly.
- We provide clear, fair and not misleading information to our beneficiaries.
- Our advice is suitable and takes account of the community's' needs and circumstances.
- We encourage feedback from our beneficiaries and identify and handle complaints in a timely, fair and consistent manner.
- We pay particular attention to safeguarding the interests of vulnerable groups.

3.5 We avoid or manage conflicts of interest

- We are conscious that conflicts of interest can arise in all aspects of our work.
- We actively identify situations where conflicts of interest might occur and do our utmost to prevent them.
- If a conflict of interest situation has occurred or seems likely to occur, we know which actions to take and handle it accordingly.



- We do not participate in transactions if a personal interest or a close relation with a third party may influence the outcome of the transaction or our decision making in general.
- We do not engage in external activities, regardless if it is in the role as employee, private individual or any other role, that give rise to a conflict of interest that might compromise our ability to perform our role at DAID and performance, based on bias or personal preference.
- We reject all forms of discrimination, e.g. based on (dis)ability, ethnicity, religion, parenthood, age, unionization, sexual orientation, gender, gender identity or expression.

3.6 We communicate clearly and truthfully:

- We are open and proactive in our communication, without revealing sensitive information which may harm humanity relations, our competitive position or be in breach of the legislation.
- We do not deliberately mislead or deceive others by misrepresentations or partial truths.
- We are all brand ambassadors that represent our organization and we understand the impact our individual actions, in real life and online, have on the organization's reputation.

3.7 We collaborate and treat each other with respect and dignity

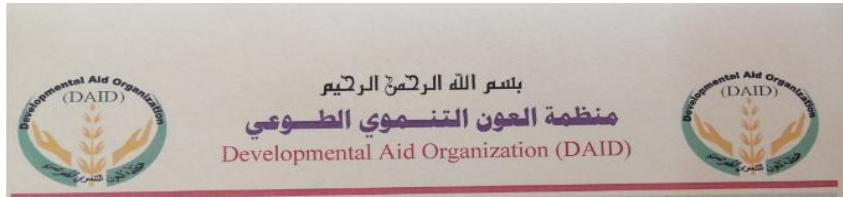
- We listen to and value input from others, both within and outside DAID, also when they express views which may differ from ours, and we understand how different views enrich our solutions.
- We reach out and help each other and understand the value of teaming up to create the best results for our beneficiaries.
- We recognize and celebrate colleagues' contributions, achieved through desired behaviors.
- We have a proper tone of voice and respect each other's boundaries and integrity.

3.8 We promote and value equality and diversity:

- We know that diversity of people contributes to a more effective and sustainable business for DAID. We make better decisions by getting a broader perspective on our challenges.
- We offer a workplace in which differences are both respected and appreciated and where all our people feel included.
- We employ, assess, promote and compensate based on competencies.

3.9 We are qualified and competent

- We ensure that we have the right competencies to deliver in our roles.



- We take ownership for our own continuous development through formal and informal learning and complete the mandatory trainings.
- We support and coach colleagues in their development and provide timely and constructive feedback on their behavior and performance.
- We share relevant knowledge and experience both within our team and across the organization.
- We set clear expectations to our leaders via our Leadership Principles and hold our leaders accountable for incorporating them into everyday business.

3.10 We ensure a safe and healthy workplace:

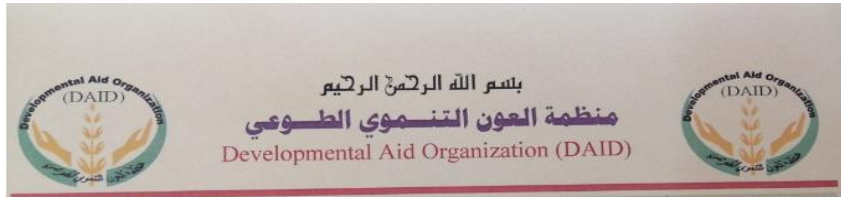
- As an organization, we seek to provide a safe, healthy and attractive environment that nurtures people's wellbeing leading to successful works results.
- We take precautions to prevent workplace accidents or injuries, by understanding the risks in our daily work environment.
- We take responsibility for our own safety, health and wellbeing and for contributing to a sound balance between work and leisure time in order to sustain healthy high performance.
- We all contribute to a positive and stimulating work environment and do not tolerate any form of harassment, bullying or similar violations.

3.11 We support and respect human rights:

- We respect fundamental and internationally recognized human rights in all areas of operation and have a responsibility to ensure our business activities do not negatively impact human rights.
- We take action to remedy adverse human rights impacts involving the Group and to minimize the risk that we are encountering in human rights abuses.
- We are committed to take voluntary action in order to support the protection and fulfillment of human rights, paying special attention to the rights of vulnerable groups.

3.12 We uphold labor rights

- We pay our employees a fair living wage and respect the upper limits on regular and overtime hours allowed by the law.
- We ensure that our employees have contracts in place and the terms of employment and termination are provided in a language they understand.



- We respect and recognize, in accordance with the labor laws of the country, and respect freedom of association and collective bargaining and employees will be free to leave in accordance with established rules.
- We uphold the effective abolition of child labor, i.e. labor performed by children or minors under the minimum working age.
- We ensure that employees under eighteen years of age will not be engaged in hazardous or heavy work or on night shifts in our value chain.
- We do not engage forced labor, slave labor or other non-voluntary labor in our value chain.

3.13 We care for the environment

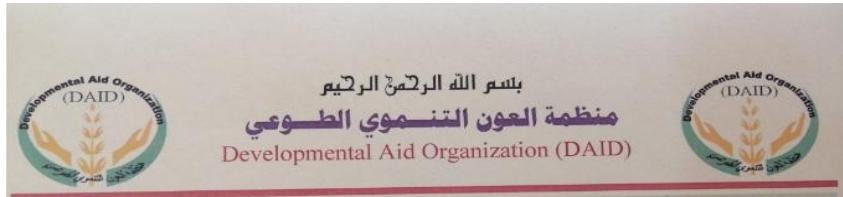
- We employ a precautionary approach to substances, processes, and activities that have an environmental impact.
- We undertake environmental risk assessments in preparation of relevant new projects and activities that involve a physical impact on the environment.
- We support and encourage the use and development of environmentally friendly technologies, and services, looking to contribute to sustainable development.
- We agree with the global consensus on the threat of climate change, and work to reduce the environmental footprint of our operations and in our value chain.

3.14 We have zero tolerance for bribery and corruption:

- We never engage in facilitation payments, trading in influence and political donations.
- We only offer or accept gifts and hospitality in accordance to strict internal rules and always with regard to avoiding conflict of interests. We only offer very limited hospitality to public officials, and only in very specific circumstances.
- We report issues that may relate to bribery or corruption.
- We do not supply, obtain or exchange information if this restricts competition.
- We will not abuse a dominant position in our operation areas.

3.15 We commit to control and manage financial crime risks:

- We protect DAID from being used to facilitate the movement of criminal proceeds like for example money laundering, funding of terrorist acts, violating sanctions regulations, fraud, tax evasion or acts of bribery and corruption.



- We manage financial crime risks in our daily activities across the Group consistent with DAID's risk appetite and compliance culture.
- We know our beneficiaries and other parties, enabling us to manage the financial crime risk in our personal and digital relationships.

3.16 We compete fairly

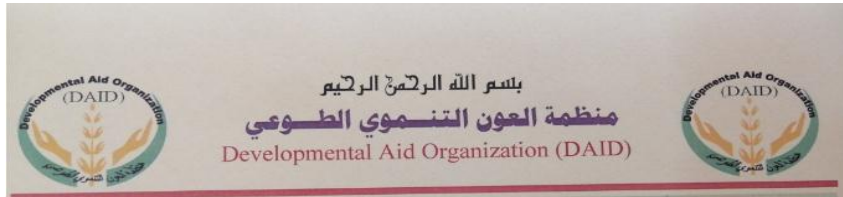
- We do not agree or cooperate with competitors, Suppliers or others so that competition is restricted. Suspicious orders and transactions as required locally.
- We will not communicate inside information to others unless such communication is part of the normal work task, position or function and purely on a need-to-know basis.

3.17 We strive to ensure humanitarian abuse does not take place:

- We take accountability for operating with integrity in our domain.
- We seek to prevent and will take proactive actions to address behaviors that might result in humanitarian misconduct.
- We are aware of which types of information that could be considered inside information and recognize when an assessment is required.
- We do not commit or induce anyone to commit to insider dealing manipulation, including on our personal accounts. We detect and report on.

3.18 We respect the right to privacy

- We keep our stakeholders' right to privacy in focus.
- We collect and process personal data fairly, lawfully and transparently for legitimate work purposes.
- We respect individuals' right to be in control of what data they share with us and for what purposes with the limitations that legal requirements set on us.
- We only disclose personal data to those authorized to receive it internally and externally, e.g. third parties we collaborate with.
- Our commitment to privacy remains also after relationships with stakeholders have been discontinued.



3.19 We protect DAID's assets

- We protect our material and immaterial assets, for example people, premises, brand and information.
- We only use DAID's assets for legitimate work purposes.
- Secure handling of information includes that we protect it against unauthorized, accidental or malicious disclosure, modification, or destruction and that we maintain confidentiality, integrity and availability of it according to its classification, regardless of whether technical means are used or not.

3.20 We have the courage to speak up:

- We all have the right and responsibility to speak up. If we see or suspect that something is illegal or unethical, we voice our concerns and report our observations.
- When we speak up, we do it in good faith.
- We have the courage to ask questions, challenge established truths and we engage in open conversations with our managers on works and conduct concerns.
- We do not intimidate and retaliate against any colleague or others who raise a concern in good faith or against those who assists with inquiries or investigation of such violations.

4. The Code in Practice:

4.1 Violation of the Code

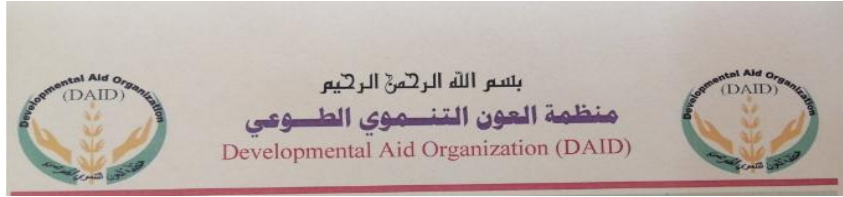
In DAID we live by our values and our Code. Appropriate actions are taken against employees who violate the Code, other internal rules, laws or regulation. Breaches may result in for instance reprimands and warnings, and in severe cases dismissal. Suspicion of crime is reported to the police. **Concerns can be raised in the following**

Three ways:

A-Openly: The employee does not require confidentiality.

B-Confidentially: The employee gives his/her name on condition that it is not disclosed without his/her consent. This is standard practice unless anything else is agreed upon.

C-Anonymously: The employee does not reveal his/her name at all. Anonymous reporting is possible through the electronic whistle blowing tool Whistle, which enables anonymous two-way communication. It is important that concerns about possible violations of the Code are raised



promptly. Failure to raise a concern can lead to DAID being exposed to unacceptable operational and financial risks, as well as reputational risk. All concerns will be evaluated for further Investigation and handled with due care. The investigation Committee ensure that key findings are communicated to the relevant internal units, to stop and to prevent further misconduct.

4.2 Training

All employees are required to undertake annual risk and compliance training, which includes an assessment to confirm understanding of the Code, as part of renewing their license to operate. Newly hired employees are required to pass mandatory trainings, amongst others covering the Code, to obtain their license to operate.

4.3 Principle responsible functions

The Code includes many different perspectives on ethical conduct. The principles in the Code have been drafted by various functions in DAID that each are responsible for their respective sections. The principle responsible functions must ensure that the wording and content of the respective principles are correct, that appropriate internal rules are in place to support the respective principles as required, and that monitoring of the respective principles is performed where relevant. If a principle responsible function identifies that amendments are required, they must inform Group Compliance.

4.4 Monitoring and reporting:

As the owners of the Code, Group Compliance has the overall monitoring responsibility and will provide at least annual Code of Conduct reports to the Group Board. The responsibility for designing, planning and performing the monitoring activities for each principle is delegated to the principle responsible functions. Group Compliance will issue Guidelines regarding monitoring input for the annual Code of Conduct reports.

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Read and Understood:

Signature:

Date: