



**HAMNUSA**

**HAMNUSA  
ETHICS POLICIES**

**Adopted May 1, 2021**

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*Approved: Executive Director*

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*Approved: Board President*

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*Reviewed by: Senior Administrative Manager*

## Table of Contents

1.	Scope of these Policies.....	3
2.	Corruption, Fraud and Bribery Policy.....	4
2.1.	Definitions of corruption, fraud, bribery .....	4
2.2.	Zero tolerance on fraud or bribery .....	4
2.3.	Anti-bribery policy.....	4
2.4.	Anti-Fraud Language required in HAMNASA Contracts.....	5
2.5.	Conflicts of Interest.....	5
2.6.	Gifts and Entertainment .....	6
3.	Whistleblower Policy.....	8
3.1.	Reporting Responsibility.....	8
3.2.	Reporting Procedures .....	8
3.3.	Handling of Reported Violations .....	8
3.4.	No Retaliation .....	9
3.5.	Acting In Good Faith .....	9
4.	Anti-Harassment Policy .....	10
4.1.	Anti-Harassment Principles.....	10
4.2.	Definitions of Harassment.....	10
4.3.	Reporting Harassment.....	11
5.	Child Protection Policy .....	12
5.1.	Child Protection Overview.....	12
5.2.	Definitions.....	12
5.3.	Procedures and Systems .....	12
5.4.	Confidentiality .....	14
5.5.	Child Protection Pledge.....	14
5.6.	Monitoring .....	14
6.	Anti-Trafficking Policy.....	14

6.1.	Background and Purpose.....	15
6.2.	Prohibitions .....	15
6.3.	Related Policies .....	16
7.	Other HAMNASA Workplace Expectations .....	17
7.1.	Respect and Dignity .....	17
7.2.	Harm and Violence .....	17
7.3.	Non-Discrimination.....	17
7.4.	Affirmative Action .....	17
7.5.	Nepotism .....	17
7.6.	Political or Religious Activity .....	18
7.7.	Gambling and Betting .....	18
7.8.	Alcohol and Illegal Drugs .....	18
7.9.	Smoke Free Environment.....	18
Appendix 1: Corruption, Fraud and Bribery Policy Annex .....		0
1.1	Glossary .....	0
1.2	Examples of Fraud and Bribery .....	1
1.3	Examples of Appropriate and Inappropriate Circumstance for Accepting or Offering Gifts .....	1
Reference Document 1: Fraud/Bribery Zero Tolerance Declaration Form .....		3
Reference Document 2: Conflict of Interest/Code of Conduct Form .....		4
Reference Document 3: Annual Conflict of Interest Questionnaire Form.....		5
Reference Document 4: Declaration of Conflict of Interest Form.....		7
Reference Document 5: Child Protection Pledge Form.....		8

## 1. Scope of these Policies

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- 1.1. These ethics policies apply to all relevant persons of HAMNASA. Relevant persons include all staff, board members, and volunteers. Some policies also apply to HAMNASA contractors and partners and will be included in 3rd party agreements, as appropriate.
- 1.2. HAMNASA requires board members, volunteers, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Employees and representatives of the organization must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

## 2. Corruption, Fraud and Bribery Policy

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### 2.1. Definitions of corruption, fraud, bribery

- A. **Corruption:** The abuse of entrusted power for private gain.
- B. **Fraud:** The act of intentionally deceiving someone in order to gain an unfair or illegal advantage (financial, political or otherwise).
- C. **Bribery:** The unlawful act of offering or receiving any gift, loan, fee, reward or other advantage (taxes, services, donations etc.) to or from any person as an inducement to do something which is dishonest, illegal or a breach of trust, in the conduct of one's duties.
- D. Additional definitions of terms related to corruption, fraud and bribery are found in Appendix 1.1.
- E. It is also bribery to make unofficial payments (known as 'grease' or 'facilitation' payments) to a public or private official to secure or speed up a routine action to which you are entitled – for example, you pay a consulate office worker an informal "fee" to speed up the issuing of your visa.
- F. Some examples of fraud and bribery relevant to HAMNASASA are described in Appendix 1.2.

### 2.2. Zero tolerance on fraud or bribery

- A. HAMNASASA's position on fraud and bribery is to take a zero-tolerance approach and we are committed to pursuing this approach throughout our operational practices for the following reasons:
  - a. HAMNASASA recognizes the significant risk that fraud and bribery pose to the achievement of its aims and objectives. Any money that is lost to fraud or bribery is money that cannot be used to achieve our objectives.
  - b. Corrupt behavior also seriously damages our reputation. The eradication of fraud and bribery in the way we operate is of great importance to securing the trust and confidence of all our stakeholders.
  - c. Creating and maintaining an anti-fraud and anti-bribery culture within the organization is a baseline expectation and requirement of our donors.
- B. All members of the staff and the board are required to sign the zero-tolerance declaration form upon joining the organization. [See attached Reference Form 1]
- C. Anyone found guilty of fraud or bribery will be subject to disciplinary measures which will ordinarily include dismissal, prosecution and recovery of losses.

### 2.3. Anti-bribery policy

- A. HAMNASASA employs all legal and safe tactics to avoid and resist paying bribes to Public and Private Officials, even if it results in denials, delays, inconvenience, and increased cost to our operations.
- B. No person is authorized to pay a bribe on behalf HAMNASASA or using HAMNASASA funds.

- C. In extreme situations, only the Executive Director (in consultation with the Board, as appropriate) may authorize payment from unrestricted funds if all other options have been exhausted. In such a circumstance, HAMNASA must clearly document the circumstances and all steps taken before reaching this decision, as well as lessons learned to avoid a similar situation arising in future. The payment must be properly and transparently recorded as such in the accounting system and appropriate parties (e.g. donors) informed.
- D. Individuals are not expected to resist bribery to the point of putting themselves or others at real risk of personal harm or injury. A payment under such circumstances is considered extortion rather than bribery.

#### 2.4. Anti-Fraud Language required in HAMNASA Contracts

- A. HAMNASA supplier application forms or contracts should overtly discourage any form of misconduct. The following supplier attestation clauses should be included.
  - a. We will provide quotations at best value when requested
  - b. We will not offer or pay any incentive to HAMNASA or its officers, either to win bids to supply goods or services, or as personal gifts or loans.
  - c. We will not provide quotations in return for favour or payment from HAMNASA or its officers.
- B. Sub-grantee application forms and sub-grantee agreements or contracts should include the following clauses:
  - a. The Contractor must disclose, in a timely manner to HAMNASA any credible evidence received that alleges fraud, conflict of interest, bribery, or gratuity violations potentially affecting this Contract or the Prime Contract/Agreement.
  - b. The Contractor shall not discharge, demote, or otherwise discriminate against any employee as a reprisal for the employee's disclosing such information to HAMNASA. Disclosures of credible evidence must be submitted immediately to HAMNASA's named administrative contact overseeing this agreement.
  - c. HAMNASA awards grants and contracts on a free and fair basis, without requesting or accepting any payment or favour. In the event that a contractor/partner is requested for any kind of payment or favour as a condition, or implied condition, for being awarded a grant or contract, the contractor/partner should contact HAMNASA's named administrative contact overseeing this agreement immediately.
  - d. The partner/contractor is responsible to refund any fraudulent losses.
  - e. A further consequence is termination by HAMNASA of a contract with a partner or contractor who has committed fraud.

#### 2.5. Conflicts of Interest

- A. A conflict of interest exists where a HAMNASA employee or a Board Member has an interest or relationship, which could, or could be seen to, interfere with their ability to decide an issue in the best interests of HAMNASA.

- B. The purpose of this policy is to ensure that all conflicts of interest are declared. Declared conflicts are managed to mitigate the associated risks, and to ensure that decisions and actions are documented to ensure transparency and accountability.
- C. The term Relationship shall include:
  - i. A family member such as an individual's spouse, parent, child, grandparent, grandchild, great-grandchild, sibling, and the spouse of any parent, child, grandchild, great-grandchild, and sibling.
  - ii. Romantic relationships
  - iii. Any other emotionally tied associations that could interfere with one's objectivity.
- D. Examples of conflicts of interest include (but are not limited to):
  - a. Relationships between HAMNUSA Staff or board members and any other staff member
  - b. Relationships between any staff person and their supervisor
  - c. Relationships between HAMNUSA staff or board members and anyone who has a personal or financial interest with an HAMNUSA supplier, donors, sub grantee, beneficiary, or job applicant.
- E. The existence or discovery of a conflict of interest does not constitute a breach of policy as long as it is disclosed in a timely manner.
- F. All HAMNUSA staff are required to complete an annual conflict of interest/code of conduct form. [See attached Reference Form 2]
- G. HAMNUSA Senior Management are also required to complete a conflict of interest questionnaire annually. [See attached Reference Form 3]
- H. Although only HAMNUSA Senior Management are required to complete a conflict of interest questionnaire each year, all staff are required to disclose conflicts of interest as soon as they arise or as soon as the staff member becomes aware of the conflict of interest.
- I. If a conflict arises or is discovered, it should be immediately declared using the declaration form. [See attached Reference Form 4]
- J. The steps taken to manage the conflict of interest and mitigate the risk of conflicted decision taking should be documented on the declaration form.

## 2.6. Gifts and Entertainment

- A. Gifts and entertainment should never be used or allowed to influence business decision making.
- B. When offers of gifts and entertainment are made or accepted in situations where they are not appropriate, they can look like, or may in fact be, bribes. They can expose HAMNUSA to accusations of unfairness or even break the law, and can put at risk our reputation for ethical behavior.
- C. Gifts are rarely allowed from donor funds and should be strictly limited. Gifts must:
  - a. be minimal;
  - b. not create any sense of expectation or obligation between the recipient and the giver;

- c. be explicitly approved by the donor budget, donor regulations and/or fund manager.
- D. The following gifts may never be offered or accepted, and will always be deemed inappropriate.
  - a. Cash of any amount
  - b. Any gift with a value exceeding \$50 (or equivalent in local currency)
  - c. Any gifts or loans from existing suppliers or prospective suppliers while a tender process is underway
  - d. Any gifts or loans to staff involved in supplier selection decisions (eg Procurement Officer or member of Procurement Committee)
- E. Gifts or entertainment below the limits above [Section 2.5 D] are not necessarily appropriate but must always be disclosed to one's supervisor.
- F. In some circumstances, an element of judgement is required to decide whether a gift is appropriate or not. Consult with your supervisor who will seek further guidance from the Executive Director. Refer to Appendix 1.3 for helpful examples of appropriate and inappropriate circumstances of offering or receiving gifts.
- G. If any staff member is offered an inappropriate gift, they should politely decline and inform their supervisor.
- H. In the event that declining an inappropriate gift in the moment that it is given might be culturally inappropriate or embarrassing, it should be returned within no less than a week, with appropriate documentary evidence to prove that the gift was returned.
- I. In the event that an inappropriate gift is received publicly, steps should be taken to restore the reputation of the organization, in addition to returning the gift.
- J. In the event that inappropriate gifts are received without consent (such as courier deliveries, bank or mobile money transfers), these should be declared immediately to one's supervisor. Steps should be taken to return the gift, or notify authorities if money laundering is suspected.
- K. Inappropriate gifts received by employees and subsequently declared should not be received into the organization's funds – rather they should in all cases be returned.
- L. Appropriate gifts, given to the organization as a whole, or to a particular team, must be enjoyed or shared by all relevant staff members (eg chocolates or flowers). An individual is not authorized to keep such a gift to themselves. Where an appropriate item is not easily sharable, it should be raffled using a random and transparent process.



## 3. Whistleblower Policy

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### 3.1. Reporting Responsibility

- A. This Whistleblower Policy is intended to encourage and enable HAMNUSA's employees and stakeholders to raise serious concerns internally so that HAMNUSA can address and correct inappropriate conduct and actions. It is the responsibility of all board members, HAMNUSA employees and volunteers to report concerns about violations of HAMNUSA's policies or suspected violations of law or regulations that govern HAMNUSA's operations.
- B. A genuine concern should be reported whenever there is evidence or a strong suspicion of misconduct in any of the following areas:
  - a. Fraud or bribery
  - b. Sexual misconduct
  - c. Harassment
  - d. Any illegal act
  - e. Any act that appears to contravene HAMNUSA ethics policies.
- C. As defined by this policy, a whistle blower is an individual who reports an activity that he/she considers to be illegal or dishonest to one or more of the parties specified in this Policy. Examples of illegal or dishonest activities are violations of federal, state, Project Country laws, or Donor Guidelines; billing for services not performed or for goods not delivered; and other fraudulent financial reporting.

### 3.2. Reporting Procedures

- A. If an individual has knowledge or concern of illegal or dishonest fraudulent activity, he/she should contact his/her immediate supervisor or the Executive Director to report the incident.
- B. If the individual is concerned about reporting the incident to a supervisor or Executive Director, HAMNUSA Human Resources may be contacted at any time to register a Whistleblower complaint.
- C. HAMNUSA HR can be contacted via a confidential email address at [Admin@hamnasa.org](mailto:Admin@hamnasa.org)

### 3.3. Handling of Reported Violations

- A. A whistleblower is not responsible for investigating the suspected activity or for determining fault or corrective measures; appropriate HAMNUSA management officials are charged with these responsibilities. Regardless of which HAMNUSA management official is contacted directly about a Whistleblower concern, all supervisors and managers must immediately share information about the reported complaint with HAMNUSA HR, who is responsible for investigating all Whistleblower complaints. In situations where concerns have been raised about HR itself, reports should be brought directly to the Executive Director. In situations where the issue involves the Executive Director, reports should be brought directly to the HAMNUSA Board President.

- B. HAMNASA will address concerns raised with the reporting person within 48 hours, assuming contact details have been provided.

### 3.4. No Retaliation

- A. Whistleblower protections are provided in two important areas -- confidentiality and against retaliation. Insofar as possible, the confidentiality of the whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law and to provide accused individuals their legal rights of defense.
- B. The organization will not retaliate against a whistleblower who has reported. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, or poor work assignments and threats of physical harm.
- C. Any whistleblower who believes he/she is being retaliated against should contact the HAMNASA Human Resources immediately at [Admin@hamnasa.org](mailto:Admin@hamnasa.org). This is a confidential email address.
- D. The right of a whistleblower to protection against retaliation does not include poor performance of their job duties, or immunity for any personal wrongdoing that is alleged and investigated. Disclosure of reports of concerns to individuals not involved in the investigation will be viewed as a serious disciplinary offense and may result in discipline, up to and including, termination of employment. Such conduct may also give rise to other actions, including civil lawsuits.

### 3.5. Acting in Good Faith

- A. Anyone reporting a concern must act in good faith and have reasonable grounds for believing the information disclosed indicates an improper accounting or auditing practice, or a violation of official policies and procedures.
- B. The act of making allegations that prove to be unsubstantiated, and that prove to have been made maliciously, recklessly, or with the foreknowledge that the allegations are false, will be viewed as a serious disciplinary offense and may result in disciplinary action, up to and including dismissal from the volunteer position or termination of employment. Such conduct may also give rise to other actions, including civil lawsuits.

## 4. Anti-Harassment Policy

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### 4.1. Anti-Harassment Principles

- A. It is the policy of HAMNUSA to maintain a work environment that encourages mutual respect, fosters good relations in the workplace and is free from all forms of harassment of any employee, contractor, consultant, volunteer, patient or employees of a partner organization from anyone, including management, colleagues, volunteers contractors or consultants.
- B. All forms of harassment are strictly forbidden and will not be tolerated by HAMNUSA. Consequently, HAMNUSA management is resolved to vigorously enforce this policy against harassment, including but not limited to, sexual harassment at all levels.

### 4.2. Definitions of Harassment

- A. The term “harassment” includes, but is not limited to, unwanted contact, jokes, verbal, graphic or physical behaviors related to an individual’s race, color, religion, sex, national origin, pregnancy, disability, age, military status, marital status, medical condition or sexual orientation.
- B. Sexual harassment consists of inappropriate sexual advances, requests for sexual favors or any other verbal or physical behavior of a sexual nature where:
  - a. Accepting such behavior is an explicit or implicit term or condition of employment;
  - b. Employment decisions are based upon the acceptance or refusal of such behavior,
  - c. Such behavior undermines the work performance of an individual or creates an intimidating, hostile or offensive environment.
- C. The term “harassment” can also include the conduct of employees, management, volunteers and/or consultants who verbally or physically engage in harassing behavior that can humiliate or harmfully embarrass an HAMNUSA employee.
- D. Harassment is not the same as performance management. Supervisors and managers have a responsibility and the right to give directions, evaluate performance and impose discipline on subordinates. The execution of management duties should be related to a legitimate workplace purpose and must not be done in a way that is abusive, demeaning, or hostile.
- E. Work related Harassment can occur:
  - a. In the workplace/office
  - b. At work-related events outside of office / during work related travel / work related accommodation
  - c. At any other place, including online or via text, if the situation is tied to work (vendors’ offices, partners’ offices, conferences, on-line webinars and real-time virtual training) or the communication is between HAMNUSA employees

### 4.3. Reporting Harassment

- A. Any employee who believes that he or she has been the target or victim of sexual harassment or other forms of harassment should immediately discuss it with their supervisor, the head of Human Resources, or any member of the HAMNASA Senior Management Team. It is also possible to report using the whistleblower email: [Hr@hamnsas.org](mailto:Hr@hamnsas.org)
- B. Any HAMNASA employee who has been made aware of an allegation of sexual harassment should inform their supervisor, the Head of Human Resources or any member of the HAMNASA Senior Management Team. It is also possible to report using the whistleblower email: [Admin@hamnasa.org](mailto:Admin@hamnasa.org)
- C. All HAMNASA supervisors are required to report any allegations of sexual harassment immediately. Reports should be made to their immediate supervisor, Human Resources head and/or the Executive Director. If preferred, reports of sexual or any other type of harassment can be made directly to the whistleblower email: [Admin@hamnasa.org](mailto:Admin@hamnasa.org)
- D. The Human Resources head is responsible for overseeing all investigations into allegations of sexual harassment for HAMNASA.
- E. Allegations of sexual harassment shall be kept in confidence as much as possible in light of the need for HAMNASA to conduct a responsible and thorough investigation.
- F. As stated in HAMNASA's Whistleblower policy, HAMNASA does not allow or tolerate acts of reprisals against any person who makes a harassment complaint or cooperates in an investigation into a declared or presumed case of harassment. HAMNASA policy forbids employees from hindering any internal inquiries and/or the resolutions at the end of such an inquiry.

## 5. Child Protection Policy

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### 5.1. Child Protection Overview

- A. Everyone has a basic duty of care toward children. We believe in the fundamental right of children to grow up safely and enjoy a childhood that is free from exploitation and abuse. If children are to be protected from abuse and exploitation, we must conduct ourselves with the highest levels of professionalism and integrity at all times.
- B. In achieving the HAMNUSA mission, our staff may come in contact with people under the age of 18. As such, HAMNUSA is responsible for ensuring that all those benefiting from HAMNUSA work, and in particular, more vulnerable groups such as young people and children, do not come into physical or mental harm in any way through their contact with our work.

At HAMNUSA we are committed to a set of principles that derive from the UN Convention on the Rights of a Child:

- All children have equal rights to protection from abuse and exploitation
- Everyone has a responsibility to support the care and protection of children
- HAMNUSA has a duty of care to children with whom they may be in contact as a result of our work in Project Country, and with whom their representatives work. HAMNUSA, including, directors, team members, consultants and volunteers have a responsibility to report any concerns.

In our work we ensure the following:

#### **Awareness**

HAMNUSA is committed to raising awareness amongst staff so they understand the principles, policy, reporting, and monitoring framework of the Child Protection Policy.

#### **Prevention**

To minimize the risks to children HAMNUSA is committed to including in all awareness raising programs regular discussion on preventive measures outlined in this document.

#### **Reporting**

HAMNUSA is committed to ensuring staff are clear about the reporting procedures included in this document.

#### **Responding**

HAMNUSA is committed to ensuring correct actions are taken to support and protect children in accordance with this policy.

### 5.2. Definitions

- A. Child - a person under the age of 18.
- B. Child Abuse - all forms of physical or mental violence, injury or abuse, maltreatment or exploitation, including sexual abuse.

### 5.3. Procedures and Systems

- A. If HAMNUSA staff are involved in training or service delivery where children are in attendance they must ensure that there is more than one person in the room at all times.

- B. When concerns or an allegation of abuse or neglect are raised by a child, parents, family members, caregivers, staff, volunteers or consultants it is the responsibility of HAMNUSA team members to:
- a. take seriously any concerns raised;
  - b. take positive steps to ensure the protection of children who are the subject of any concerns;
  - c. support children, team members or other adults who raise concerns or who are the subject of concerns;
  - d. act appropriately and effectively in instigating or cooperating with any subsequent process of investigation;
  - e. be guided through the child protection process by the principle of ‘best interests of the child’;
  - f. listen to and take seriously the views and wishes of children; and
  - g. work in partnership with parents/guardians/caregivers and/or other professionals to ensure the protection of children.
  - h. Any work-related photos taken by HAMNUSA staff of children will have the written permission of the child’s parent or guardian to be used in publication, media, or social media.
- C. Steps for Reporting Suspected Child Abuse If Suspected Abuser is HAMNUSA staff:
- a. Abuse must be reported directly to immediate manager. Immediate manager will then discuss with the HAMNUSA Executive Director. If the staff member’s immediate manager is undertaking the abuse, they must take their concerns directly to the HAMNUSA Executive Director.
  - b. HAMNUSA’s Executive Director will contact the relevant authorities qualified to review and investigate the case.
  - c. Suspected HAMNUSA staff member may be put on administrative leave during the investigation.
  - d. At the end of the investigation process, appropriate measures will be taken according to the advice of the authorities.
  - e. A finding of guilty by relevant authorities of any HAMNUSA staff could result in dismissal.
  - f. In cases involving an expatriate, if found guilty, their respective embassy will be advised of the findings of the investigation, to establish whether or not the alleged offender may be liable under the extradition laws.
  - g. Any intentional false accusation made against a staff member to damage her/his reputation will be subject to investigation and disciplinary action.
- D. If Suspected Abuser is Non-HAMNUSA Staff:
- a. If suspected abuse is witnessed or confided to HAMNUSA staff during the course of their work for HAMNUSA, they must report the allegations directly to immediate manager. Immediate manager will then discuss with the HAMNUSA Executive Director.

- b. The Executive Director will contact the relevant authorities qualified to review and investigate the cases and report the allegations.

#### 5.4. Confidentiality

- A. In all matters relating to this policy, it is essential to respect the need for confidentiality. This means no information offered by children and /or other individuals against any form of child abuse should be made public except to the relevant authorities to investigate the case.
- B. At all times we will ensure that the child (and their families) are kept fully informed of the process involved for managing this incident and the outcomes.
- C. Concerns, allegations or disclosure will be recorded in writing. At all times the transfer of information must be done in such a way that confidentiality is maintained.

#### 5.5. Child Protection Pledge

- A. All new HAMNASA staff employed on a permanent / part time / temporary contract and all HAMNASA volunteers will be made aware of this policy
- B. Upon hiring, all HAMNASA staff and volunteers as defined in 5.5 A will be required to sign a Child Protection Pledge. [See attached Reference Form 5]
- C. Individual donors may also require project staff to sign a separate pledge against child abuse.

#### 5.6. Monitoring

- A. Where a job requires direct access to children, the job description will contain a clause requiring the staff member to agree not to commit or be complicit with any form of child abuse and to aim to protect children from abuse throughout the course of their work.
- B. All incidents, allegations of abuse and complaints will be recorded and kept on file with HAMNASA HR.
- C. The Executive Director is responsible for monitoring all matters relating to child abuse within HAMNASA and referring cases to the relevant authorities and reporting to the HAMNASA Board, as appropriate.

## 6. Anti-Trafficking Policy

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## 6.1. Background and Purpose

- A. HAMNASA is committed to high standards of ethics and integrity in all aspects of project management, including the prohibition of actions that would support trafficking in persons and procedures to prevent such acts and report any violations.
- B. HAMNASA has developed this Anti-Trafficking Policy in accordance with the U.S. Government's zero-tolerance policy regarding trafficking in persons by government contractors and award recipients.

## 6.2. Prohibitions

HAMNASA and our partners, sub-awardees, sub-grantees, vendors, employees and other agents are prohibited from engaging in:

- A. Trafficking in persons (as defined in the Protocol to Prevent, Suppress, and Punish Trafficking in Persons, especially Women and Children, supplementing the UN Convention against Transnational Organized Crime);
- B. Procurement of a commercial sex act;
- C. Use of forced labor; and
- D. Acts that directly support or advance trafficking in persons, including but not limited to:
  - a. Destroying, concealing, confiscating, or otherwise denying an employee access to their identity or immigration documents;
  - b. Failing to provide return transportation to an employee relocated by HAMNASA to a posting outside the country in which they were recruited, unless:
    - i. Use of misleading or fraudulent practices during the recruitment of employees or offering of employment, such as failing to disclose, in a format and language accessible to the worker, basic information or making material misrepresentations during the recruitment of employees regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs (if employer or agent provided or arranged), any significant cost to be charged to the employee, and, if applicable, the hazardous nature of the work;
    - ii. exempted from the requirement to provide or pay for such return transportation by a donor award; or
    - iii. the employee is a victim of human trafficking seeking victim services or legal redress in the country of employment or a witness in a human trafficking enforcement action;
    - iv. the employee is legally permitted to remain in the country of employment and chooses to do so.
- E. Use of recruiters that do not comply with local labor laws of the country in which the recruiting takes place;
- F. Charging employee recruitment fees; and
- G. Providing or arranging housing that fails to meet housing and safety standards.



H. If required by law or contract, failure to provide an employment contract, recruitment agreement, or other required work document in writing. Such written work document shall be in a language the employee understands. If the employee must relocate to perform the work, the work document shall be provided to the employee at least five days prior to the employee relocating. The employee's work document shall include, but is not limited to, details about work description, wages, prohibition on charging recruitment fees, work location(s), living accommodations and associated costs, time off, roundtrip transportation arrangements, grievance process, and the content of applicable laws and regulations that prohibit trafficking in persons.

### 6.3. Related Policies

A. This Anti-Trafficking Policy is implemented in conjunction with the protections afforded by the HAMNUSA Whistleblower Policy which strictly prohibits retaliation against any HAMNUSA employee or stakeholder who reports prohibited trafficking-related activity or other violations of this policy, or who cooperates with any internal or government investigations of such reports.

## 7. Other HAMNOSA Workplace Expectations

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### 7.1. Respect and Dignity

- A. HAMNOSA firmly believes in respect and dignity of all people. Disrespect toward supervisors, subordinates, colleagues, and towards third parties will not be tolerated. If any employee exhibits repeated or egregious acts of disrespect towards others, then HAMNOSA reserves the right to take disciplinary action. Serious episodes of disrespectful behavior meant to demean or undermine a person's dignity may be construed by HAMNOSA as a form of harassment and appropriate legal measures may be pursued to protect the targeted employee.

### 7.2. Harm and Violence

- A. Violence or physical, sexual and psychological harassment at workplace against any employee for any reasons will not be tolerated and is subject to immediate disciplinary action, up to and including termination. HAMNOSA reserves the right to participate in or assist with legal action to protect its employees.
- B. HAMNOSA sees it as its duty to provide a safe work environment for its staff. HAMNOSA therefore reserves the right to take immediate action in cases where an act of violence is committed or serious threat of violence is made.
- C. False allegations of harassment or malpractice for any reason or retaliation against another employee for reporting harassment are equally subject to disciplinary action.

### 7.3. Non-Discrimination

- A. HAMNOSA respects the inherent worth and dignity of all people and enforces a strict policy of nondiscrimination in every aspect of the organization's operation. HAMNOSA forbids discrimination against candidates, employees, former employees, partners, clients, volunteers, researchers, trainees or representatives of any entity with which HAMNOSA conducts business on the basis of race, color, ethnicity, culture, religion, spirituality, gender, gender identity, sexual orientation, ancestry, age, marital or domestic partner status, disability, veteran status, health status or any other basis prohibited by local law.

### 7.4. Affirmative Action

- A. Care must be taken to ensure that the recruitment of staff for HAMNOSA does not result in the erosion of capacity elsewhere in the local health system
- B. HAMNOSA values staff diversity. Refer to HAMNOSA's non-discrimination policy for more information.

### 7.5. Nepotism

- A. Favoritism shown to a relative or friend constitutes nepotism. The most common situations presenting opportunities for nepotism include supervision and expenditure authorization. Therefore, the following policies shall apply:

- a. No HAMNASA employee or consultant shall be hired or supervised by a relative. Where such a related individual would normally supervise, alternate arrangements will be made. These arrangements shall be noted in the employee's personnel file.
- b. No individual may authorize advances, reimbursements, or the payment of benefits for a relative. If said individual would normally carry out these fiduciary responsibilities in the course of their regular duties, alternate arrangements will be made. This requirement may be assessed and waived by the Executive Director, on a case by case basis, when there are distant relatives working together and enforcement of this requirement would impede daily work.
- c. See HAMNASA's Conflict of Interest Policy [section 2.5] for required disclosure details.

### 7.6. Political or Religious Activity

- A. Employees cannot conduct political or religious activities in or out of the workplace as a representative of HAMNASA without formal approval. Employees cannot, on behalf of HAMNASA, affirm or support any particular political or religious view, or use the money, property, equipment or premises of HAMNASA to support any political or overtly religious activity unless pre-approved for mission-aligned purposes that do not jeopardize HAMNASA's nonprofit status.
- B. HAMNASA acknowledges that many communities recognize religious celebrations and openly express religious sentiments as a normally accepted part of their culture. This policy is not intended to prohibit HAMNASA staff from acknowledging religious holidays or celebrations with one another -- either in the office or over email -- so long as it is done in a respectful and inclusive manner that does not alienate individuals from other religions groups.

### 7.7. Gambling and Betting

- A. Employees cannot engage in any kind of gambling or betting activities while acting as a representative of HAMNASA in the workplace or any other location.

### 7.8. Alcohol and Illegal Drugs

- A. Alcohol may not be consumed during working hours regardless if the employee is on HAMNASA premises or outside. This applies even when the employee is traveling on duty, inside or outside the country. No employee may work under the influence of alcohol no matter where or when it is consumed. An employee found in possession of alcohol or under the influence of alcohol during work hours will be subject to Disciplinary Action.
- B. The use, manufacture, sale or distribution of illegal drugs or working under the influence of illegal drugs on HAMNASA premises, while carrying out HAMNASA work in any location, or while operating a HAMNASA vehicle is strictly forbidden and is subject to Disciplinary Action with serious penalties.

### 7.9. Smoke Free Environment

- A. Smoking is prohibited inside and on the premises of all HAMNASA offices world-wide.



## Appendix 1: Corruption, Fraud and Bribery Policy Annex

### 1.1 Glossary

<b>TERM</b>	<b>Definition</b>
<b>Attempted fraud or bribery</b>	An unsuccessful effort to commit fraud or bribery.
<b>Bribery</b>	The unlawful act of offering or receiving any gift, loan, fee, reward or other advantage (taxes, services, donations etc.) to or from any person as an inducement to do something which is dishonest, illegal or a breach of trust, in the conduct of one's duties.
<b>Corruption</b>	The abuse of entrusted power for private gain
<b>Embezzlement</b>	To steal money that people trust you to look after as part of your work.
<b>Entertainment</b>	Invitations to attend events with a social aspect, such as meals & conferences, as well as entertainment events such as shows or games, which are offered free of charge or at reduced rates.
<b>Error</b>	An accidental mistake, for example in a calculation or a decision
<b>Extortion</b>	Act of utilizing one's access to a position of power or knowledge, either directly or indirectly, to demand unmerited cooperation or compensation as a result of coercive threats.
<b>Fraud</b>	The act of intentionally deceiving someone in order to gain an unfair or illegal advantage (financial, political or otherwise)
<b>Gift</b>	Goods, services or cash offered to or by staff or board members, or their friends or family or associates, at free or preferential rates. Unpaid loans are considered gifts for the purposes of this policy.
<b>Money Laundering</b>	The concealment of the origins of illegally obtained money, typically by means of transfers involving foreign banks or legitimate businesses.
<b>Negligence</b>	Failure to give care or attention, especially when this causes harm or damage.
<b>Nepotism</b>	Form of favoritism based on familiar relationships whereby someone in an official position exploits his or her power or authority to provide a job or favor to a family member, even though he or she may not be qualified or deserving.
<b>Public Official</b>	Any person holding any legislative, executive, administrative or judicial office, whether he/she is appointed or elected, permanent or temporary, paid or unpaid.

<b>Robbery</b>	The crime of taking money or property illegally, often by using threats or violence.
<b>Theft</b>	The crime of stealing.

## 1.2 Examples of Fraud and Bribery

- A grant officer requires or accepts kick-backs from partners for grant awards or payment remittances
- A staff member submits fake receipts in an expense claim
- A manager requires a payment for authorising an expense claim
- A staff or board member fails to disclose a conflict of interest with a partner, supplier, or other staff member
- A staff member bribes an auditor to ignore or fail to report an audit finding
- A staff member colludes with a supplier to get a kickback on overpriced goods or services or inflate the cost or otherwise falsify a receipt.
- An accounts staff member records transactions in the accounting records they know to be false
- An accounts staff member knowingly posts entries to incorrect codes in order to conceal fraudulent payments
- An unofficial payment is made to a Government Officer to facilitate HAMNASA’s work in a particular District/Municipality
- An unofficial payment is made to the police or judiciary to facilitate the release from detention or dropping of charges against an HAMNASA employee or board member

## 1.3 Examples of Appropriate and Inappropriate Circumstance for Accepting or Offering Gifts

The following circumstances imply the giving or receiving of a gift or entertainment offer **may** be appropriate:

- The giving and receiving of the gift or entertainment is minimal and culturally appropriate
- The gift or entertainment does not constitute an attempt to apply undue influence, and does not create an undue obligation
- The gift or entertainment is given or accepted in the open rather than in secret
- The gift or entertainment is given to celebrate a recognized cultural event such as Christmas or New Year.
- The gift or entertainment is given to the organization or a group of people (department) rather than an individual
- The gift or entertainment is branded marketing materials (pens / notebooks etc)
- The value of the gift or entertainment is not excessive or abnormal in social context

- The timing of the gift or entertainment is not suspicious

The following circumstances imply the giving or receiving of the gift or entertainment may be inappropriate:

- The timing, nature or circumstances of the gift means it could be perceived as an attempt to influence a business decision
- The value of the gift is excessive in the circumstances (despite being below the limit in section 2.5 D)
- The receiver feels obligated, or the giver feels entitled
- The gift is given or received in secret

## Reference Document 1: Annual Fraud/Bribery Zero Tolerance Declaration Form

### Zero Tolerance Declaration

This form must be completed by all new employees and Board members upon joining HAMNASA and again annually:

I, \_\_\_\_\_, understand that HAMNASA has a zero tolerance policy on fraud and bribery.

I understand that **fraud** includes a wide range of dishonest behavior, including theft, making false statements, falsifying data, and using, for my own purposes and without permission, property that does not belong to me.

I understand that **bribery** includes a wide range of dishonest behavior, including accepting or paying kickbacks and making unofficial payments to public officials.

I understand that, at HAMNASA:

- Fraud and bribery are never acceptable.
- All activities that HAMNASA undertakes in furthering its mission must be done with integrity.
- Resources must be protected and maximized for the benefit of our beneficiaries.

Any employee found to have committed fraud or bribery will be subject to serious disciplinary action and/or termination of employment.

I understand that HAMNASA strongly encourages me to speak up and report any genuine concerns or suspicions of fraud or bribery, sexual misconduct, harassment or illegal acts in the workplace. I am familiar with **HAMNASA's Whistleblower Policy** and understand my reporting rights, responsibilities, and that I will be protected from retaliation.

I understand that I can report those suspicions verbally or in writing by contacting:

- My Supervisor
- My Executive Director
- Any Board Officer
- HAMNASA's Whistleblower email: [Admin@hamnasa.org](mailto:Admin@hamnasa.org)

I understand that I may report anonymously, but I am encouraged to give my name to make investigation possible.

Signed:

Name:

Date:



## Reference Document 2: Annual Conflict of Interest/Code of Conduct Form

### HAMNASA STAFF ANNUAL CODE OF CONDUCT STATEMENT

Upon hiring and again annually, each HAMNASA employee will be required to sign and understand the following *Code of Conduct*:

*"No employee, officer, or agent shall participate in the selection, contract, or administration of a contract if a real or apparent conflict of interest would be involved. Such a conflict would arise when the employee, officer, or agent, any member of her or his immediate family, her or his partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in the organization selected for a contract.*

*The officers, employees, and agents of HAMNASA shall neither solicit nor accept gratuities, favors, or anything of monetary value from contractors, or parties to sub-agreements. However, this policy does not apply to situations in which the financial interest is not substantial or the gift is an unsolicited item of under \$50.*

*HAMNASA's standards of conduct provide for disciplinary actions, up to and including termination, for violations of these standards by officers, employees, consultants, or agents of HAMNASA."*

**By signing below I attest that I have read and understand the above  
HAMNASA Code of Conduct and Conflict of Interest Statement**

Name:

Date:

Signed:

## Reference Document 3: Annual Conflict of Interest Questionnaire Form

**This Questionnaire is to be completed annually by all HAMNASA Board members and Senior Management Staff as noted in HAMNASA’s Conflict of Interest Policy.**

I understand that a conflict of interest arises if an employee or a Board Member has an interest, relationship, or friendship which could, *or could be seen to*, interfere with their ability to decide an issue in the best interests of HAMNASA. I understand that the existence of a conflict of interest does not constitute a breach of policy, so long as it is declared, so that it may be properly managed.

- ✓ Answers to this questionnaire should cover all current relationships.
- ✓ If any answers change during the year, it is the signor’s responsibility to disclose those changes before any potential conflict of interest occurs.
- ✓ A “Family Member” for purposes of this questionnaire includes an individual’s spouse, parent, child, grandparent, grandchild, great-grandchild, sibling, and the spouse of any parent, child, grandchild, great-grandchild, and sibling.
- ✓ A “Close Relationship” for the purposes of this questionnaire includes romantic relationships and/or other emotionally tied associations that could interfere with one’s objectivity.

1. Are you an owner, officer, board member or do you hold a governing role with an organization or company that conducts business or has a financial relationship with HAMNASA?

Yes       No      If yes, please describe.

2. Do you have a Family Member or Close Relationship with anyone who is an owner, officer, board member or holds a governing role with, or has a financial relationship with, an organization or company that conducts business with HAMNASA?

Yes       No      If yes, please describe.

3. Do you have a Family Member or Close Relationship with anyone who is an officer, board member, or has a financial relationship with HAMNASA?

Yes       No      If yes, please describe.

4. Have you participated, directly or indirectly, in any employment agreement, compensation relationship, or any other financial arrangement with a third-party entity doing business with

HAMNASA that has resulted or could result in personal financial benefit to you, a Family Member or someone with whom you are in a Close Relationship?

Yes     No    If yes, please describe.

5. Have you received, directly or indirectly, any salary payments, loans, or gifts of any kind or any free service, discounts, or other fees from any individual or organization engaged in any transaction with HAMNASA?

Yes     No    If yes, please describe.

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Signature \_\_\_\_\_ Date \_\_\_\_\_

Print name \_\_\_\_\_

<b>Submit completed form to HAMNASA Human Resource: <a href="mailto:Admin@hamnasa.org">Admin@hamnasa.org</a></b>
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To be completed by HAMNASA’s Board Committee or their designee:

Actions taken to mitigate risk of above declared conflict:

Name:

Sign:

Date:

## Reference Document 4: Declaration of Conflict of Interest Form

### Conflict of Interest Declaration Form

This form should be completed by any staff or board member who becomes aware of any new actual or perceived conflict of interest. It should be filed as soon as the individual becomes aware of the conflict.

Name:	
Position:	

I understand that a conflict of interest arises if an employee (or Board Member) has an interest, relationship, or friendship which could, *or could be seen to*, interfere with their ability to decide an issue in the best interests of HAMNASASA.

I understand that the existence of a conflict of interest does not constitute a breach of policy, so long as it is declared, so that it may be properly managed.

**I hereby declare the following conflict of interest:**

Name of person or organization and nature of relationship	
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**Submit completed form to HAMNASASA Human Resource:**

**Admin@hamnasa.org**

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To be completed by HAMNASASA Board Exec Committee or their designee:

Actions taken to mitigate risk of above declared conflict:

Name:

Sign:

Date:

## Reference Document 5: Child Protection Pledge Form

Completed upon hiring and again annually

HAMNASA

### Child Protection Pledge

I, \_\_\_\_\_ [insert name], acknowledge that I have read and understand HAMNASA's Child Protection Policy, and agree that in the course of my association with HAMNASA, I must:

- Treat children with respect regardless of race, color, gender, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other status
- Not use language or behavior towards children that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate
- Not engage children under the age of 18 in any form of sexual intercourse or sexual activity, including paying for sexual services or acts, and wherever possible ensure that another adult is present when working in the proximity of children
- Use any computers, mobile phones, video cameras, cameras or social media appropriately, and never exploit or harass children or access child exploitation material through any medium
- Not use physical punishment on children
- Not hire children for domestic or other labor which is inappropriate given their age or developmental stage, which interferes with their time available for education and recreational activities, or which places them at significant risk of injury
- Comply with all relevant national laws regarding child rights and protection
- Immediately report concerns or allegations of child exploitation and abuse and policy non-compliance in accordance with appropriate procedures outlined in the HAMNASA Child Protection policy
- Immediately disclose all charges, convictions and other outcomes of an offence, which occurred before or occurs during my association with HAMNASA that relate to child exploitation and abuse.

Signed: \_\_\_\_\_

Date: \_\_\_\_\_