



ARAB FOUNDATION
المؤسسة العربية
for freedoms & equality
للحريات والمساواة

ARAB FOUNDATION FOR
FREEDOMS & EQUALITY

CODE OF ETHICS

January 2020

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1. Introduction

The Code of Ethics of AFE is a set of fundamental principles, operational principles, and standards to guide our actions and management. AFE has the responsibility to be ethical, through diverse values described in this Code, to give out accurate information, and to not manipulate situations for the personal use benefit of its board and staff.

2. Basic Values

1. Vision and Purpose

As AFE, we are committed to doing what is right and honorable. We set high standards for ourselves and we aspire to meet these standards in all aspects of our lives—at work, at home, online and in service to our stakeholders.

This Code of Ethics and Professional Conduct describes the expectations that we have of ourselves and our fellow staff members. It articulates the ideals to which we aspire as well as the behaviors that are mandatory in our professional and volunteer roles.

The purpose of this Code is to instill confidence in AFE’s framework and to help an individual become a better practitioner. We do this by establishing a profession-wide understanding of appropriate behavior. We believe that the credibility and reputation of AFE is shaped by the collective conduct of individual staff members.

We believe that we can advance our mission, both individually and collectively, by embracing this Code of Ethics and Professional Conduct. We also believe that this Code will assist us in making wise decisions, particularly when faced with difficult situations where we may be asked to compromise our integrity or our values.

2. Persons to Whom the Code Applies

The Code of Ethics and Professional Conduct applies to all AFE staff members, interns, volunteers, consultants and board members.

3. Structure of the Code

The Code of Ethics and Professional Conduct is divided into sections that contain standards of conduct which are aligned with the values that were identified as most important to our association. A glossary can be found at the end of the standard. The glossary defines words and phrases used in the Code.

4. Values that Support this Code

AFE holds itself (staff, interns, consultants and volunteers...), and board members to these Values:

- Integrity: adherence to a moral, unbiased code
- Transparency: in all its endeavors, processes and actions
- Equality: to view and treat everyone in the same, unbiased manner
- Collaboration: amongst AFE staff, Regional Partners, board members and other stakeholders
- Non-discrimination: towards anyone or anything
- Respect: for both individuals and organizations
- Freedom: to work without political or financial restraint or pressure

5. Consequences and outcomes that follow a breach of the Code

There is a range of consequences for breaches of this Code depending on the nature and seriousness of the matter.

Managers have the responsibility to address alleged breaches of the Code promptly, and in a fair and reasonable manner. They need to assess the seriousness of any alleged breaches and how they should be dealt with.

Staff members, volunteers and interns should report any breach of the Code to their manager or director. If they are not comfortable reporting to their manager, they should report to a more senior staff member. Any complaint or report can be completed through AFE's Whistle Blowing mechanism Policy.

6. Mandatory Conduct

Each section of the Code of Ethics and Professional Conduct covers only standards. We strive to reach ideal standards in our conduct; therefore, the mandatory standards fit only the bare essential.

The mandatory standards establish firm requirements, and in some cases, limit or prohibit staff members' behavior.

Staff members who do not conduct themselves in accordance with these standards will be subject to disciplinary procedures before AFE's Ethics Review Committee.

The Ethics Review committee appointed committee, until revised is comprised of its board members, they are:

Jehan Bseiso , Charlotte Karam , Othman Mellouk ,Sa'ed el atshan , Yara Sallam

If a member from the Ethics committee is no longer available to perform his/her duties – the (5) existing ethics committee members each nominate one person from within the organization and it is called to a vote. Members may not vote for their nominated potential member. Majority voted nominate then becomes a member of the Ethics Review Committee. This meeting is coordinated by the leaving member.

3. Responsibility

As staff members at AFE, we require the following of ourselves and our fellow staff members:

Regulations and Legal Requirements:

- a) We inform ourselves and uphold the policies, rules, regulations and laws that govern our work, professional, and volunteer activities.
- b) ii. We are aware that there is a mechanism to report unethical or illegal conduct to appropriate management and, if necessary, to those affected by the conduct.

Ethics Complaints:

- c) We bring violations of this Code to the attention of the appropriate body for resolution.
- d) We only file ethics complaints³ when they are substantiated by facts⁴.
- e) We pursue disciplinary action against an individual who retaliates against a person raising ethics concerns.

4. Respect

As staff members at AFE, we require the following of ourselves and our fellow staff members:

- a) We negotiate in good faith.
- b) We do not exercise the power of our expertise or position to influence the decisions or actions of others in order to benefit personally at their expense.
- c) We do not act in an abusive manner toward others
- d) We respect the property rights of others.

5. Integrity

As staff members at AFE, we require the following of ourselves and our fellow partners:

Conflict of Interest Situations:

- a) We proactively and fully disclose any real or potential conflicts of interest to the appropriate stakeholders.
- b) We demonstrate transparency in our decision-making process.
- c) When we realize that we have a real or potential conflict of interest, we refrain from engaging in the decision-making process or otherwise attempting to influence outcomes, unless or until: we have made full disclosure to the affected stakeholders; we have an approved mitigation plan; and we have obtained the consent of the stakeholders to proceed.
- d) We implement an Anti-Corruption Policy (Addendum 4), in order to avoid any misuse of entrusted power for private gain.

Favoritism and Discrimination:

- a) We do not hire or fire, reward or punish, or award or deny contracts based on personal considerations, including but not limited to, favoritism, nepotism, or bribery.
- b) We do not discriminate against others based on, but not limited to, gender, race, age, religion, disability, nationality, health or sexual orientation, but we do give priority to those who have less opportunities outside of our organization
- c) We apply the rules of AFE without favoritism or prejudice

6. Transparency

As staff members at AFE, we require the following of ourselves and our fellow partners:

- a) We do not engage in or condone behavior that is designed to deceive others, including but not limited to, making misleading or false statements, stating half-truths, providing information out of context or withholding information that, if known, would render our statements as misleading or incomplete.
- b) We do not engage in dishonest behavior with the intention of personal gain or at the expense of another.
- c) We engage in conducting our activities in a transparent way, based on our stakeholders' requests. Transparency aims the lack of hidden agendas and conditions, accompanied by the availability of full information required for collaboration, cooperation, and collective decision-making.

7. *Process followed to create this Code*

The first step by the team in the development of this Code was to understand the ethical issues facing AFE and to relate them to our values. This was accomplished by a variety of mechanisms including focus group discussions involving our staff members, and some stakeholders. Additionally, the team analyzed the ethics codes of PMI (Project Management Institute) and diverse non-profit associations from various regions of the world and researched best practices in the development of ethics standards. The standards, used in this document, were deemed to represent the best practices for obtaining and adjudicating stakeholder feedback to the exposure draft. Through this document, AFE takes its commitment to ethics very seriously and we hold ourselves and our peers accountable to conduct in accordance with the provisions of this Code.

8. Glossary

Responsibility: is our duty to take ownership for the decisions we make or fail to make, the actions we take or fail to take, and the consequences that result.

Respect: is our duty to show a high regard for ourselves, others, and the resources entrusted to us. Resources entrusted to us may include people, money, reputation, the safety of others, and natural or environmental resources.

An environment of respect engenders trust, confidence, and performance excellence by fostering cooperation—an environment where diverse perspectives and views are encouraged and valued.

Integrity: is our duty to make decisions and act impartially and objectively. Our conduct must be free from competing self-interest, prejudice, and favoritism.

Transparency: Transparency is our duty to understand the truth and act in a truthful manner both in our communications and in our conduct.

Abusive Manner: Conduct that results in physical harm or creates intense feelings of fear, humiliation, manipulation, or exploitation in another person.

Conflict of Interest: A situation that arises when a practitioner of project management is faced with deciding or doing some act that will benefit the practitioner or another person or organization to which the practitioner owes a duty of loyalty and at the same time will harm another person or organization to which the practitioner owes a similar duty of loyalty. The only way staff members can resolve conflicting duties is to disclose the conflict to those affected and allow them to make the decision about how the practitioner should proceed.

Duty of Loyalty: A person's responsibility, legal or moral, to promote the best interest of an organization or other person with whom they are affiliated.

AFE.: The totality of the association, including its committees, groups, and chartered components such as chapters, colleges, and specific interest groups.

Staff Member: Any person acting on behalf of AFE (Managers, interns, consultants, volunteers)

AFE-Sponsored Activities: Activities that include a participation of an AFE member whether it is in a leadership role in the component or another type of component educational activity or event.

Partner: A person engaged in an activity that contributes to the management of a project, portfolio, or program, as part of the project management profession.

9. List of Addendums

Addendum 1: The Non-Disclosure Agreement

Addendum 2: The Whistle Blowing Policy

Addendum 3: The Ethics Complaint form

Addendum 4: The Anti-Corruption policy

Addendum 5: The Safeguarding Policy

Addendum 6: The Sexual Harassment Policy

Addendum 1: Non-Disclosure Agreement

1. *Work clauses*

(to be read and signed by the Staff)

The staff members at AFE commit themselves during and after the duration of their contracts to be aware of their rights but also of their obligations and duties towards the association and to respect the following clauses:

2. *Confidentiality clause*

The volunteer/staff undertakes not to divulge or communicate to any third party all or part of the confidential information concerning the beneficiaries, users and staff members. In the same way, s/he undertakes to maintain the utmost discretion regarding his/her/their work and the conditions of his/her appointment and not to use the information for other purposes other than those provided for in the contract of employment in connection with the performance of the last.

Work within AFE requires the utmost confidentiality, confidentiality vis-à-vis:

a. Beneficiaries or users

Staff members are required to have very sensitive information and data concerning the beneficiaries, who are usually people in difficulty, with the utmost discretion. No internal or external disclosure of the information contained in a user's record will be possible in any way or channel whatsoever.

Staff members are also required to make arrangements to ensure that the confidential data is not unintentionally and negligently disclosed by acquiring adequate reflexes; Avoiding the situation of a user aloud in front of his other colleagues or leaving trailing sensitive papers (Tool "Staff members Handbook": some good practices to respect confidentiality). This confidentiality applies even when the person concerned is another volunteer: thus the situation of a volunteer treated by certain units such as human resources, accounting or other, should never be discussed with or in the presence of other staff members. Having no latitudes on the subject.

b. The nature of the work

The volunteer/staff undertakes to observe the strictest discretion with regard to the activities of the association to which he/she/they will have access, directly or indirectly, in the course of his/her/their duties or because of his/her/their presence in the workforce. The nature of our work can hold sensitive or strategic data or information about the association; on its financial health, its practices, its challenges ...

In order to avoid the risk of seriously harming it, one must avoid at all costs to communicate them to anyone outside as it should avoid exposing issues related to AFE's work. We are never too cautious because it is difficult to assess whether an interlocutor can understand the internal functioning of the arena and thus the problem (s) being addressed

Sometimes the nature of the work also makes it necessary to avoid dealing with these questions in front of other staff members not involved in this activity.

Note 1: information that can be shared or discussed in public, are generally those that AFE has published on its website or on any other diffusion platform, soft or hard. The volunteer must try to limit him/her-self or to refer to it when a third person wishes to receive information.

c. Conditions of engagement

As each volunteer/staff member is unique, the conditions of his/her remuneration and the social benefits s/he receives are adapted to his/her case and particular needs. In order not to create a feeling of injustice and tensions due to this treatment on a case-by-case basis, the new volunteer/staff member must avoid sharing information about the conditions of his / her commitment (amount of salary, schedules, benefits...).

Note 2: Benefits common to all, and generally obtained through the AFE map, are generally disseminated and known to all. The Head of Operations is responsible for informing new staff members.

This confidentiality clause is valid for the entire period during which the volunteer/staff member works at AFE and may in some cases be extended to a period subsequent to the termination of his / her position within the association, contract.

As a result, the volunteer/staff who is aware of the confidentiality clauses is required to constantly make the non-disclosure effort as soon as s/he knows and possesses protected information and data.

In case of disclosure of information of all types, the volunteer/staff is exposed, according to the harm suffered, to the risk of a penalty that can go as far as dismissal (or prosecution if the volunteer/staff member is no longer active in AFE) If the non-observance of this clause has harmed the spirit of the association and its staff members and beneficiaries.

Each AFE position may have more restrictive confidentiality clauses, depending on the nature of the work itself. They will be communicated by the direct leaders at the appropriate time.

Addendum 2: Whistle Blowing Policy

1. Our Purpose

a. Our Goals & Commitment

The vision of Arabs for Freedoms and Equality is to build Societies where gender and sexual health and rights, as well as mental and bodily integrity are promoted, recognized and respected. To achieve our vision, it is crucial that all of our employees and partners understand, follow, and adhere to our corporate values:

- a. Integrity: adherence to a moral, unbiased code
- b. Transparency: in all its endeavors, processes and actions
- c. Equality: to view and treat everyone in the same, unbiased manner
- d. Collaboration: amongst AFE staff, Regional Partners, board members and other stakeholders
- e. Non-discrimination: towards anyone or anything
- f. Respect: for both individuals and organizations
- g. Freedom: to work without political or financial restraint or pressure

We have put guidelines and policies in place to ensure we live by these values in our day-to-day work.

Together with our values, we want to have feedback and encourage people to speak up

When they see activity or behavior that they feel is wrong or does not match our values. The goal of this policy is to provide very clear guideline to how we approach and manage this feedback. With our whistle blowing policy, we aim to ensure:

- Every employee should have the chance to speak up anonymously when they feel we are not adhering to our organizational values. They should have a place to report misconduct, every report will be heard and reacted to, and we will make improvements based on the results.
- AFE believes everyone should be able to make reports anonymously. We commit to protecting informant's identities and they only need to reveal themselves if they choose to.
- We will investigate every report of misconduct. At the end of the investigation, we will document the results and provide feedback when appropriate.

b. Our Commitment

AFE wants our employees to know they can provide information on any concerns they have, understand where they can report their concerns, know what happens after they make a report, and ensure they feel safe in providing a report; AFE also wants to let them know about their right to be anonymous as well as how we, as an organization, will ensure they are not subject to any retaliation or other abuse because they made a report.

c. What Conduct Should Be Reported

It is important that AFE outlines what behavior we want to be reported under this policy. We want to hear from you if you witness or know about any behavior that is:

- Fraudulent;
- Illegal;
- Corruption
- Dishonest;
- Unethical;
- Violates the law or any legal code;
- Is creating an unsafe environment;
- Breaches any of our company's policies;
- Discrimination;
- Harassment and/or bullying of any kind;
- Any conduct which is detrimental to AFE and could cause financial or non-financial loss;

d. Who Falls Under This Policy

The following would be considered an "eligible person" and would fall under AFE's whistle blowing policy.

- Employees (including directors, managers, officers and interns);
- Contractors, consultants, service providers, suppliers, business partners;
- Volunteers
- Former employees;

This policy applies to all AFE's departments, programs and offices. It also applies across all jurisdictions where we operate. If local legislation, regulation, or laws provide a higher level of protection than what is included in this policy, the local legislation will take precedence.

2. Process for Making A Report

a. What Options Do Employees Have For Making A Report

If an employee or eligible person would like to make a report, they have different channels available where they can do this. Detailed instructions for how to use and approach each of these channels is included in Appendix 1.

- Anonymous report submitted to complaints@afemena.org The report cannot be opened by anyone other than a member of the Ethics Review Board.
- Speak with their immediate supervisor
- Speak to the Executive Director

b. You Can Remain Anonymous

AFE respects and protects your identity if you choose to make an anonymous report. You can choose to remain anonymous while making a report, interacting with case managers during an investigation of your report, as well as after your case is closed. At any given time you can identify yourself, but this is your choice and at no point do you need to do this or will you be forced to provide your identity.

If you decide to disclose your identity, AFE will work to protect your identity and will outline and document who in the organization will know you submitted your report. AFE will also take all steps necessary (and outlined in this policy) to ensure you do not suffer any retaliation.

It is worth noting that AFE will make every endeavor possible to investigate your report, but in some cases, there are limitations of what can be achieved if the informant decides to remain anonymous.

c. What Is The Investigative Process?

It is important for AFE to be transparent with our employees and outline what is the process for us to investigate a report submitted through our whistle blowing channels. Below, we have provided the different steps a case manager or representative of our whistle blowing team will go through once a report is received until the case is closed.

- Report (anonymous or otherwise) is received by the following e-mail: complaints@afemena.org
- A case manager is assigned by ERC to assess it and confirm its receipt.

- The case manager will do an initial assessment to confirm it is a valid report and request permission to investigate.
- The case manager will begin their investigation. This can include corresponding with the informant if there is a channel to do this.
- Once the case manager has finalized their investigation and report based on the collected information and the consultation with the ERC, administration and the informant will be updated.
- At this point, the case manager will hand everything over to administration for any subsequent action to taken.

3. How Informants Are Protected

a. Anonymity after Submitting A Report

In “Process for making a report” we discussed how an eligible person can remain anonymous during the process of submitting a report. After submitting a report, the following policies around anonymity are in place to protect an informant’s identity.

- The informant has the right to remain anonymous and does not need to identify themselves at anytime during the investigation process.
- AFE uses tools and platforms that help protect an informant’s identity during and after submitting a report.
- At no time will AFE force the informant to reveal their identity.

- The informant can refuse to answer questions they feel could identify themselves.
- If the informant reveals themselves at any time, you will document who will have access to their identity. This can include the case manager, whistle blowing program owner, etc.

b. Potential Retaliation

An informant might be concerned that staff, management, or the organization might retaliate against them. In this case, AFE will protect the informant from:

- Being terminated or having their employment ceased;
- Performance management;
- Harassment on the job or workplace bullying;
- Warnings or disciplinary actions;
- Discrimination;
- Any other action that can be perceived as retaliation for making a report;

c. Considered Risk of Retaliation

In the case of “considered risk of retaliation”, the informant believes retaliation is near or imminent, and they are targeted for retaliation. In cases of considered retaliation, the informant should contact his immediate supervisor or the executive director . The immediate supervisor or executive director will take the action they feel is appropriate as well as come up with recommendations for how the situation can be resolved. Potential steps to protect the informant from a considered risk of retaliation can include:

- The informant taking leave.
- The informant being reassigned to other duties.
- The informant being reassigned to another location.

d. Already Retaliated Against

If the informant feels that they have already been retaliated against, they should escalate this immediately to the Executive director who will take the action they feel is appropriate as well as come up with recommendations for how the situation can be resolved. Potential steps to protect the informant after retaliation has occurred can include:

- The informant taking leave.
- The informant being reassigned to other duties.
- The informant being reassigned to another location.

e. How AFE Deals With Retaliation

AFE does not tolerate any attempts to retaliate against an informant who has made a report. Any employee or associated person that found retaliating will face disciplinary action, including the potential to be terminated from their roles.

f. Separation Of Issues

AFE will be able to still raise any issues related to work or performance related issues. While AFE will protect the informant from any retaliation, it is also important that they are still effective in their job. AFE can still raise any performance or contract issues with the informant as long as they are kept separate and not influenced at all from any reports that have been made.

g. Protection & Immunity For Others

Other parties that might have to bear witness or are involved in the investigation will be protected from retaliation in the same manner as the informant.

h. Legislative/Regulation Protection & Assistance

If in any jurisdictions or locales where AFE operates has whistle blowing protection laws that provide a higher level of protection than what is included in this policy, the local legislation will take precedence.

i. Sanctions

Anyone who has been found to have violated the terms of the code of Ethics is liable to any of the following sanctions:

- Verbal or written warning
- Adverse performance evaluation
- Reduction in wages
- Transfer
- Demotion
- Suspension
- Dismissal

The nature of the sanctions will depend on the gravity and extent of the violation.

Addendum 3: AFE Ethics Complaint Form:

1. Please print in ink or type the following information. If there are more than one Complainant or Respondent, attach additional pages to provide the same information as to all individuals.

A. Complainant(s) information(s) (optional):

Name:

Address:

Phone number:

E-mail:

B. Information regarding individual against whom the Complaint is filed (the “Respondent”)

Name:

Phone Number:

E-mail Address:

The Respondent is an individual who is (check all that apply):

- An AFE board member
- An AFE partner/consultant/advisor
- An AFE Staff member/Intern/Volunteer
- An AFE supplier
- Don't know/not sure

Note that AFE will only consider complaints against individuals who are in at least one of the four categories above.

2. Provide a statement of what you consider to be the essential facts involved in the alleged ethics violation; include specifically the applicable section(s) of the AFE Code of Ethics and Professional Conduct (the “Code”) you believe to have been violated; and explain why you believe such section(s) was/were violated:

Note: This should be a summary of the most important facts which the Complainant believes support the issuance of a formal ethics complaint by AFE. Each fact should be numbered or otherwise identified, and expressly related to a specific provision of the Code. Finally, note that the ERC will only consider alleged violation of the Code's mandatory standards, not its aspirational standards.

3. To the best of your knowledge, are there any other ethics complaints, regulatory complaints, or court actions that have been filed by you or anyone else that relate to the same or similar allegations contained in this Complaint form? If so, identify such complaints or other actions below. If any such actions have concluded, please describe specifically the results and attach relevant documentation.

Note: The Complainant should list any actions taken or contemplated that are directed at the same or related complaints. For example, the Complainant should identify any matters filed with state licensure or regulatory boards, courts or other judicial forums, professional organizations, and employers that relate to the issues raised in this Complaint.

4. List all persons you believe have knowledge of the matters you have asserted in this Complaint and a brief description of what each person's knowledge is regarding the alleged violation.

Note: Please provide each individual's full name, address, telephone number, and other contact information (e.g., e-mail address, to the extent known). Note that the ERC is permitted to contact any individual listed here or other individuals as part of its review of any Complaint.

5. List all of the documents attached to this Complaint form. If there are numerous attachments, please utilize an indexing format, such as by numbering documents as Attachment 1, Attachment 2, Attachment 3, etc.

Note: All documents must be listed by type (e.g., letter, e-mail, memo, certificate, etc.), date, and the name of the individual or organization that prepared it. All documents listed in this section must be submitted to the address provided in the instructions, along with this Complaint at the same time that this Complaint is submitted.

6. List all steps you have attempted to resolve the issue with the Respondent prior to the submission of this Complaint form if applicable.

7. Statement and certification.

By submitting this Ethics Complaint, I confirm that I have read the AFE’s Code of Ethics and agree to abide by the conditions and terms of these rules.

I hereby charge the identified Respondent with a violation(s) of this Code.

I understand that I and AFE are required to keep the information that has been filed confidential, and that only the Respondent might receive a complete non-redacted copy of this statement, as well as other information that has been submitted.

I acknowledge and agree that AFE may contact individuals who may be witnesses.

Further, I understand that some or all of the information submitted with regard to the ethics proceeding may be disclosed (in redacted or non- redacted form) to AFE’s staff members and others following a final determination by the ERC.

I further certify that the factual allegations made in this AFE Ethics Complaint are true and accurate to the best of my knowledge and that these ethics are made in good faith.

**Name and other identifiers are optional. Please note that administration will do everything possible to take necessary actions to resolve this issue, but be aware that there are limitations to the extent of AFE’s ability to react to this complaint if you do choose to remain anonymous.*

Signature of Complainant:

Printed Name:

Date:

Addendum 4: Anti-Corruption Policy

The target group of this anti-corruption policy is all AFE staff members. As AFE staff members, we are obligated to follow this anti-corruption policy and any breaches of this policy shall be reported through the AFE complaint mechanism. Corruption threatens good governance, sustainable development, democratic process, and fair business practices. Thus fighting corruption is building civil society and eliminating social injustice, which is in line with AFE’s vision”.

AFE must secure that the funds we manage do not end up in the wrong hands. AFE is entrusted with funds from a variety of donors and works to secure they are spent correctly and transparently. AFE holds a great responsibility to avoid corruption and secure that the funds are spent correctly toward donors, partners and beneficiaries. As staff members of AFE we are responsible for upholding and promoting the highest standards of ethical and professional conduct.

The purpose of this anti-corruption policy is to support a behavior characterized by high standards of personal and organizational integrity, both internally and with other external stakeholders (partners).

1. General

Corruption is defined as the misuse of entrusted power for private gain. Corruption is best known as bribery, fraud, embezzlement and extortion, and some of the examples will be listed in more detail below. Corruption has many faces. It may be in the form of money or of providing services in order to gain advantages such as favorable treatment, special protection, extra services, or reduced delays. It is important to realize that corruption is not exclusively a matter of money. To provide a person with a job, services or other favors, can in certain circumstances also be construed as corruption.

Personal security and safety should never be compromised to live up to this policy. As staff members we are responsible for following and abiding by the rules and regulations of national and international law. Furthermore, we have to abide by the international conventions signed by the country, in which we operate. It is the responsibility of AFE to inform partner organizations and other relevant stakeholders about this policy.

2. Anti-corruption principles

The following is a listing of the principles in AFE’s anti-corruption policy:

1. Conflicts of interest
2. Abuse of power and extortion
3. Fraud and Embezzlement
4. Bribery
5. Nepotism and favoritism
6. Gifts

a. Conflict of interest

We will avoid any inexpedient conflicts of interest – real or potential – between our personal interest and the interest of AFE. Avoiding conflicts of interest is the overall principle in fighting corruption. Conflict of interest arises from situations in which we as AFE staff members have a private interest that could influence our professional performance.

Conflicts of interest can occur quite frequently and are not necessarily corrupt. It is how they are identified and managed that is important. If conflict of interest situations are not properly identified and managed, they can endanger the integrity of AFE and can result in corruption. The staff members are expected to show good judgment and when in doubt, contact the superior.

The following principles are all in some ways examples of conflict of interests.

b. Abuse of power and extortion

We will not seek to influence any person or institution for private purpose by using our official position or offering them personal advantages. Likewise, we will not use AFE property, facilities, services and financial resources for private purposes except when permission is given. We will not use any forms of extortion as a method to gain advantages

This principle implies that you should not use your professional status for private gain. Misuse could be to gain advantages that you would not have gained otherwise. Relations to suppliers must not be used to gain reduced price on e.g. computers, cars, food, consultant support or travelling for private use. You are also not allowed to abuse your power as a manager to get personal favors or services done by staff members.

c. Fraud and Embezzlement

Fraud and embezzlement are illegal and must not be used as methods to gain personal or professional advantages or property in relation to AFE, partner organizations or any other stakeholders.

Fraud is defined as economic crime involving deceit, trickery or false pretenses, by which someone gains advantages or funds unlawfully. Embezzlement is defined as the misappropriation of property or funds legally entrusted to someone in their formal position as an agent or guardian.

Examples of fraud and embezzlement are false documentation, lying about qualifications and abusing power/knowledge to steal cash and equipment from the office, misusing funds entrusted to us.

Rules for accounting and documentation shall therefore be applied to at all times.

d. Bribery

We will not give or accept bribery in any form. Bribery is defined as the act of offering someone money, services or other valuables, in order to persuade him or her to do something in return. (Bribes are also called kickbacks, baksheesh, payola, hush money, sweetener, protection money, boodle, gratuity.)

One example is that we do not receive bribes from potential partners to make contracts with them and we do not give bribes to our partners as a way of influencing. We base our cooperation with partner organizations on mutual ownership, accountability, participation, equality, harmonization and alignment.

Bribery is illegal in all countries and harms the opportunities for fair trial and fair competition; it creates un-transparent business markets that can be hard or impossible to access.

e. Nepotism and favoritism

We will not favor friends, family or other personal relations in recruitment, procurement, aid delivery or other situations.

Nepotism is favoritism toward relatives and friends, based upon that relationship, rather than on an evaluation of ability or suitability. For instance, offering employment to a relative or friend, despite the fact that there are others who are better qualified and willing to perform the job, higher earnings, and other benefits to staff members who are relatives of management. To avoid favoritism and nepotism in procurement we follow the AFE Procurement / HR Manual.

It is important to underline that if conflicts of interests are handled, it is acceptable to hire/work with family or friends.

f. Gifts

We will not give or receive, directly or indirectly, any gift or other favor that may influence the exercise of our function, performance of duty or other ways of possibly harming AFE. Gifts are defined as but not limited to: services, travel, entertainment, material things or favors. In order to respect local traditions and conventional hospitality minor gifts are accepted.

The value of an acceptable gift varies over the countries in which AFE operates. Cash gifts are never accepted. All staff members are expected to show good judgment and when in doubt, contact the superior. A rule of thumb is that a gift should never influence your independent judgment and share the minor gifts that you accept with you colleagues.

I, (*employee name*) _____ hereby certify that I have read and understood all clauses of the code of ethics. I am committed to upholding the code's principles; I am aware that any breach of this code will result in disciplinary action.

Signature & Date:

Addendum 5: The Safeguarding Policy

1. Purpose

The purpose of this policy is to protect people, particularly children, at risk adults and beneficiaries of assistance, from any harm that may be caused due to their coming into contact with AFE. This includes harm arising from:

- The conduct of staff or personnel associated with AFE
- The design and implementation of AFE's programs and activities

The policy lays out the commitments made by AFE, and informs staff and associated personnel of their responsibilities in relation to safeguarding.

This policy does not cover:

- Sexual harassment in the workplace – this is dealt with under AFE's Sexual Harassment Policy (Addendum 6)
- Safeguarding concerns in the wider community not perpetrated by AFE or associated personnel

2. What is safeguarding?

Generally, safeguarding is a term used to denote measures to protect peoples' health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect

In our sector, we understand it to mean protecting people, including children and at risk adults, from harm that arises from coming into contact with our staff or programs.

Further definitions relating to safeguarding are provided in the glossary below.

3. Scope

- All staff contracted by AFE
- Associated personnel whilst engaged with work or visits related to AFE, including but not limited to the following: consultants; volunteers; contractors; program visitors including journalists and other community stakeholders.

4. Policy Statement

AFE believes that everyone we come into contact with, regardless of age, gender identity, disability, sexual orientation or ethnic origin has the right to be protected from all forms of harm, abuse, neglect and exploitation. AFE will not tolerate abuse and exploitation by staff or associated personnel.

This policy will address the following areas of safeguarding: child safeguarding, adult safeguarding, and protection from sexual exploitation and abuse. These key areas of safeguarding may have different policies and procedures associated with them

AFE commits to addressing safeguarding throughout its work, through the three pillars of prevention, reporting and response.

5. Prevention

a. AFE responsibilities

AFE will:

- Ensure all staff have access to, are familiar with, and know their responsibilities within this policy
- Design and undertake all its programs and activities in a way that protects people from any risk of harm that may arise from their coming into contact with AFE This includes the way in which information about individuals in our programs is gathered and communicated
- Implement stringent safeguarding procedures when recruiting, managing and deploying staff and associated personnel
- Ensure staff receive training on safeguarding at a level commensurate with their role in the organization
- Follow up on reports of safeguarding concerns promptly and according to due process

b. Staff responsibilities:

-Child safeguarding

AFE staff and associated personnel must not:

- Engage in sexual activity with anyone under the age of 18
- Sexually abuse or exploit children
- Subject a child to physical, emotional or psychological abuse, or neglect
- Engage in any commercially exploitative activities with children including child labor or trafficking

c. Adult safeguarding

AFE staff and associated personnel must not:

- Sexually abuse or exploit at risk adults
- Subject an at risk adult to physical, emotional or psychological abuse, or neglect

d. Protection from sexual exploitation and abuse

AFE staff and associated personnel must not:

- Exchange money, employment, goods or services for sexual activity. This includes any exchange of assistance that is due to beneficiaries of assistance
- Engage in any sexual relationships with beneficiaries of assistance, since they are based on inherently unequal power dynamics

Additionally, AFE staff and associated personnel are obliged to:

- Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of the Safeguarding Policy
- Report any concerns or suspicions regarding safeguarding violations by an AFE staff member or associated personnel to the appropriate staff member

e. Enabling reports

AFE will ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to staff and the communities we work with.

Any staff reporting concerns or complaints through formal whistleblowing channels (or if they request it) will be protected by AFE's Whistleblowing Policy (Addendum 2)

AFE will also accept complaints from external sources such as members of the public, partners and official bodies.

6. How to report a safeguarding concern:

Staff members who have a complaint or concern relating to safeguarding should report it immediately to their manager or director. If the staff member does not feel comfortable reporting to their manager or director (for example if they feel that the report will not be taken seriously, or if that person is implicated in the concern) they may report to any other appropriate staff member, or use Whistleblowing mechanisms as described in AFE's Whistleblowing Policy (Addendum 2).

a. Response

AFE will follow up safeguarding reports and concerns according to policy and procedure, and legal and statutory obligations

AFE will apply appropriate disciplinary measures to staff found in breach of policy.

AFE will offer support to victims of harm caused by staff or associated personnel, regardless of whether a formal internal response is carried out (such as an internal investigation). Decisions regarding support will be led by the victim.

b. Confidentiality

It is essential that confidentiality is maintained at all stages of the process when dealing with safeguarding concerns. Information relating to the concern and subsequent case management should be shared on a need to know basis only, and should be kept secure at all times.

c. Glossary of Terms

Beneficiary of Assistance

Someone who directly receives goods or services from AFE's program. Note that misuse of power can also apply to the wider community that the NGO serves, and also can include exploitation by giving the perception of being in a position of power.

Child

A person below the age of 18

Harm

Psychological, physical and any other infringement of an individual's rights

Psychological harm

Emotional or psychological abuse, including (but not limited to) humiliating and degrading treatment such as bad name calling, constant criticism, belittling, persistent shaming, solitary confinement and isolation

Protection from Sexual Exploitation and Abuse (PSEA)

The term used by the humanitarian and development community to refer to the prevention of sexual exploitation and abuse of affected populations by staff or associated personnel. The term derives from the United Nations Secretary General's Bulletin on Special Measures for Protection from Sexual Exploitation and Abuse (ST/SGB/2003/13)

Safeguarding

Generally, safeguarding means protecting peoples' health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect

In our sector, we understand it to mean protecting people, including children and at risk adults, from harm that arises from coming into contact with our staff or programs. One donor definition is as follows: Safeguarding means taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse and harassment from occurring; to protect people, especially vulnerable adults and children, from that harm; and to respond appropriately when harm does occur.

This definition draws from our values and principles and shapes our culture. It pays specific attention to preventing and responding to harm from any potential, actual or attempted abuse of power, trust, or vulnerability, especially for sexual purposes.

Safeguarding applies consistently and without exception across our programs, partners and staff. It requires proactively identifying, preventing and guarding against all risks of harm, exploitation and abuse and having mature, accountable and transparent systems for response, reporting and learning when risks materialize. Those systems must be survivor-centered and also protect those accused until proven guilty. Safeguarding puts beneficiaries and affected persons at the centre of all we do.

Sexual abuse

The term 'sexual abuse' means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

Sexual exploitation

The term 'sexual exploitation' means any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to profiting monetarily, socially or politically from the sexual exploitation of another. This definition includes human trafficking and modern slavery.

Survivor

The person who has been abused or exploited. The term 'survivor' is often used in preference to 'victim' as it implies strength, resilience and the capacity to survive, however it is the individual's choice how they wish to identify themselves.

At risk adult

Sometimes also referred to as vulnerable adult. A person who is or may be in need of care by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

Addendum 6: The Sexual Harassment Policy

*This policy is currently in the process of being approved by AFE's advisory board

1. The Policy Statement

The Arab Foundation for Freedoms and Equality (AFE) is committed to providing a safe environment for all its employees, consultants, volunteers and interns free from discrimination on any ground and free from any form of harassment at work including sexual harassment. AFE will operate a zero-tolerance policy for any form of sexual harassment and assault in the workplace, treat all incidents seriously and promptly investigate all allegations of sexual harassment. Any person found to have sexually harassed another will face disciplinary action, up to and including dismissal from employment.

All complaints of sexual harassment will be taken seriously and treated with respect and in confidence. No one will be victimized for making such a complaint.

2. Definitions:

- Sexual harassment:

Sexual harassment is an unwanted and offensive behavior of a sexual nature which violates a person's dignity and makes a person feel degraded, offended, humiliated and/or intimidated. It includes situations where a person is asked to engage directly or indirectly in sexual activity as a condition of that person's employment, as well as situations which create an environment which is hostile, intimidating or humiliating for the recipient.

Sexual harassment can involve one or more incidents and actions constituting harassment may be physical, verbal and non-verbal. AFE will ensure that all managers, employees, part-time staff, interns and external consultants know about and have ready access to the sexual harassment policy at all times and are familiar with its content.

Examples of conduct or behavior which constitute sexual harassment include, but are not limited to:

a. Physical conduct

- Unwelcome physical contact including patting, pinching, stroking, kissing, hugging, fondling, or inappropriate touching
- Physical violence, including sexual assault
- Physical contact, e.g. touching, pinching
- The use of job-related threats or rewards to solicit sexual favors

b. Verbal conduct

- Unwelcomed comments on a worker's appearance, age, private life, etc.
- Unwelcomed comments, stories and jokes of a sexual nature
- Sexual advances
- Repeated and unwanted social invitations for dates or physical intimacy
- Insults based on the sex of the worker
- Condescending or paternalistic remarks
- Sending sexually explicit messages (by phone or by email)

c. Non-verbal conduct

- Display of sexually explicit or suggestive material
- Sexually-suggestive gestures
- Whistling
- Leering

- Hostile environment:

Is defined when someone's speech or behavior makes someone feel that their work environment is hostile, unpleasant, intimidating, threatening or unsafe. Regardless of whether this behavior is directed at the individual, it nonetheless contributes to a generally hostile environment. Examples of behavior that can create a hostile work:

- Watching pornography
- Putting up offensive posters or calendars
- Workplace conversations and jokes of a sexist or sexual nature

- Workplace:

The workplace is any space where an employee carries out their work duties as part of their contractual obligations with AFE. This includes:

- On-site spaces: the office
- Off-site spaces: the field while doing research and/or conducting interviews, participating in an awareness campaign or protest on behalf of AFE.
- Online spaces: digital platforms used by employees as part of their work.
- Work-related events: Attending a conference, a dinner or any other social event on behalf of AFE or organized by AFE, training venues, travel work trips

3. Confidentiality:

AFE will treat the people involved and all information shared in sexual harassment cases with confidentiality. This means that the identities of those involved – including the person making the claim, the accused and any witnesses – will be protected. After the investigation is complete, physical records are stored in a locked cabinet accessible only to members of the investigative committee, and electronic records are encrypted and safeguarded on a hard disk to be kept in the cabinet as well.

4. Sexual assault is a criminal offense:

Sexual assault, including rape, is a serious and criminal offence. AFE support the person who experienced sexual assault if they wish to report the incident to the police. AFE will comply with any related police investigation. AFE reserves the right to suspend with or without pay any employee accused of sexual assault until the police investigation is complete or there is a court verdict.

5. Complaints procedures:

Anyone can be a victim of sexual harassment, regardless of their sex, gender or gender expression or sexual orientation and of the sex, gender or sexual orientation of the harasser. AFE recognizes that sexual harassment occurs between people of different genders as well as between people of same gender.

AFE recognizes that sexual harassment is a manifestation of power relationships and often occurs within unequal power dynamics in the workplace, for example between manager or supervisor and employee.

Anyone, including employees of AFE, interns, volunteers, external advisors, or visitors who sexually harass another will be reprimanded in accordance with this internal policy.

a. Who can make a sexual harassment complaint?

All employees, consultants, volunteers and interns have the right to report if they have been sexually harassed at work, or if they have witnessed someone else being sexually harassed at work. All reports will be taken seriously and will be dealt with sensitively and in a consistent and fair manner, respecting the rights of all parties involved. In some circumstances, it may be necessary to bring in external assistance or expertise to ensure a fair, impartial and objective investigation.

Sexual harassment can be reported using either the informal or formal procedures outlined in this policy. A disclosure about sexual harassment can be made anonymously using AFE's whistleblowing mechanism, however, a proper investigation will require the identities of all parties to be known solely by the investigation committee.

b. Who handles sexual harassment complaints?

An AFE employee who experienced or witnessed sexual harassment can make a complaint to any person with responsibility in AFE, including:

- An immediate manager
- Another manager at AFE
- Someone in the HR department
- A health and safety officer
- A trade union representative

This person, however, has a duty to refer the complaint to the committee in charge of dealing with sexual harassment cases.

AFE will nominate a person from the staff to be the designated person to deal with sexual harassment cases and will select a committee of 3 individuals from within the organization and external consultants on a yearly basis to deal with all complaints of sexual harassment in the workplace and lead investigations based on official and/or unofficial complaints. Head of Departments at AFE and Executive Director will nominate the designated person on a yearly basis to deal with sexual harassment cases at AFE. This person should be acquainted with the sexual harassment policy and has previous experience in working on sexual harassment issues and cases.

Any employee can appeal any decision made by this committee. When appealed, AFE will consult with two external consultants and one AFE employee to vote on the second decision. The decision is then taken by a majority of 2 votes. The second decision is final.

When a manager receives a sexual harassment complaint, they should directly refer it to the designated person at AFE. When the designated person receives a complaint of sexual harassment, he/she should:

- Immediately record the dates, times and facts of the incident(s)
- Ascertain the views of the victim as to what outcome he/she/they want
- Ensure that the victim understands the organization's procedures for dealing with the complaint

- Discuss and agree the next steps: either informal or formal complaint, on the understanding that choosing to resolve the matter informally does not preclude the person harassed from pursuing a formal complaint if he/she is not satisfied with the outcome
- Keep a confidential record of all discussions
- Respect the choice of the person harassed
- Ensure that the harassed person knows that they can lodge the complaint outside of the company through the relevant country/legal framework (when this is applicable)

Throughout the complaints procedure, a harassed person is entitled to be advised by a counselor. AFE will recommend an external counselor to assist people who experienced sexual harassment.

a. Informal complaints mechanism:

An informal complaint does not involve any disciplinary measures.

Step 1 – Informal sexual harassment complaint made:

- A verbal or written informal complaint is made about sexual harassment experienced at AFE.
- The complaint is made to a person with responsibility in AFE (defined above).
- Whoever receives the complaint informs the person designated to dealing with sexual harassment cases.

Step 2 – Informal complaint received:

- Designated person contacts or calls a meeting with the person making the complaint and:
 - If the complaint was verbal, designated person will make a written note of the complaint and share a copy with the person making the complaint
 - Informs them of their rights, the process going forward and answers any questions
 - Explains about confidentiality and what it means for them and the person they are accusing
 - Discusses the various methods for coming to a resolution as part of the informal process
 - Explains what support is available to them and ascertains what support they might want or need
 - Explains that if they are not satisfied with the outcome of the informal complaint then they may make a formal complaint
 - Puts the above in writing.
- Designated person contacts or calls a meeting with the person accused of sexual harassment and:
 - Informs them about the case against them
 - Informs them of their rights (including their right to respond) and the process going forward and answers any questions
 - Explains about confidentiality and what it means for them and the person who is accusing them
 - Discusses the various methods for coming to a resolution as part of the informal process
 - Explains the potential resolutions in an informal process
 - Explains AFE's policy on retaliation or victimization of anyone making a sexual harassment complaint
 - Puts the above in writing.
- A small number of senior management staff are informed about the case.

Step 3 – Resolution:

- The person accused of sexual harassment is given 1 week to respond in writing with their version of events.
- A method for coming to a resolution is agreed upon with both parties including:
 - Facilitation
 - Conciliation
 - Mediation
 - Arbitration.
- A resolution is agreed on. Resolutions will depend on the case but could include:
 - The promise to end sexually harassing behavior
 - A formal apology from the harasser
 - Transfers between teams
 - Training and sensitization for the harasser.
 - Confidentiality of all parties is safeguarded.
 - An informal complaint does NOT involve any disciplinary measures.

Step 4 – Follow-up & support

- Designated person will systematically follow up with both parties to ensure that the sexual harassment has stopped and that both parties are not being adversely affected in the aftermath.
- Designated person will conduct follow-up meetings with the line managers of parties involved in the complaint and will continue to assess the need for support
- If the person being harassed is not satisfied with the outcome of the informal complaint's procedure, they can make a formal complaint.

b. Formal complaints mechanism:

Step 1 – Formal sexual harassment complaint made

- A verbal or written formal complaint is made about sexual harassment experienced at AFE
- The complaint is made to a person with responsibility in AFE (defined above)
- Whoever receives the complaint informs designated person for sexual harassment cases at AFE.

Step 2 – Formal complaint received

- If the complaint made is about sexual assault, then designated person will report the case directly to the police (see x. Sexual Assault).
- DESIGNATED PERSON contacts or calls a meeting with the person making the complaint
 - If the complaint was verbal, DESIGNATED PERSON will make a written note of the complaint and share a copy with the person making the complaint
 - Informs them of their rights, the process going forward and answers any questions
 - Explains about confidentiality and what it means for them and the person they are accusing
 - Explains what the potential professional and legal consequences will be for the person they are accusing, if a case is found
 - Explains what support is available to them and ascertains what support they might want or need
 - Puts the above in writing.
- DESIGNATED PERSON contacts or calls a meeting with the person accused of sexual harassment and:
 - Informs them about the case against them

- Informs them of their rights (including their right to respond) and the process going forward and answers any questions
 - Explains about confidentiality and what it means for them and the person who is accusing them
 - Explains what the potential professional and legal consequences will be for them, if a case is found
 - Explains AFE's policy on retaliation or victimization of anyone making a complaint about sexual harassment
 - Puts the above in writing.
- A sexual harassment case file is opened.
 - A small number of senior management staff are informed about the case (defining who these people are is important).

Step 3 – Investigation

- Interviews are conducted with:
 - The person being sexually harassed
 - The person being accused of sexual harassment (satisfying their right to reply)
 - Any witnesses or third parties.
- Two people, including DESIGNATED PERSON, will represent AFE in any meeting or interview.
- Formal written statements are taken from
 - The person being sexually harassed
 - The person being accused of sexual harassment (satisfying their right to reply)
 - Any witnesses or third parties.
- The facts of the case are compiled, including diaries and evidence collated by the person being sexually harassed and any counter evidence from the person being accused.
- A confidential record of is kept of all information relating to the case, including all discussions and communication with all parties.
- Confidentiality of all parties is safeguarded.

Step 4 – Decision

- AFE, the designated person or the selected committee decides whether or not sexual harassment has happened, based on the facts and evidence compiled.
- AFE decides on what disciplinary measures are to be taken if any.
- A legal basis for the decision will be specified
- AFE will assess the need for legal support
- Both parties are given the opportunity to appeal within 5 days
- If no case is found, all documents relating to the case will be destroyed. However, an internal record that an investigation was carried out will be kept.

Step 5 – Feedback

- Feedback is given to the parties involved in the case while ensuring that confidentiality is safeguarded.
- Both parties are given the opportunity to appeal within 5 days
- If no case is found, all documents relating to the case will be destroyed. However, an internal record that an investigation was carried out will be kept.
- If a case is found, AFE will produce a report detailing the investigations, findings, outcomes, and disciplinary measures taken.

- AFE will detail an appropriate plan for follow-up and support, regardless of whether a case was found or not.

Step 6 – Follow-up & support

- DESIGNATED PERSON will systematically follow up with both parties to ensure that the sexual harassment has stopped and that both parties are not being adversely affected in the aftermath.
- DESIGNATED PERSON will also conduct follow-up meetings with line managers.
- DESIGNATED PERSON will continue to assess the need for support.

6. Sanctions and disciplinary measures:

Anyone who has been found to have sexually harassed another person under the terms of this policy is liable to a variety of sanctions, all mentioned in the Whistleblowing Policy (Addendum 2).

Anyone found to have sexually harassed someone at work, irrespective of their position in AFE, will face any of the following disciplinary measures:

- Verbal or written warning
- Adverse performance evaluation
- Transfer
- Demotion
- Suspension
- Dismissal.

The nature of the disciplinary measure will depend on the gravity and extent of the harassment in each case. However, these measures will be applied consistently across all sexual harassment cases. Serious cases will result in immediate dismissal of the accused. Any disciplinary measures taken will appear in the accused's employment records.

7. Retaliation and prevention of victimization:

It is important to protect your employees from being victimized for reporting sexual harassment. No employee will be victimized for reporting sexual harassment in good faith or for acting in good faith as a witness in an investigation. AFE regards retaliation as a serious violation of this policy and any incidents should be reported immediately. Any person found guilty of retaliation on a reported case of sexual harassment will be subject to disciplinary action, up to and including dismissal, in accordance with AFE's disciplinary policy and procedures.

8. False claims:

Unfortunately, false claims, whether accidental or malicious, do sometimes happen. Towing a hard line on false claims will help to prevent them from happening.

A false claim is when an employee reports an incident sexual harassment in the knowledge that the allegations are untrue. AFE will always conduct a proper investigation into claims and gathering of evidence will be fair, objective and thorough. Making a false claim is a serious offence and any employee found to be making a false sexual harassment claim will be subject to disciplinary action, in accordance with AFE's disciplinary policy and procedures.

AFE also recognizes that the absence of evidence of sexual harassment does not mean the claim is false. AFE does not practice or tolerate any form of victim blaming.

9. Support:

Sexual harassment has profound and long-lasting effects on the individual.

AFE will always seek to ascertain whether and what support an employee who has been sexually harassed, or an employee who has had a false sexual harassment claim made against them, needs or wants. AFE can provide support through the following:

- Paid/unpaid leave
- Part-time / shorter hours
- Shared workload
- Working from home
- Mentoring/counseling
- Back to work strategy/support
- Systematic follow-up.

AFE also has a directory of support services for employees who have been sexually harassed at work, which all employees can access.

10. Implementation of this policy:

AFE will ensure that this policy is widely disseminated to all relevant persons. All new employees must be trained on the content of this policy as part of their induction into the foundation.

Every year, AFE will require all employees to attend a refresher training course on the content of this policy.

It is the responsibility of every manager to ensure that all his/her employees are aware of the policy.

11. Monitoring and evaluation

AFE recognizes the importance of monitoring this sexual harassment policy and will ensure that it anonymously collects statistics and data as to how it is used and whether or not it is effective.

Supervisors, managers and those responsible for dealing with sexual harassment cases will report on compliance with this policy, including the number of incidents, how they were dealt with, and any recommendations made. This will be done on a yearly basis. As a result of this report, the foundation will evaluate the effectiveness of this policy and make any changes needed.

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