

CODE OF CONDUCT



Terre des
Hommes

Title	TdH NL Code of Conduct The Code of Conduct describes the expected behaviour of all TdH NL representatives.
Target Group	TdH NL Board members, Executive Team, staff, volunteers, consultants, trainees, partners and all other stakeholders
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This document replaces	Code of Conduct Undesirable Behaviours Integriteitscode Vrijwilligers ¹ Code of Conduct Child Safeguarding Gedragcode Social Media (2019) Code of Conduct Corruption, Bribery and Fraud Gedragcode gebruik Computer, Internet, Email (2019)
Date for review	March 2025

¹ A separate Code of Conduct has to be developed for the TdH NL volunteers who work in the Dutch shops. Until that is ready, the Integriteitscode Vrijwilligers applies for the shop volunteers.

CODE OF CONDUCT

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Introduction

Terre des Hommes Netherlands (TdH NL) is an international non-governmental organisation (INGO) committed to stopping child exploitation. It is the vision of TdH NL that children can flourish in a world free of all forms of exploitation.

TdH NL's mission is to protect children by preventing and stopping child exploitation, and by empowering children to make their voices count. The TdH NL values are: Human-centred, Bold, Responsible and Playful. TdH NL core principles as defined in the [Strategy](#) are: Children at the centre, Safety & wellbeing, Intersectionality & power awareness, Sustainability, and Meaningful & Strategic Partnerships.

TdH NL is committed to high standards of integrity, to have an open and safe culture and to promote children's rights and human rights. TdH NL expects its staff to follow the TdH NL values and core principles. TdH NL has functioning systems in place in case concerns arise from either children, staff, partners or members of the public.

The protection and safety of vulnerable children and adults is of paramount importance for TdH NL, as is creating a safe workplace for everybody. This links to the core principles of Children at the centre and Safety & wellbeing. That is why all our employees, volunteers and consultants commit to this Code of Conduct.

This Code of Conduct outlines the standards of conduct for all staff members, volunteers and consultants of TdH NL when interacting with project participants, partners, suppliers and funders, and any other stakeholder(s). TdH NL expects its representatives to carry out their activities with the utmost integrity and in accordance with this Code of Conduct and all of its related policies and procedures.

The Code of Conduct forms the basis of TdH NL's **Integrity Framework** together with the [Safeguarding Policy](#) and the [Speak Up! Manual](#). The Integrity Framework also includes the following documents:

- TdH NL Anti-Fraud Policy (2016, to be reviewed)
- TdH NL Conflict of Interest Policy (2023 to be approved)
- TdH NL Privacy Policy (2021)
- TdH NL Reporting and Investigation Procedure (under development)

2. Scope

2.1 Applicability

The TdH NL Code of Conduct applies to all contracted staff, volunteers, interns, consultants, members of the Executive Team (Board of Directors) and the Supervisory Board, and others acting on behalf of TdH NL - in this document collectively referred to as staff or employees.

All are personally and collectively responsible for upholding and promoting the highest standards of professional and ethical conduct. This responsibility goes beyond the working hours in the office or at home and are equally applicable during field visits, retreats and workshops. TdH NL staff need to be aware that they are ambassadors for TdH NL and its values. Therefore it is the responsibility of TdH NL staff to adhere to this Code of Conduct at all times.

2.2 Responsibility of Managers

TdH NL Management has a particular responsibility for upholding the standards of behaviour as described in this Code of Conduct. They are responsible for developing and supporting a safe environment for staff at the workplace, which includes setting a positive example.

Managers must not abuse their authority. TdH NL expects them to delegate duties to their team members taking into account their competences and workload. Managers at TdH NL have particular responsibilities including:

- leading by example
- promoting and role-modelling good ethical behaviour and business conduct complying with all laws and legislation
- promoting an environment where colleagues feel confident and able to raise concerns that are taken seriously and followed-up

2.3 Partners, donors and suppliers

TdH NL often works with partner organisations. Having their own staff Code of Conduct is a requirement for partners of TdH NL. The TdH NL

Code of Conduct sets a minimum standard that both parties need to discuss during the partnership development.

TdH NL acts with diligence when conducting activities and fulfilling contractual obligations to donors, particularly when managing administrative, financial and logistical matters, by ensuring that the funds being managed are used for the agreed purposes and according to principles of quality, transparency, economy, competition, integrity, cost-effectiveness, efficiency and excellence, in line with international standards.

When implementing projects and contracts, special emphasis is put on integrity and compliance with the principles of equal treatment, non-discrimination of partners and suppliers and impartial assistance to beneficiaries. TdH NL has a separate version of the Code of Conduct for suppliers (to be developed).

2.4 Breach

Any breach to this Code of Conduct by TdH staff will result in appropriate disciplinary measures, up to and including dismissal. TdH NL Staff Handbook article 3.4 describes which disciplinary measures may be imposed such as warnings, suspension and dismissal. With regards to partners, TdH NL will consider every breach seriously and will find, in communication with the respective partner, the best course of action to address the breach, up to and including the termination of the cooperation with the said partner.

2.5 Duty to Report

It is the duty of all staff to report any (suspicion of) breach of the Code of Conduct to TdH NL immediately. [The Speak Up Manual](#) describes the different ways in which a report can be made. Internal and external counsellors are available to give advice on how to report. Conscious failure to report breaches of the Code of Conduct may have severe consequences for the organisation or the children we work with. In particular, no one should fail to report in case of a suspected criminal offence. Staff members who report a suspected breach to the Code of

Conduct will not face any action against them, except in cases where a false report is made based on malicious intent. TdH NL does not tolerate retaliation against anyone who raises a concern, makes a report or cooperates in an investigation.

The following section (section 3) describes the principles of good behaviour that TdH expects its staff to adhere to. The other sections give further detail about the topics:

- Inappropriate behaviour - section 4
- (Child) Safeguarding - section 5
- Anti-Fraud & Corruption - section 6
- IT & Cyber Security - section 7
- Use of Social Media - section 8
- Alcohol and Drugs - section 9
- Privacy - section 10

Section 11 describes how to report a suspected breach to this Code of Conduct.

3. General standards of behaviour

TdH NL promotes a work environment where people show the following conduct:

Safeguarding children

Safeguarding and protecting children from exploitation and abuse is our core business. Our practice is founded on the principles of 'do no harm' and 'best interest of the child'.

Respect

We treat each other with dignity and respect. We act respectfully towards our staff, colleagues, children and communities with whom we work and anyone else we come into contact with.

Non-discrimination

We treat each other equally and we will not discriminate unfairly based on gender, age, disability, race, colour, sexual orientation, cultural or religious background, philosophy of life, political convictions or for any other reason.

Transparency

We strive for openness and transparency in our decision making and plans. However, confidentiality will be applied when necessary to safeguard the rights of our beneficiaries, partners, staff and others and to protect personal information.

Protect our means

We treat our financial and natural resources carefully. We make the best possible use of natural resources, limit any negative environmental impact and minimise the use of environmentally harmful compounds and substances.

Media wise

We use the internet and social media wisely and responsibly. When using the internet for private purposes, it should be reasonable and not harm our reputation or image, or negatively affect the IT network's performance.

Staying sober

We do not work under the influence of alcohol or drugs. The use of alcohol and drugs has a negative effect on your health and performance at work.

Context

We respect the laws and culture of the countries in which we work and we follow security protocols. For example, dressing appropriately to the local context and culture.

Speak Up

We speak up in case we see undesirable behaviour. We participate in achieving a culture of openness to enable any issues to be raised and discussed.

TdH NL commits vto these principles of good behaviour and expects its management and staff to adhere to this at all times: at the workplace during working hours as well as outside the workplace in your personal life.

² With the exception of the medically prescribed drugs, see section 9.

4. Inappropriate Behaviour

TdH NL condemns all forms of abuse, exploitation, intimidation, aggression or violence: we protect vulnerable groups and will not engage in any form of (sexual) intimidation, (sexual) exploitation and abuse, (psychological & physical) aggression and violence. Examples of undesirable behaviour (not an exhaustive list):

A. Sexual harassment

Any unwelcome conduct of a sexual nature or any other gender-based conduct that is an affront to the person's dignity, namely threats, promised benefits, coercion or pressure of any kind in order to obtain sexual favours. This includes unwanted sexual advances, requests for sexual favours or other unwanted sexual (verbal, non-verbal or physical) behaviour.

B. Sexual exploitation and abuse

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.

C. Aggression and violence

Psychological or physical harassment, threat or attack. Also verbal, non-verbal or physical intimidation.

D. Discrimination

Discrimination includes language or actions directly or indirectly intended to treat someone differently, less favourably or disparage them because of their origin; sex characteristic; age; language; social status; way of life; religious, gender, sexual orientation, philosophical or political beliefs or because of a physical, mental or psychological disability.

E. Other undesirable behaviour

Including, but not limited to gossip, bullying, insulting and deliberately ignoring or excluding / isolating people.

Any proven instances of harassment, exploitation, abuse, violence or threats thereof will be treated as gross misconduct, and as such, will result in appropriate disciplinary action being taken, up to and including dismissal and legal action. In line with the legal framework of the country where the action takes place, cases of abuse will be reported to the relevant authorities and result in the termination of the contract on serious grounds. All suspicions of sexual abuse and misconduct within the organisation or during project implementation will be investigated in accordance with our procedures. In cases where these suspicions arise in the course of project implementation with other partner organisations, TdH NL will cooperate with the partner organisations in reporting and investigating them.

TdH NL wants to provide a safe environment for its staff free from discrimination and sexual harassment. The [TdH NL Sexual Harassment in the Workplace Policy](#) describes what sexual harassment at the workplace is and gives examples of unwanted physical conduct, verbal conduct, non-verbal conduct.

5. Safeguarding

Given the specific nature of TdH NL work, we have zero tolerance for any form of sexual abuse, exploitation and/or harassment that targets children and communities we work with, our staff, our partners' employees, or any other vulnerable person, perpetrated by a member of our staff or representatives authorised to act on our behalf. Sexual exploitation or abuse by TdH NL staff constitute acts of gross misconduct.

[TdH NL Safeguarding Policy](#) describes how TdH NL works to protect children and adults in our programmes. TdH NL is committed to create and maintain an environment that prevents (sexual) exploitation, abuse and harassment of children and adults, including our staff (PSEAH). All staff have to be aware of the potential risks of causing harm in working with children and vulnerable adults. TdH NL staff have the responsibility to protect children and the duty to report abuse. TdH NL expects its staff to adhere to the following rules with regards to all project participants or stakeholders (children and/or adults):

1. Exchange of money, employment, goods or services for sex is prohibited.
2. Sexual relationships between TdH NL staff and project participants are prohibited. This also applies to TdH NL partners.
3. Sexual activity with children is prohibited. A child is a person under the age of 18, regardless of any younger age of maturity or consent that may be applied locally. Mistaken belief of the age of a child is not a defence.

As an organisation that works to fight child exploitation, TdH NL has a **specific sub-set of rules for staff conduct when working with children**. This list is not exhaustive. The paramount principle is to consider the best interest of the child. Staff will not:

- A. spend time alone with children away from others. There should always be at minimum 2 adults present at any activity, except for a social worker with a specific assignment for counselling a child that is part of an agreed plan.
- B. behave physically in a manner that is inappropriate, for example fondle, hold, hug, kiss or touch children in a culturally insensitive way, or behave sexually. Staff will not sleep in the same room or bed as the children.
- C. use corporal punishment or otherwise physically assault children.
- D. act in ways intended to shame, humiliate, belittle or degrade children or otherwise perpetrate any form of emotional abuse.
- E. unfairly discriminate against, show differential treatment to, or favour particular children.
- F. engage children in any activity that may be considered exploitative e.g. to do domestic or other labour for them which is inappropriate given their age or development, interferes with their education or places them at risk of harm.
- G. allow a child to be systematically neglected and fail to protect a child from harm.
- H. abandon their professional distance or develop physical or emotional relationships with children that they meet through their work, for instance by taking on a personal caring role such as by becoming a personal donor or godfather/mother.

6. Fraud & Corruption

The [TdH NL Anti-Fraud Policy](#) (2016) sets out a framework for the prevention, identification, investigation and resolution of allegations of financial irregularity made against its Board, management, employees and financial stakeholders of TdH NL. At TdH NL, we use our financial resources carefully. We are as diligent as possible when conducting activities and fulfilling contractual obligations to donors, particularly when managing administrative, financial and logistical matters, by ensuring that the funds being managed are used for the agreed purposes and according to principles of quality, transparency, economy, competition, integrity, cost-effectiveness, efficiency and excellence, in line with international standards.

We ensure that accounting records and documents supporting the project implementation are kept in compliance with the legal and contractual obligations in force and stored in a safe place. When implementing projects and contracts, we place special emphasis on ethics and compliance with the principles of equal treatment, non-discrimination of partners and suppliers and impartial assistance to beneficiaries. We develop and implement fair and transparent administrative, financial and logistical procedures to help prevent conflicts of interest.

We avoid relationships with partners or suppliers that are involved, even indirectly, in worst forms of child labour, exploitation or any other human rights or child rights violations. We immediately terminate contractual relationships if one of these conditions is breached. See TdH NL Private Sector Engagement Policy (currently under development) and TdH NL Conflict of Interest Policy.

TdH NL staff are expected not to use their position for personal gain and not to commit any instances of passive or active acts of fraud, theft, bribery and corruption, conflict of interest, and misuse of assets, misstatements and other irregularities. In particular, staff will not:

- engage in either active or passive corruption, bribery or fraud.
- seek to influence for private purposes any person or body by using our position in TdH NL or offering them personal advantages.
- use property, facilities, services and/or financial resources of TdH NL for private purposes.
- give, solicit or receive, directly or indirectly, any gift or other favour for ourselves or others that may influence the exercise of our function, performance or judgement.

Furthermore, we will avoid any conflict between our personal interests and the interests of TdH NL and report immediately any occurrence of such conflict in accordance with the requirements in our [Conflict of Interest Policy](#). Our conduct in our private life does not compromise our role as TdH NL employees. It is required to inform your line manager and the I&C Manager (integrity@tdh.nl) of any (potential) conflict of interest as they arise.

³ This doesn't apply to legal adoption procedures through national child protection systems.

7. IT & Cyber Security

7.1 Use of IT equipment

TdH NL IT equipment for staff to use remains TdH NL property. It should therefore be used responsibly for TdH NL purposes. Staff may only use the TdH NL laptop and network facilities to a limited extent for personal aims, considering the rules below:

- It is not allowed to make inappropriate use of TdH NL computer, internet or email, for example for unacceptable personal aims, such as gaming, shopping or gambling, blogging or visiting chatboxes.
- It is not allowed to visit websites and chat rooms with the TdH laptop that contain pornographic, racist, discriminatory or other offensive material, and/or to download or share offensive material and to visit websites with illegal content.
- It is not allowed to use the TdH NL email system to send spam, or messages with bullying, pornographic, (sexually) intimidating, racist, discriminatory, offensive (or offensive in nature) messages that (may) incite hatred or violence.

7.2 Use of email and internet

Furthermore, TdH NL expects its staff to act responsibly, professionally and ethically when using email and internet, to contribute to the safety of the IT systems, for example:

- Do not open e-mail messages, attachments and links that look suspicious. Most viruses are spread through attachments and links.
- Do not use your work email for personal purposes. Do not use your personal email for work purposes.

7.3 Privacy Breach

According to the [TdH NL Privacy policy](#), staff are to report a breach of the security of personal data to the TdH NL Privacy Officer (privacy@tdh.nl) who will investigate if it is a breach that has to be reported to the Dutch Data Protection Authority within 72 hours.

7.4 Child sexual abuse materials (CSAM)

Everyone working for TdH NL could come into contact with child sexual abuse materials (CSAM). For instance, these materials could be shared in a group or platform you are a member of. Or these materials might be sent via private message to you personally or to one of the organisation's official social media accounts. Should you receive CSAM, or suspect you have received CSAM, do not access or open these materials and do not forward them. Possessing, accessing and disseminating CSAM constitutes a criminal offence in most if not all cases. CSAM should immediately be reported to the Integrity & Compliance Unit (without sharing it) via integrity@tdh.nl.

8. Use of Social Media

For social media, the basic rule of thumb is that **every staff member is always representing TdH NL**, whether inside or outside office hours, and whether operating via official TdH NL or via personal social media channels. As a consequence, TdH NL requires the same integrity standards of staff in the digital world as what is expected within the organisation.

8.1 Posting about TdH NL, our work and project participants

As a TdH NL employee, we do consider you our brand ambassador and we encourage you to proudly share the content from TdH NL's official social media accounts regularly and consistently. This will increase our visibility, strengthen our brand and positioning. At the same time, child safeguarding is our overriding principle. All staff should refrain from collecting materials and content with children for private use from our activities, such as taking pictures and videos and posting them on your personal social media accounts.

The publication of images of children may only be for strictly professional purposes, scrutinised by our Marketing, Communications & Fundraising department. These materials may only be distributed and/or shared via our official communication channels. Any communication material that uses personal information and/or images of children and their families, must comply with the relevant basic ethical principles and follow the Safeguarding policy. This includes but is not limited to: acting in the best interest of the child; doing no harm; obtaining written consent of the child, their parents or a person responsible for the child before taking photos/testimonies; always respecting the child's dignity; guaranteeing the child's safety; and protecting their privacy. All pictures/videos that comply with TdH NL's safeguarding standards and are authorised for use, are stored in the Fileflow database. See the Safeguarding policy Annex 3 for detailed guidelines for communication about children.

8.2 Appropriate online behaviour

Appropriate social manners are important, both offline and online. We would like you to stay connected and transparent, but bear in mind the following guidelines:

- Always be aware of the impact of what you share through your personal social media. Everything you share can have consequences for TdH NL and our colleagues who work in very different cultures.
- Adhere to the same standards of behaviour online that you follow in real life. If you would not say it to someone's face, do not say it online either.
- Do not hurt or damage others through social media, and refrain from acting improperly or discredit TdH NL, its staff, partner organisations and/or the children and communities we work with.
- Do not engage in online harassment such as embarrassing, cyberbullying, humiliating or threatening others in an online setting.
- Be respectful. Never resort to slander, insults, obscenity. Share to empower or inform.
- Be careful about getting into a discussion with a donor, relation or competitor of TdH NL as it can have a negative impact on TdH NL.
- Adhere to legal and ethical standards. Do not share information and images/videos that could infringe others' privacy. Do not use materials (such as photos) from others that are copyright protected, without permission. Do not publicise other people's work without their consent. Always ask permission to repost and name the source.
- Remember that the use of social media is 'real time'. Your post is immediately online and most likely will exist forever. Think carefully about the content (message/words; non-verbal communication) and the form of your post (text, image, sound, video, etc).
- Digital communication is notoriously subject to (mis)interpretation. You could easily come across as rude, angry or sarcastic, even when that's not your intention. Be careful and re-read your post before posting to make sure the tone is not negative.

- Be aware of 'CAPS LOCK'. Writing in caps is generally frowned upon. You might want to use caps to draw attention to something, but many interpret it as being yelled at or scolded. Instead, try using *asterisks* surrounding words you want to highlight.
- Of course you can express your opinions. Create a disclaimer that highlights opinions of employees should always be associated with the employee and not the organisation. The wording can simply state "views expressed are my own" in your bio.

8.3 Sharing information on social media

- Staff may share knowledge and relevant information online, when this information is not confidential and not harmful to TdH NL.
- Staff may not share confidential or harmful information about donors, project partners, suppliers or upcoming (marketing) campaigns without prior consent.
- TdH NL supports open communication and exchange of ideas/knowledge. Staff who share information on other than TdH NL websites or social media about a topic that relates to the TdH NL's work, should indicate whether they write on behalf of TdH NL or on a personal note. If on behalf of TdH NL, indicate your function within TdH NL.
- Board members, managers and others who publicly represent TdH NL to promote its policy and strategy, have a special responsibility when they make use of social media. For some functions they will always be seen as representing TdH NL - even if they express their personal opinion.
- Staff are personally responsible for the content they publicise on blogs, wiki's and other media based on user-generated content.

9. Alcohol and Drugs

Being under the influence of alcohol or drugs can seriously impair an individual's judgement and reactions leading to an increased risk of accidents and injuries occurring. We want to ensure the safety of all TdH NL staff and third parties by having clear rules in place regarding use and possession of alcohol and drugs.

TdH NL Personnel Handbook (2022) states that during working hours and at all times whilst on work premises staff must be free from the influence of drugs or alcohol. This will help to ensure the health and safety of employees and others with whom they come into contact, and to maintain the efficient and effective operation of the organisation. For those reasons, no employee or third party will:

- perform work activities when unfit due to alcohol or drugs (whether illegal or not) or to substance abuse;
- be in possession of alcohol or illegal drugs when working;
- supply others with illegal drugs, or with alcohol;
- consume alcohol or illegal drugs or abuse any substance whilst at work.

TdH NL may take disciplinary actions assessing each case individually, such as official warning, suspension, salary deduction, dismissal and reporting to the police. In addition, possession of or dealing in illegal drugs whilst at work or on work premises, will, without exception, be reported to the police.

Only on special occasions are alcoholic drinks available at TdH NL premises or TdH NL related events. The Executive Team or Regional Directors may decide when an occasion is special e.g. in events organised by the organisation.

Please bear in mind that due to the child-focused nature of our work, events with third parties where alcohol is served should be limited. No alcohol should be served at events where children are present.

10. Privacy

TdH NL handles sensitive information, from staff, children, private donors, etc. We have to treat this information confidentially to make sure that this information can never become accessible to anyone who could misuse this information and/or harm the integrity of people, our programmes or our organisation. All information about a person that can be traced to a person is personal data. TdH NL staff are responsible for protecting the personal data entrusted to us in accordance with the TdH NL Privacy Policy that gives more details on how to keep personal data safe and comply with privacy legislation and international standards.

10.1 Permission

Before processing any personal data, valid consent is always required, for instance based on a legal requirement or an (employment) contract. Permission is in writing, clear and informed, and easy to withdraw. We are not allowed to share personal data with others without permission or a valid legal basis. If you process data from donors, volunteers, employees or beneficiaries, you provide them in advance with information on how TdH NL processes and handles their personal data. This is stated in the Privacy Statement on our website. Every data subject has the right to access a copy of the data processed about them. We must provide this in a structured, common, digitally readable form and free of charge. Every data subject has the right to rectification, erasure or restriction of processing.

10.2 Privacy principles

- Lawfulness, fairness and transparency: processing must be lawful, fair, and transparent to the data subject.
- Purpose limitation: you must process data for the legitimate purposes specified explicitly to the data subject when you collected it.
- Data minimization: you should collect and process only as much data as absolutely necessary for

the purposes specified.

- Accuracy: you must keep personal data accurate and up to date.
- Storage limitation: you may only store personally identifying data for as long as necessary for the specified purpose.
- Integrity and confidentiality: processing must be done in such a way as to ensure appropriate security, integrity, and confidentiality (e.g. by using encryption).

10.3 Privacy guidelines

- We do not share personal data with unauthorised persons.
- We do not include personal details in the e-mail and do not send the document as attachment, but share the link to the document on the secured TdH NL Google Drive.
- We store all emails containing personal data from donors, volunteers, employees, applicants or beneficiaries in the official file in the archive or data system of the donor, volunteer, employee, applicant or person involved.
- We keep documents and data in the right place.
- We clean our mailbox and My Drive and Shared Drives regularly.
- We do not send personal data or personal information by Whatsapp or other messaging services.

11. How to report?

TdH NL attaches great importance to integrity. Integrity means 'doing the right thing' at all times - regardless of whether someone is watching. TdH NL conducts business in an open, reliable and honest manner in accordance with our Code of Conduct and internal policies, as well with respective relevant laws and regulations. Nevertheless, something can go wrong within TdH NL and you may be confronted with ethical concerns or dilemmas.

TdH NL has functioning reporting mechanisms and investigation protocols in place in case concerns arise from either children, staff, partners or members of the public.

The employees of TdH NL are the eyes, ears and conscience of our organisation and will often be the first to spot possible wrongdoing at the workplace or in the projects. It is very important to TdH NL that these signals end up in the right place to be able to investigate, assess and take measures. If you observe something that worries you, we encourage you to speak up to help address the situation. Even more, you have a duty to report any (suspected) breach to our Code of Conduct.

When you suspect misconduct, discuss it first if possible with the colleague in question or your line manager. You can ask for advice with the internal and external counsellor, with HR and with TdH NL Integrity focal points (Head of Region, Country Directors or assigned staff).

Reporting a (suspected) breach to the Code of Conduct

If you want to report a concern, you can do this through your line manager or through the online TdH NL Speak Up! Portal managed by the TdH NL Integrity & Compliance team.

The [Speak Up! Portal](#) is a safe system that enables (anonymous) reporting and anonymous communication with the person who reports. Staff, partner staff, suppliers and other stakeholders are able to report any concerns regarding (suspicions of) misconduct at TdH NL at any time in any language. All communications about a report are done within the system and by identifiable users and password protected. The Integrity & Compliance team manages the intake and coordinates the response.

Please read the Speak Up! Manual for more information. TdH NL has a reporting and investigation procedure that describes the follow-up steps when you report and if and how an investigation takes place. TdH NL has provisions in place to protect the rights of the reporter as well as the rights of anyone who is a subject of the report.

An investigated breach to the Code of Conduct may lead to disciplinary measures, such a suspension or dismissal. We will involve the (local) authorities in case of criminal offences.

Definitions

Abuse - The physical, sexual, emotional, economic or psychological actions or threats of actions that influence another person. This includes any behaviours that frighten, intimidate, terrorise, manipulate, hurt, humiliate, blame, injure, or wound someone. It also includes abuse online and/or through mobile technology.

Aggression and violence - Aggression and violence refers to incidents in which a person is psychologically or physically harassed, threatened or assaulted under circumstances directly related to the performance of work.

Bullying - All forms of intimidating behaviour within the organisation with a structural character, by one or more persons directed against a person or a group of persons who cannot or do not defend themselves against this behaviour.

Child - A person below the age of 18, even if they have reached the age of majority under the law applicable to them.

Child abuse - The universal categories of child abuse (see The United Nations Convention on the Rights of the Child article 19) are defined as follows and act as a reference for local environments:

- Physical abuse: Actual or likely physical injury to any child or a failure to prevent physical injury or suffering;
- Sexual abuse: Actual or threatened sexual violence towards a child including all forms of sexual activity such as rape, incest, sexual assault, sexual harassment and child sexual abuse material;
- Emotional abuse: Persistent or severe emotional ill-treatment or rejection. All abuse involves emotional ill-treatment;
- Neglect: The failure to protect a child from exposure to any kind of danger;
- Exploitation: An individual, group or organisation taking advantage of an imbalance of power to get a child to engage in activities that are detrimental to the child's wellbeing and development, and from which the alleged perpetrator(s) and/or third party(ies) gain some advantage.

Consent - The act of giving one's free and informed consent. A child can never give consent for sexual acts.

Corruption - The abuse of entrusted power for

private gain, including bribery.

Discrimination - Discrimination includes language or actions directly or indirectly intended to treat someone differently, less favourably or disparage them because of their origin; sex characteristic; age; language; social status; way of life; religious, gender, sexual orientation, philosophical or political beliefs or because of a physical, mental or psychological disability.

Dignity - Innate right to be valued and receive ethical treatment.

Employee - The person who works for Terre des Hommes, including paid and non-paid TdH-NL workers.

Exploitation - An individual, group or organisation taking advantage of an imbalance of power to get a child or an adult to engage in activities that are detrimental to the person's wellbeing and development, and from which the alleged perpetrator(s) and/or third party(ies) gain some advantage.

Fraud - Any intentional act or omission designed to deceive others, resulting in the victim suffering a loss and/or the perpetrator achieving a gain.

Gender - Gender refers to the socially constructed roles, behaviours, expressions and identities of girls, women, boys, men, and gender diverse people. These attributes, opportunities and relationships are socially constructed and are learned through socialisation processes. They are context/ time-specific and changeable.

Harassment - Under Dutch criminal law, harassment is a way for the perpetrator to make the victim give in and achieve what they want. In such cases, the offence of coercion (Art. 181 of the Criminal Code) could be used insofar as harassment makes it possible to hinder the victim's freedom to act and obliges them to act, not act or permit an act to be committed.

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

Inappropriate - That which is not within the bounds of propriety and best practice. That which is indecent.

Misconduct - A breach of the TdH NL Code of Conduct, values, policies and internal regulations, Dutch law, local law and external regulations in

Dissemination

countries where TdH NL operates.

Online harassment - the use of information and communication technologies by an individual or group to repeatedly cause harm to another person. This may involve threats, embarrassment, or humiliation in an online setting.

Safeguarding - The responsibility of organisations to make sure their staff, operations and programmes do no harm to children and vulnerable adults, and that they do not expose them to the risk of harm and abuse.

Sexual harassment - Any form of unwanted verbal, non-verbal or physical conduct of a sexual nature with the purpose or effect of violating the dignity of a person, in particular when creating an intimidating, hostile, degrading, humiliating or offensive environment.

Sexual relations - Any act of a sexual nature, always with consent, otherwise it is abuse.

Threats - Words, statements, actions or behaviour intended to frighten or alarm a person.

Undesirable behaviour - This is an umbrella term for several forms of transgressive behaviour between persons in an organisation, such as aggression and violence, bullying, discrimination and sexual harassment.

Vulnerable person - A person seen as an easy target for potential abuse or exploitation due to their gender, race, sexual orientation, sex characteristic, age, maturity, their social and economic environment and/or their physical or mental state.

This Code of Conduct is attached to the contract of employment for all new hires and forms part of the Terms and Conditions of employment. It is part of the induction for new staff.

The Code of Conduct applies to TdH NL staff throughout their employment with TdH NL. It is the responsibility of the employee to be familiar with the Code of Conduct.

TdH NL will provide training and updates to the Code of Conduct as appropriate and communicate these to staff through appropriate channels. Organisational policies will provide further details and guidance related to certain aspects of the Code of Conduct.

It is the responsibility of the hiring manager to ensure that the Code of Conduct is given to all TdH NL representatives to read and sign up before carrying out any activities on behalf of TdH NL.

Signature

I understand and commit myself to the content of this Code of Conduct and agree to abide by its requirements and commit to uphold the standards of conduct required to support TdH NL' s vision, mission and values. I understand my duty to report any breaches to this Code of Conduct:

Name:

Signature:

Date:

D	D	M	M	Y	Y	Y	Y
<input type="text"/>							