



## Code of Conduct for LHL International staff

### Definitions

For this document, these definitions apply:

- Staff – refers to all LHL International (LHLI) employees, executive board members, consultants, volunteers and individuals working under the LHLI name.
- Validity – this document applies at all times during service with LHLI, including both during and after working hours on official travel.

### Requirements

All staff are required to:

- Read, understand and sign this document
- Comply with the rules, regulations, policies and applicable laws of the country in which they are present.
- Respect all people equally and without any distinction based on nationality, race, gender, level of disability, religious beliefs, class, sexual orientation, social status or political opinions.
- Take into account the sensitivities of people's customs, habits and religious beliefs and avoid any behaviour that is not appropriate in a particular cultural context.
- Abstain from all acts which could be considered harassment, abuse, discrimination or exploitation. This applies to all people of all ages, but especially to the most vulnerable, such as children or people exposed to stigma, including those living with TB and/or HIV or people with disabilities.
- Report any breach of these guidelines.

### Integrity

- Conduct all official duties with integrity, free from any taint of dishonesty or corruption, including not engaging in any act of favouritism, nepotism or bribery. This includes unfair treatment of a person or group based on prejudice, support or favour shown to friends and family, offer or consideration of any improper personal benefit.
- Not accepting from any external source without authorisation, any honour, gift, remuneration, favours or economic benefit which is more than a token gift. Any potential conflict of interest with a supplier, service provider, or business partner (such as family relations or shareholding) must be disclosed.



- Report to the Director of LHLI upon suspicion of fraud, corruption or dishonest behaviour.
- Staff is at all times subject to Norwegian legislation against corruption.

## SEAH

SEAH is short for Sexual Exploitation, Abuse and Harassment. In addition to zero tolerance for committing such acts, there is a zero tolerance for passivity towards SEAH.

All staff are required to:

- Not commit any act of “sexual exploitation” which is any actual or attempted abuse of a position of vulnerability or differential power or trust for sexual purposes.
- Not commit any act of “sexual abuse” which is the actual or threatened physical intrusion of a sexual nature whether by force or under unequal or coercive conditions.
- Not commit any act of “sexual harassment” which is unwanted sexual attention that is intended to be, or has the effect of being offensive, intimidating, hostile, degrading, humiliating or distressing. It includes sexual acts, attempt to obtain a sexual act, unwanted sexual comments or advances, or acts to traffic a person’s sexuality.
- Not engage in any sexual activity with persons under the age of 18 years, regardless of the age of majority or consent locally (mistaken belief in the age of a child is not a defence). Sexual activity includes all forms of activity and abuse of a sexual nature, with or without physical contact and regardless of whether either party is aware of such abuse.
- Not discriminate due to sexual identity etc.
- Not exchange money, employment, goods or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour. This prohibition extends to any use of sex trade workers.
- Not produce, procure, distribute or use pornographic material.
- Staff are at all times subject to Norwegian legislation against sexual offences, See legislative details from The Norwegian Criminal Law - Ch. 26., Section 295 below.

## Working conditions

LHLI is an open workplace that values health, the environment and safety. All staff have a responsibility to ensure good working conditions.

Harassment and sexual harassment are prohibited under the Norwegian Working Environment Act, Section 4-3. In addition, there is specific protection against sexual harassment and harassment based on gender, ethnicity, religion, belief, disability, sexual orientation, gender identity, and gender expression, under the Norwegian Equality and Anti-Discrimination Act, Section 13 cf. Section 6, first paragraph.



## Protection of information

- Exercise the utmost discretion regarding all matters of official business and handle all confidential and sensitive information with the greatest care.
- Not disclose sensitive information of individuals we serve where there is a risk of adverse consequences for the individuals if their identities are revealed.

## Security on duty travel

- Staff must behave in a way that will not jeopardise his or her security.
- Staff are prohibited from driving vehicles under the influence of any alcohol or mind-altering substance.
- Staff should always comply with local traffic laws and regulations.
- Staff should never use or have in their possession drugs of any kind.
- Local drivers should be used when traveling outside towns. Staff should, as much as possible, avoid driving themselves, even inside towns.
- Driving outside of towns after dark should be avoided.
- All vehicles used by staff must be mechanically sound and road-worthy.

## Follow-up

- The Director of LHLI is responsible for information and follow-up of this Code of Conduct, as well as for the implementation of necessary measures when violations are detected.
- Staff have both a right and a duty to notify any violations of this Code of Conduct. Employees are encouraged to report through the Director, unless the Director is involved, in which case one should report to a member of the board.
- People not employed by LHLI may report to the project manager they find suitable or directly to the Director.
- Detailed and up-to-date information on director and members of the board can be found on the website of LHLI.
- Staff may report anonymously, but they are encouraged to make their identity known to ease the investigation.
- All reports and concerns raised will be considered in a proper manner and treated professionally and confidentially, respecting the anonymity of the whistleblower.
- Violations of these guidelines are subject to disciplinary measures as appropriate, from warning, consideration of dismissal / termination / exclusion without undue delay, to handing over of the case to police authorities.
- LHL International provides follow-up and support to victims of e.g. sexual exploitation and prevents retaliations against people who have notified the organization of violations of these Ethical guidelines.



## Applicable Norwegian Law

### Norwegian Criminal Law on Corruption

The Norwegian Criminal Law on Corruption - from Ch 26 Fraud, Betrayal of Trust and Corruption (§ 270-280) (the text is adapted from [www.lovdatab.no](http://www.lovdatab.no))

Corruption includes anyone who for themselves, or others, accept offers of or themselves offer unwarranted advantage as part of their position or assignment. This includes positions and assignments abroad. The punishment for corruption is fines or imprisonment for up to 3 years, the same holds for accomplices. Severe corruption can be punished up to 10 years imprisonment, the same holds for accomplices.

For “påvirkningshandel” anyone who for themselves or others demand, receive or accept an offer of unwarranted advantage to affect the performance of his/her position or assignment, will be punished. The punishment includes fines and imprisonment for up to 3 years. An accomplice is punished likewise.

### Norwegian Criminal Law on Corruption

The Norwegian Criminal Law - from Ch. 26. Sexual offences, Section 295. Abuse of unequal power relationship, etc. (the text is adapted from [www.lovdatab.no](http://www.lovdatab.no))

A penalty of imprisonment for a term up to 6 years shall be applied to any person who obtains sexual activity abusing a position, dependent relationship or relationship of trust, or exploiting a person's mental illness or mental disability, or exploiting a person under 18 years of age in a particularly vulnerable life situation. Severe criminal acts can be punished up to 21 years imprisonment.

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I confirm that I have read and understood LHLI’s Code of Conduct as stated above, and I hereby agree to comply.

The newest signed versions of the document are to be kept at the current LHLI storage solution. In case of revisions that alter the content of the document, employees will be required to sign the revised version of the document.

Date:

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Name in capital letters: