

CODE OF ETHICS
of the International Charitable Foundation
“International HIV/AIDS Alliance in Ukraine”

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1. Introduction

The *Code of Conduct* (hereinafter – the Code) is a part of the Staff Manual which sets the standards of our work and helps to maintain our good reputation. The Alliance Ukraine has commitment to human rights, public health and socio-economic development approaches. They are underpinned by a set of **shared values**:

- The lives of all human beings are of equal value. People's vulnerability to HIV/AIDS is increased by unequal power relations. These arise, in particular, from poverty and the abuse of people's human rights.
- Gender, religion, class, race, ethnicity and sexual orientation are all sources of vulnerability and unequal power in most societies.
- Everyone has the right to access the information and services they need. People should have access to accurate and complete information about HIV prevention, comprehensive prevention programmes, and initiatives that promote the self-determination, dignity and quality of life for people living with HIV, and for groups who are likely to affect, or be affected by, the spread of HIV/AIDS. People have the right to access AIDS care and treatment and appropriate health and social services, including treatment and palliative care for those with AIDS.

Fundamental Requirements to be met by the Alliance Ukraine staff are:

- Integrity
- Respect of:
 - Dignity
 - Diversity
- Loyalty

Integrity includes such basic qualities as honesty, truthfulness, probity, impartiality and rejection of corruption, and respecting the human value of all people. Every staff member has to respect **dignity** as well as **diversity**, and promote the equality of all people without distinction of any kind, such as sex, race, colour, age, language, religion, political or other opinion, national or social origin, property, birth, physical or mental disability, health status (including HIV/AIDS), sexual orientation or civil, political, social or other status. **Loyalty** means that the Alliance Ukraine supports its employees in finding the right work/life balance and addressing their private challenges. Alliance Ukraine staff members, in the exercise of their functions, must be impartial by exhibiting objectivity, lack of bias, tolerance and restraint, particularly when disputes or differences arise.

These fundamental requirements determine our relationships with our colleagues, partners and contacts. What we do as individuals in the Alliance Ukraine and as an organisation must stand up to public scrutiny and expectation.

Purpose of the Code

The Code brings together some key expectations and principles regulating professional practice of the Alliance Ukraine employees, and others acting on the Alliance Ukraine's behalf. It is designed to support furthering the vision, mission and values of the Alliance Ukraine, contribute to increased efficiency and effectiveness of the organisation's activities as well as to protect and enhance our reputation and reflect our values.

Applicability of the Code

The Code applies to all members of staff and the governing bodies, including Board and Supervisory Committee members. The Alliance Ukraine expects consultants and others in respect of the work which they undertake for the Alliance Ukraine to share the principles provided for in the Code. .

Compliance with the Code

All members of Alliance Ukraine staff are expected to follow the principles and requirements contained in this Code. A breach of any of these requirements can lead to disciplinary action. The breach will be investigated before any disciplinary action is taken – see section 14.

Line managers are responsible for ensuring employees' observance of the principles and compliance with the requirements set forth in this Code. The Code has been designed for universal application. If there are inescapable legal or other special local circumstances which prevent this, the line manager must agree a variation with the Executive Director (or designated manager) and inform about it the Senior Advisory Unit on Stakeholder Relations, Risk Management and Compliance.

Obviously the Code cannot anticipate all situations. We should follow its principles when dealing with a matter that may not be expressly covered.

2. Relationships with external contacts

Our good reputation depends largely on how we work with external contacts. The Alliance Ukraine employees are expected to act in a way which maintains this reputation and respects the culture and values of anyone with whom the Alliance Ukraine works.

Alliance Ukraine Support Recipients (AIDS-service organisations and other organisations, groups and individuals that receive financial, technical or other support from the Alliance Ukraine)

The Alliance Ukraine supports community action on AIDS. Current and prospective recipients of our support (including *organisations*: national and regional AIDS-service providers, local health care providers, or *individuals*: HIV-positive people and other people vulnerable to HIV/AIDS) are best positioned to assess the quality of our work. Communications (face-to-face, telephone, electronic or written) should be prompt, courteous and efficient.

Partners

We place particular value on the successful and long-standing relationships which we have established with our partners in state, civil society and private sectors. We aim to keep these relationships positive and build on them.

Donors

Good relations with our donors are critical to the Alliance Ukraine. You should maintain and, where possible, enhance our relationship with them.

3. Behaviour towards colleagues

The Alliance Ukraine employees are collectively responsible in creating and maintaining an enabling working environment characterised by mutual respect and support.

The Alliance Ukraine is committed to eliminating all forms of discrimination, harassment and bullying in the workplace.

4. Compliance with law

The Alliance Ukraine is committed to observing the law in Ukraine and other countries where it works: the Alliance Ukraine employees must follow this principle in all dealings.

5. Confidentiality

Confidential information in any form, including written, electronic or verbal, must be protected.

On a day to day level this means that no such information, nor any other which is sensitive, must be disclosed to anyone outside the Alliance Ukraine unless the Alliance Ukraine specifically requires an Alliance Ukraine employee to do so.

Information which is confidential to the Alliance Ukraine during employment remains so after your employment with the Alliance Ukraine ends.

6. Financial management and accountability

Adherence to the Alliance Ukraine's corporate systems and standards for financial management and control is essential. Any breach puts the Alliance Ukraine's success and reputation at risk. The Alliance Ukraine is under a duty to make proper use of the funds which it receives in order to carry out its work. Its financial transactions and records are subject to regular scrutiny by auditors and state agencies.

In all financial transactions the Alliance Ukraine employees must follow the requirements set out in Staff Manual.

The accounting records which an Alliance Ukraine employee compiles or contributes to must give an accurate and complete picture of the transaction to which they relate.

7. Protection of Alliance Ukraine property

All sensible and reasonable measures should be taken to protect the Alliance Ukraine's property and assets in all forms. This duty applies not only to the risk of ordinary loss or damage but also to security precautions against fire, thieves, etc.

8. IT and telecommunications equipment and systems

In order to maintain data security and integrity, Alliance Ukraine standards for the use of IT and telecommunications equipment and systems must be observed. These standards are set out in the Chapter 8 'Information Technology' of the Staff Manual.

All Alliance Ukraine software must be used in accordance with the conditions of its license.

Computer passwords must be treated as confidential.

9. Gifts, entertainment and payments

In conducting its activity the Alliance Ukraine will not seek advantage by giving or receiving any improper gifts, entertainment or payments.

Gifts

Alliance Ukraine staff must not therefore give to, or accept from, any the Alliance Ukraine contact any gift or service, in cash or kind, which has commercial value and could be viewed as an inducement or a reward for business. This principle applies to both current and prospective contacts.

The single exception is the situation where a gift has nominal value and is a genuine token of thanks so that its offer or acceptance cannot lead to a suggestion of improper or unfair business behaviour: e.g. accept unsolicited gifts or provide gifts having an aggregate value of \$20 or less, provided that the aggregate value of individual gifts received from or provided to any one person does not exceed \$50 in a calendar year.

Gifts accepted on behalf of the Alliance Ukraine will be turned over to the Alliance Ukraine and handled as a donation according to the Law on `Charity and Charitable organisations.

Where a polite refusal is likely to cause offence or damage the Alliance Ukraine's interests staff should seek advice from the Executive Director or the Senior Management Team or Senior Advisory Unit on Stakeholder Relations, Risk Management and Compliance on how to proceed.

Entertainment

Similarly no entertainment which extends beyond normal and conventional hospitality must be offered or accepted by staff when they are undertaking the Alliance Ukraine's activity. If Alliance Ukraine employee is in any doubt he/she should seek advice from the Executive Director or the Senior Management Team or Senior Advisory Unit on Stakeholder Relations, Risk Management and Compliance.

Payments

Alliance Ukraine Staff may encounter a situation where the principles set out in this section of the Staff Manual conflict with local business practice. This is a particularly difficult area and the following guidance is intended to protect the Executive Director, Senior Management Team or any member of his/her staff facing such a dilemma.

In the Alliance Ukraine's dealings with commercial contacts and public officials staff and consultants are expected to act with honesty and integrity. Alliance Ukraine staff must avoid offering or giving them inducements, tips or similar payments.

If in doubt about any payment the Executive Director or the Senior Management Team must seek a second opinion from the Alliance Ukraine Governing Board.

10. Conflicts of interest

In order to maintain our standards of integrity, Alliance Ukraine staff must avoid any activity which is in conflict or competition with the Alliance Ukraine's activities or which may in some other way prejudice its interests. Alliance Ukraine staff must also avoid using your position as an Alliance Ukraine employee for personal gain or advantage.

- *Conflict of Interest Policy*

Alliance Ukraine employees must follow the provisions of the Conflict of Interest Policy

- *Outside employment*

The Alliance Ukraine expects its employees to notify of intention to undertake any paid employment, consultancy or other freelance work outside the Alliance Ukraine.

- *Other outside activities*

In general the Alliance Ukraine encourages outside activities and has no wish to interfere with them. Playing an active role in a local community, whether in Ukraine or overseas, helps to keep Alliance Ukraine staff in touch with the wider world. However, any activities which may damage the Alliance Ukraine or reflect badly on it must be avoided. For example, Alliance Ukraine employee should make it clear when expressing views orally or in writing about public or political issues that these are his/her own views and not the Alliance Ukraine's.

- *Public statements about the Alliance Ukraine*

Statements made to the media or to an Alliance Ukraine contact should always seek to maintain or enhance the Alliance Ukraine's good reputation. Alliance Ukraine employee must not make statements which may damage its reputation or cause a loss of confidence. This principle covers comments made about the Alliance Ukraine itself or your Alliance Ukraine colleagues and applies whether they are made formally or off-the-record. External Media Communication procedures give more detail on the subject.

- *Use of Alliance Ukraine funds and resources*

Alliance Ukraine employee must not use the Alliance Ukraine's funds, facilities or name to pursue any personal or private matter or interest.

Alliance Ukraine employee must not use Alliance Ukraine equipment, materials, computer systems or other resources to further any outside activity without first obtaining consent from his/her line manager. Occasional use of e-mail, telephone or Internet for essential domestic matters is permitted; any exceptions to the general principle must be authorised by a line manager.

11. Employment of partners, relatives or friends

In order to ensure equality of opportunity, should Alliance Ukraine employee become aware of his/her partner, relative or friend being offered an employment with the Alliance Ukraine (after going through competitive selection process on equal terms with the rest of applicants) he/she must report it to a senior manager. The employment will be given provided that it would not compromise the integrity and independence of the financial and other management control systems in operation in the office or workgroup concerned. The systems may need to be altered to ensure the necessary separation of duties is maintained.

Should a senior manager receive such an application, he or she must first obtain clearance from his/her own manager who will seek advice from Senior Advisor on Stakeholder Relations, Risk Management & Compliance, if necessary.

12. Dealing with malpractice

The Alliance Ukraine is committed to acting in accordance with the highest standards of organisational integrity and accountability. If any significant malpractice, actual or suspected, comes to attention Alliance Ukraine employee should report it as it is provided for in the Whistle-blowing policy. (Examples of malpractice include theft, fraud, false accounting or recording and serious breaches of the Code of Conduct.)

13. Duty of disclosure

- *Legal proceedings*

If Alliance Ukraine employee is involved in legal proceedings, or have any criminal convictions, which may discredit the Alliance Ukraine or bring it adverse publicity, he/she must report the matter.

- *Other situations*

There may be other situations in which failure to disclose an activity or event might prejudice the Alliance Ukraine's interests: if Alliance Ukraine employee is in doubt about disclosure he/she should discuss the matter with the line manager and/or HR team, Senior Advisory Unit.

- *Treatment of disclosures*

All disclosures will be treated as confidential.

14. Breach of the Code

A breach of the Code can lead to disciplinary procedure. A breach will be investigated before formal disciplinary action is taken. The investigation will take account of all the relevant circumstances: these will include the severity of the breach itself and whether adequate guidance had been provided to the member of staff concerned to enable him/her to be aware that his/her action was a breach. This will apply particularly where the relevant section of the Code does not refer to a separate policy or regulation.