Overview and Context

The purpose of this Code is to state CBM's commitment and define conduct which is ethical, legal, and consistent with the organisation’s values, mission and professional standards. In addition, this Code outlines and gives general guidelines to all CBM eV employees for conducting themselves in a manner that upholds and maintains CBM’s Core Values and Mission Statement, in serving to improve the quality of life of persons with disabilities in the poorest countries of the world.

This Code applies to all CBM eV employees worldwide. It also applies to family members accompanying employees stationed abroad. It also governs the appropriate conduct for CBM board members and Third Parties (i.e. donors, VIPs, celebrities, free-lancers, volunteers, consultants and media, etc.) on CBM related business. Thus, this Code applies only in the context of the relationship with CBM and third parties acting as its representatives.

The Code of Conduct is in line with current international and German standards and CBM’s policies and guidelines, such as:

- Universal Declaration of Human Rights
- Humanitarian Charter
- Accountability Charter of INGO (International Non-Governmental Organisations)
- Code of Conduct of IFRC (International Federation of Red Cross and Red Crescent Societies)
- CBM Mission Statement
- CBM Policy Preventing Corruption and Fraud
- CBM Inclusion Policy Framework
- CBM Child Safeguarding Policy
- CBM Safety and Security Policy
- CBM IT Guidelines

The CBM Code of Conduct is intended to ascertain what is commonly acceptable and appropriate behaviour within CBM’s corporate culture and not intended to police employees, although it may form the basis for disciplinary action.
Guiding Principles

1) CBM eV opposes and does not act as a willing party to wrongdoing, corruption, bribery or other financial impropriety, or illegal acts in any of its activities. CBM eV ensures accountability and transparency to its donors and stakeholders.

2) CBM eV takes prompt and firm disciplinary action whenever and wherever wrongdoing of any kind is found among its personnel.

3) CBM eV personnel are expected to conduct themselves in a manner that reflects honesty and integrity, and that maintains the effectiveness, values and mission of the organisation. These standards of conduct are maintained despite possible prevailing contrary practices elsewhere.

Standards of behaviour

While it is not possible to list all the forms of behaviour that are considered acceptable or unacceptable, the following is a partial list of the kinds of behaviour or conduct that are expected:

- Treating others with respect, dignity and impartiality regardless of gender, ethnicity, religion, sexual orientation and whether or not they have a disability;
- Ensure adherence to disability inclusive practices;
- Avoid practices which force or infer exclusion;
- Behaving in an honest, trustworthy and ethical manner;
- Trustworthy handling of confidential and sensitive information and data;
- Showing respect and adherence to the culture and law of the host country, whether professional or private, and avoiding any behaviour which may be considered offensive or even jeopardise the safety of colleagues, family members and/or oneself;

---

1 Article 18 of Universal Declaration of Human Rights: Everyone has the right to freedom of thought, conscience and religion; this right includes freedom to change his religion or belief, and freedom, either alone or in community with others and in public or provide, to manifest his religion or belief in teaching practice, worship and observance.
• Adhering to applicable laws and CBM policies;
• Adhering to safety, security and health rules and standards;
• Wearing appropriate attire (clothing, accessories, etc.) that respects local custom;
• Properly managing CBM assets, funds or other property;
• Aiming to achieve environmental best practice (eg in terms of waste disposal, energy use);
• Besides following these standards personally, CBM eV employees are also held accountable for the behaviour of others where they act as hosts, receiving and entertaining guests or visitors in CBM rented premises (residence and office) or make use of CBM vehicles or other assets.

Examples of Unacceptable Behaviour

Some forms of behaviour that are considered unacceptable, such as the partial list indicated below, may result in disciplinary action, up to and including termination of employment:

• Unlawful or dishonest activities;
• Financial impropriety in any form, including (but not limited to) bribery;
• Threatening violence or engaging in violent behaviour in the workplace;
• Theft, misappropriation or inappropriate removal or possession of any assets, funds or other property belonging to CBM, an employee or a vendor;
• Showing favouritism in the workplace (for example, showing an improper preference or allowing inappropriate factors to influence decisions regarding dealings with others, including suppliers, vendors, contractors and employees);
• Hiring relatives, friends, or members of one's ethnic group to the exclusion of other qualified persons and/or without following established CBM policies and processes;
• Falsification of records;
• Being on CBM premises or at a CBM project or activity under the influence of substances such as alcohol, drugs, etc., such that it impairs one's ability to function, puts the employee or others at risk, and/or has the potential to negatively impact CBM as an organisation;
• Use and/or possession of any illegal substances;
• Negligent or improper conduct leading to damage of CBM or third party property;
• Behaving in a disrespectful manner by, for example, using inappropriate language, harassing or causing physical harm;
• Possession of dangerous and unauthorized materials, such as explosives, firearms, or other weapons;
• Any unauthorised absence;
• Unauthorized use of telecommunications, including but not limited to telephones, mobile phones, fax machines, internet, video systems, mail system, CBM letterhead stationery or other employer-owned equipment;
• Using software without a valid licence, or copying programmes or work related data in order to make non-business use of them or pass them on to third parties.

Protection of Vulnerable Persons
The following principles of sexual behaviour outline international standards for safeguarding of vulnerable people and are considered an integral part of this guideline and in line with CBM’s Child Safeguarding Policy:
• Sexual relations with and exploitation of children are considered inappropriate and harmful to CBM’s work and reputation;
• Sexual exploitation and abuse by any CBM employee or CBM visitor constitute acts of gross misconduct and are, therefore, grounds for termination of employment and/or legal action;
• Sexual activity between any CBM employee and a child (person under the age of 18) is strictly prohibited, regardless of the age of majority or age of consent locally. In such cases, mistaken belief by any CBM employee or visitor regarding the age of a child is not a defence against disciplinary action, termination of employment and/or legal action;
• Exchange of money, employment, goods, or services for sex (including sexual favours or other forms of humiliating, degrading, or exploitative behaviour) is strictly prohibited and is a reason for termination of employment;
• Sexual relationships between any CBM employee or visitor and beneficiaries are not acceptable and will not be tolerated since they are based on inherently unequal power dynamics. Such relationships
undermine the credibility and integrity of CBM's inclusive development work;

- Where a CBM employee or visitor develops concerns or suspicions regarding sexual abuse or exploitation by a fellow employee, whether in the same agency or not, s/he must report such concerns via CBM's established reporting mechanisms.

All CBM eV employees are obliged to create and maintain an environment that prevents sexual exploitation and abuse and promotes the implementation of CBM's Code of Conduct. CBM Managers at all levels have particular responsibilities to support and develop systems that maintain this environment.

All CBM eV employees and CBM-affiliated persons (including visitors) shall be free, and in fact are encouraged to report evidence of conduct which violates or is inconsistent with the standards described in these guidelines, and CBM will adhere to policies and practices to guide their investigation of reported conduct and any resulting disciplinary action. Such policies and procedures ensure that this reporting can be done confidentially and without retaliation to the reporting person.

These standards of conduct are provided for your information. CBM eV (management or board, as appropriate) reserves the right to determine, based on international standards and this document, whether an employee or anyone working on behalf of CBM eV has engaged in inappropriate conduct or behaviour that may warrant disciplinary action up to and including termination.

**Personal Relationships between Employees**

With regards to personal relationships between employees, in particular between employees who have a direct or indirect business reporting relationship, it is strongly advised that managers take into careful consideration the effects that such involvements could have. CBM eV generally refrains from any involvement in the private lives of individuals. However, there may be some circumstances in which it becomes necessary for managers to counsel or caution where there is a conflict of interest or a negative impact on job performance. Furthermore, personal relationships of an intimate nature in the workplace can be potentially disruptive to job performance, may
negatively impact others, may damage business relationships, and may have an adverse effect on careers and CBM’s reputation as a harmonious workplace. Therefore, in the event that a personal relationship exists between employees who are in a supervisory or direct working relationship to one another, the employee who is in the position of greater influence or authority, must disclose their relationship to their line manager in order to find a solution, if the relationship may lead to a conflict of interest.

Conflicts of Interest between CBM Work and Outside Activities
CBM eV relies on employees using their good judgment in gauging their involvement in outside activities, and if necessary, raising any potential for conflicts of interest with their line manager.

What May Constitute a Conflict of Interest?
These examples may help you think through whether any potential exists for a conflict of interest:

- Will your involvement negatively impact your performance here at CBM?
- Does it involve anything that competes or conflicts with your work at CBM?
- Does it involve owning or leasing property that you know CBM has an active or potential interest in?
- Does it involve lending to or borrowing from a partner, beneficiary, donor or supplier of CBM?
- Will you receive any gift (more than a nominal value) or any entertainment / favours beyond what is associated with accepted business practice, or of any commission or payment of any sort in connection with your work for CBM?
- Are you using CBM’s name in such a way as to lend weight or prestige to your sponsorship of a political policy or cause, or to their endorsement of the product or service of another organisation?
- Are you using any CBM documents (e.g. partner, beneficiary, donor or employee lists) for furthering one’s private interests?
- Are you using your association with any educational, professional, philanthropic, social or recreational activities to the detriment of CBM’s interests or reputation?
- Are you using CBM funds or assets to lobby a political party or candidate?
If, after considering any potential for conflict of interest, you want to do business with a CBM supplier, or use CBM’s name in endorsing a cause or product, or use the fact of your employment with CBM for private purposes, please register the interest you have and your rationale with your line manager before you proceed.

Acts that violate this Code of Conduct and that are not mentioned to your line manager will be considered outside the scope of employment and may result in disciplinary action and legal sanctions being taken against those who breach them, including, where appropriate, the immediate termination of employment.

**Outside Professional Affiliations**

If you are either already a director or board member with another organisation, or are invited to serve as such, please clear this with your line manager. This also applies if you are taking up additional employment outside of CBM.

A material conflict may not exist, even if (1) a director or his or her relative has an interest in an outside firm which does business with CBM, or (2) is affiliated with an organization which receives CBM funding, or (3) may become involved in any other set of circumstances which seems to present a potential conflict of interest.

**Reporting and Incident Management**

There are various channels for external stakeholders and CBM-affiliated persons to report on any breach of this Code of Conduct. While CBM encourages everybody to report a violation or inconsistency in observance of the Code of Conduct, for all CBM employees this is a duty, if reasonable in the respective case. For an overview, please also refer to the document “Feedback and alarm systems within CBMeV”. You will find the main systems listed below:

1. The **Programme Development Feedback System** welcomes concerns, complaints, suggestions or compliments on our operations and conduct as an organisation. External stakeholders related to CBM’s programme work are invited to give their feedback about the standards of service provided by the organisation, its employees, volunteers or anybody directly involved in programme
delivery (to be found on www.cbm.org/worldwide along with a position paper).

2. The **Whistleblower System** aims to prevent, detect and follow-up on cases of fraud, corruption and misuse of funds. A protected area on allows everybody to anonymously report irregularities or risks by completing a structured report format. The software used allows an ongoing anonymous dialogue between the whistleblower and CBM, as well as a structured case management.

3. The **Red Flag System** aims to prevent and solve problems at project level at an early stage. Internal Audit has set up a checklist of critical events (focus on accountability). In case two or more critical events apply to a certain project, the Regional Office has to raise the red flag by informing Internal Audit, who will then jointly with the Regional Office discuss further action.

4. The **Dispute Resolution Process** is offered to CBM employees in the regions who are not represented by the International Office Staff Council. It aims to prevent and solve disputes and conflicts amongst CBM employees and ensure a safe, productive and healthy work environment. Each Regional Office elects two contact persons and determines one conciliator - usually the local Human Resources Manager - who is to be contacted in case of a conflict, dispute or violation of the Code of Conduct. If the dispute cannot be solved on the local level, the Vice President, Human Resources is to be involved acting as the main conciliator within CBM eV.

5. The **Crisis Management System** aims to prevent CBM employees and CBM as an organization from harm and to coordinate the response to a crisis. In case of a crisis, the CBM employee calls their line manager or regional contact person (when travelling). If this person cannot be reached or if professional support is needed, the individual calls the 24 hours CBM Internal Crisis Hotline: 0049 6251 131 555, which will take further action according to the protocol.
6. Furthermore, there are two more **contact emails** by which the public is enabled to contact CBM. They can be found on www.cbm.org/contact as well as in certain CBM publications and are aimed at receiving general enquiries: contact@cbm.org and press enquiries: press@cbm.org. However, if any complaint was sent to them, it would be forwarded to the appropriate complaint system.

7. Since CBM is especially dedicated to **Child Safeguarding**, all other entry points are aligned to report any violation against children immediately to either the Crisis Management Team or the Child Safeguarding Manager: childsafe@cbm.org.

To ensure reporting without any fear of consequences, discretion and professionalism will be exercised at all times. The incident management is described in the guidelines of each feedback and alarm system.

**Confidentiality:** Disclosures submitted under this Guideline will be considered confidential and will only be communicated on a need to know basis.

**Conclusion**

No set of specific rules can anticipate or capture every possible instance in which an ethical issue may arise. Instead, all of us must be guided by the overarching principle that we are committed to fair and honest conduct and use our judgement and common sense whenever confronted with an ethical issue.

Our reputation depends, to a very large measure, on individuals taking personal responsibility for maintaining and adhering to the policies and guidelines set forth here. Our continued cooperation in this regard is vital.
CBM is an international Christian development organisation, committed to improving the quality of life of people with disabilities in the poorest communities of the world. CBM envisages an inclusive world in which all persons enjoy their human rights and achieve their full potential.