

Code of Ethics

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A guide to the principles and philosophies of working with FSD



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CCP 17-503036-5



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The Director's Message

FSD believes that core values of honesty, integrity and respect for people underpin everything we do and are at the foundation of our organisation's principles. Conducting humanitarian, not-for-profit work, FSD is judged by how its people make decisions and execute their responsibilities in accordance with national and international laws and the ethical standards outlined in FSD's Code of Ethics.

This Code of Ethics sets universal standards to enable all our people, wherever they may work, to understand our accepted rules of behaviour that are expected to be complied with, when working for FSD. It is based on fundamental principles of FSD's beliefs, constitution and values and applies to all FSD employees and associates.

Highest importance is attached to this Code of Ethics in clarifying the standards FSD adheres to as an organisation, and therefore expects all FSD employees to respect and apply. Failure to do so may result in disciplinary action. FSD is committed to providing as much assistance as possible in order to help people to follow this Code of Ethics; functional and additional advice is available in each section along with further information for access to individual policies and procedures on the internet.

FSD encourages an open culture where people are free to ask what compliance means to them in their circumstance and role. It is also key that people who want their concerns raised or believe the Code of Ethics has been broken in any way by anyone working for FSD can be assured that their voice will be heard.

FSD's reputation and future success are critically dependent on compliance, not just with the law but also with the highest ethical standards. A reputation for integrity is a priceless quality; this Code of Ethics is a commitment across all FSD staff to integrity for all and will safeguard it throughout the organisation.

FSD includes all components of the FSD Group: Fondation Suisse de déminage (FSD) in Geneva, Switzerland; Crosstech S.A., a Geneva-based commercial subsidiary of FSD as well as the Association FSD France, based in Archamps, France.

Best regards,

Hansjörg Eberle
Director

Geneva, March 2019

I. INTRODUCTION

1.1. Purpose

This Code of Ethics outlines the core values that are integral to FSD's conception of itself as an innovative, inclusive and leading humanitarian mine action organisation, and the principles that derive from these values and to which FSD adheres as an organisation. This also includes internal and external guidelines, regulations and voluntary commitments that FSD complies with. Based on these foundations, the Code of Ethics also offers FSD employees' guidance on their professional decision-making as it sets out the standards of integrity and the rules applicable in matters of professional ethics and behaviour.

1.2. Context

Being placed at the heart of FSD's compliance framework, the Code of Ethics is to be read in conjunction with the Code of Conduct and the Administrative Regulations for International staff.

1.3. Scope

The organisational values and principles outlined in FSD's Code of Ethics, as well as the policies that result from them, are shared by and apply to all employees who enter into a working or service relationship with FSD. The policies set forth in the Code of Ethics cover all of FSD's interactions and professional dealings.

No code can address every situation an employee may encounter. As a result, FSD staff are expected to be guided by the letter and the spirit of the Code of Ethics and FSD's wider compliance framework, and to exercise good judgment. In circumstances where they are unsure as to the proper course of action, FSD employees are to seek guidance from their immediate supervisor.





II. PHILOSOPHY AND PRINCIPLES

FSD's activities and projects are based on the following principles:

- Humanity, meaning the focus on saving human lives and alleviating suffering wherever it is found.
- Impartiality, meaning the implementation of actions solely on the basis of need, without discrimination between or within affected populations.
- Neutrality, meaning that FSD operations must not favour any side in an armed conflict or other dispute where such action is carried out.
- Independence, meaning the autonomy of humanitarian objectives from the political, economic, military or other objectives that any actor may hold with regard to areas where humanitarian action is being implemented.

In addition to these, all FSD employees share a set of core values: honesty, integrity and respect for people, the fundamental importance of trust, openness, teamwork and professionalism and pride in all FSD does is a cornerstone belief.

2.1. FSD Mission Statement

The overall Objective of FSD is to promote mine action, in general, the entirety of its activities aim to alleviate and diminish the social, economic and environmental impacts of landmines and unexploded contamination worldwide. Specifically, the intent is to achieve this through the following activities:

- The prevention of threats related to landmines and other Unexploded Ordnance (UXO) as well as the heightening of mine and UXO awareness and safety training, in order to reduce the risks in suspected or declared zones of danger.
- The training of de-miners and supervisors of de-mining operations (to UNMAS standards).
- Humanitarian de-mining (general mine assessment and surveys; liaison with mine threatened communities; the marking suspected dangerous areas; the identification

- and delimitation of mine-fields; the clearance and neutralization of mines and UXO).
- Cooperation in victim assistance programs, including the rehabilitation of mine casualties and their re-integration into their socio-economic environment.
- The destruction of stockpiles of mines and other arms and munitions.
- Advocacy against the use of mines and other munitions of similar effect and impact; general contribution to the universal campaign against landmines.
- The clearance and decontamination of UXO affected areas and mines with humanitarian considerations as a primary goal.

2.2. FSD Responsibilities

FSD recognises four distinct areas of responsibility; it is the duty of management to continually assess its priorities and execute these inseparable responsibilities on the basis of that assessment. This requires balancing of short-term and long-term interests and integration of economic and social considerations into all decisions.

To beneficiaries

To carry out interventions and operations as responsible members of society and to comply with all laws and regulations, to support all fundamental human rights and to give proper regard to safety, health and security of the environment.

To employees

To respect the basic human rights of all employees and to provide them with sound and safe working conditions and fair terms and conditions of employment.

To promote the development and best use of all employees' talents in order to create an inclusive work environment where all employees have equal opportunities to develop their skills and talents. To encourage the involvement of employees in the planning and direction of their work and to provide safe channels to report concerns. FSD recognises that the success of the organisation depends on the full commitment of all employees.

To donors

To conduct all operations and management functions in line with the expectation of the donor in the most effective and efficient manner displaying value for money whilst observing all recognised doctrine and procedures. In all operations, safety will override all other factors in the planning and execution of tasks and activities.

To those with whom FSD works with

FSD seeks mutually beneficial relationships with partners, suppliers and within consortiums or joint ventures and commits to promote the application of FSD's Code of Ethics and Principles at all times. The ability to promote FSD's values and principles effectively is an important part in the decision to enter into such relationships.

2.3. Principles

The shared core values of honesty, integrity and respect of people underpins all the work that FSD does and are the foundation of FSD's principles. FSD will be judged on how it performs and acts and its reputation will only be upheld if it acts in accordance with the law and its core values and principles. FSD also encourages its partners and all stakeholders to live and abide by equivalent principles.

FSD always encourages employees to demonstrate leadership, accountability and teamwork; and through these behaviours to contribute to the overall success of the organisation as a whole. It is the responsibility of management to lead by example, to ensure that all employees are aware of FSD's principles and to behave in accordance with the spirit of its Codes of Ethics.

The application of these principles is underpinned by a comprehensive set of management and assurance procedures, which are designed to make sure all employees understand the principles and act in compliance with them.

It is also the responsibility of management to provide employees with safe and confidential channels to raise concerns and report instances of non-compliance. In turn, FSD expects its employees to report suspected breaches of FSD's principles and Codes.

2.4. Integrity

FSD insists on honesty, integrity and fairness in all aspects of its work and expects the same from all stakeholders and partners with which it coordinates with. The direct or indirect payment, acceptance or solicitation of bribes in any form is unacceptable. This is extended to any facilitation payments and they are not to be paid under any circumstance.

In line with this principle, employees must avoid any conflict of interest between private interests and their role and commitments to FSD. All transaction on behalf of, or directly by, FSD must be fairly and accurately reflected within the accounts in accordance with established procedures and are subject to audit and disclosure.

2.5. Health, Safety, Security and Environment

FSD has a systematic approach to health, safety, security and the environment management in order to achieve continuous performance management. To this end, FSD manages these matters as critical integral considerations and activities to all operations. Planning and for all interventions will outline all standards and targets for improvement and FSD will continually look for ways to reduce environmental impact of its operations and to increase the safety and security of all employees. FSD therefore seeks to:

- avoid, reduce or limit adverse environmental and social impacts and enhance environmental and social benefits from its programmes;
- preserve and protect biodiversity and sustainably manage natural resources;
- avoid adverse impacts upon the living conditions of communities;
- ensure and support health protection at work and the occupational health and safety of people working on FSD programmes;
- condemn forced labour and child labour, ban discrimination¹ in respect of employment as well as occupation and support the freedom of association and the right to collective bargaining; and
- protect and preserve cultural heritage.

2.6. Political

In line with its commitment to the humanitarian principles, FSD does not engage in any political or advocacy-based activities. This extends to relationships with and payments to any political party, organisations or their representatives. The only exception to this is the promotion of adherence to mine and cluster munitions ban treaties within the countries which FSD works. In addition to FSD commitment to non-political activity, all employees are also bound to not engage in community political activities and are to alert FSD management as soon as, or in any case where, involvement in such activities is sought.

2.7. Social Responsibility

As the values and principles set forth in this Code of Ethics indicate, FSD sees itself not only as a service provider, but decidedly as a moral actor who emphatically affirms the significance of moral practices in all professional interactions.

As a humanitarian mine action organisation, FSD naturally wants to contribute to a good society through what it does: the results of our work, which allow people to live safer lives by reducing the risk of injury or death from explosive remnants of war. But as a leader and innovator, FSD is also committed to follow the highest ethical standards in the way we produce our results: our humanitarian practices are built on our core values and reflect them in every aspect.

For FSD, social responsibility therefore means more than simply risk management or compliance with legal norms and regulations. FSD sees its social responsibility in ensuring that not only its outputs produce social good, but also that its processes and practices contribute to a better society.

Concretely, FSD is eager to maintain benevolent and respectful relationships between all FSD staff on and between all levels of the organisation. When selecting locations or beneficiaries for mine action activities, FSD always applies the humanitarian principles laid out above and never discriminates against people based on their race, ethnicity, or religion. Moreover, FSD continuously checks and works towards improving its suppliers' and partner organisations' professional and business practices. As a moral actor, FSD aims to add value and contribute to the communities within which it works by managing the social impacts of its activities and coordinating with local people.

FSD recognises that regular dialogue and engagement with all stakeholder in communities is key to the success of operations. In line with this FSD is committed to sharing and reporting on its activities to local authorities and taking a constructive interest in social matters. In all interactions with employees, partners and local communities, FSD seeks to listen and respond to social factors and concerns honestly and responsibly.

2.8. Compliance

FSD wholly commits to comply with all applicable laws and regulations of the countries in which it operates.

III. STANDARDS

There are a number of standards that FSD uses for guidance to, and compliance with, its activities. These standards cover all disciplines of FSD's operations and its management and also complement FSD's values and principles. Standards that FSD uses can be divided into general humanitarian standards, technical standards and financial and administrative standards.

3.1. External and International Standards

Many internationally recognised standards exist, however they are not common law in all of the countries in which FSD operates. FSD strives to abide by all national standards in those countries it works and where necessary also to international standards, particularly if the latter is more stringent than local laws and standards.

a) EC Humanitarian Regulations

FSD commits to adhering to the regulations and standards outlined in EC Regulation No 966/2012 (25 Oct 2013), specifically the Humanitarian Aid Regulations (HAR) and Article No7 of HAR. These outline the basics of humanitarian interventions, ethical practices and transparent operations; this common policy compliments the values and principles of FSD and also allows FSD to seamlessly operate with other partners and humanitarian operators in delivering efficient and effective operations.

b) Red Cross Code of Conduct

The Red Cross Code of Conduct is a voluntary code enforced by the will of all organisations that accept it in maintaining the standards that are laid out within it. It seeks to maintain the highest standards of independence, effectiveness and impact to which disaster response NGOs and the Red Cross aspire. FSD commits to following the principles and spirit of the code as follows:

- The humanitarian imperative comes first.
- Aid is provided without distinction of race creed or nationality.
- Aid is not used to further political or religious standpoints.
- No endeavour to act as instruments of government or foreign policy.
- Respect for culture and custom.
- Attempt to build response on local capacity.
- Programme beneficiaries should be engaged in management of relief aid where possible.
- Aid must strive to build resilience to future vulnerabilities where possible whilst meeting basic needs.
- To be held accountable to both beneficiaries and donors.
- Any victims are recognised as dignified humans.

c) SPHERE International Humanitarian Guidelines

SPHERE provides a common and universal minimum set of standards for the delivery of quality humanitarian response in the following areas:

- Water supply, sanitation and hygiene promotion.
- Food security and nutrition.
- Shelter, settlement and non-food items.
- Health action.

FSD subscribes to operating in the spirit of the guidelines set on in the SPHERE Handbook.

d) ZEWO

The ZEWO seal of approval certifies that donations and grants will be used economically, effectively and for their designated purpose. It stands for organisations which offer transparent information and true and fair financial reporting, have independent and appropriate control mechanisms, provide open communications and which procure their funds in a fair manner.

e) IMAS

The International Mine Action Standards set out all technical standards to which FSD operates to as a minimum for mine action operations. The standards are universally accepted globally

and are the basis for all national mine action standards across the World.

f) ISO 9001:2015

FSD is ISO 9001:2015 certified which demonstrates that FSD's Quality Management System is designed and implemented to set international standards.

As part of FSD's quality management process, the planning, monitoring and evaluation (PME) structure is established in conjunction with other stakeholders from the mine action sector and the broader development community. This process unfolds as follows:

- Strategic objectives are developed (Board and HQ level).
- FSD constantly monitors progress towards objectives to ensure that programmes of work remain focused and on track.
- Field monitoring missions are agreed in consultation with all stakeholders and the host government.

Missions, monthly and weekly reports and feedback from donors and beneficiaries tie-in with specific project objectives and key performance indicators (KPIs) are measured.

3.2. Internal Standards

In addition to external standards, FSD has a rigid structure of internal standards and control mechanisms in order to enforce continual improvement and compliance with its values, principles and procedures.

g) Code of Conduct

FSD's Code of Conduct is an individual pledge by each FSD staff to always abide by FSD's values and principles.

h) Staff Rules and Regulations

FSD's staff rules and regulations outline policy, procedures and instructions for all staff and details individual procedures to expand on the core values and principles of FSD. It is the base document for advice and direction on all accepted behaviour and conduct for both employees and for FSD management. Some of the key policies are outlined in this Code in the final four chapters.

i) Standard Operating Procedures

FSD's technical mine action SOPs are derived from IMAS as well as the respective national mine action standards of the countries in which FSD conducts programmes. Our SOPs further outline and detail FSD's specific interpretation of the international standards, but are equally adopted to the respective national context and mine action standards.

j) FSD Intranet

FSD maintains an intranet site as a tool for all employees whereby in depth guidance can be sought on all policies, procedures and instructions including templates, documents and reports. In addition to the repository of information, the intranet site provides a reporting tool for staff suggestions and recommendations for continual improvement and corrective/preventative actions. This helps to engender the open and honest working environment that FSD strives for and for all employees to be able to engage in the planning and direction of FSD.



IV. PERSONAL AND ORGANISATIONAL INTEGRITY

4.1. Bribery and Corruption

FSD has a clear position on bribery and corruption: FSD employees do not offer or accept bribes. The direct or indirect offer, payment, soliciting or acceptance of bribes in any form (including favours) by employees, is unacceptable. FSD promotes its policy on bribery and corruption amongst its partners, including joint ventures, contractors and suppliers. FSD complies with all national and international laws and regulations (for example the OECD Guidelines for Multinational Enterprises and the International Chamber of Commerce Rules of Conduct to Combat Extortion and Bribery) with respect to improper payments to foreign officials. In addition, FSD's Code of Conduct sets out clear standards of personal integrity.

4.2. Facilitation Payments

FSD policy makes no distinction between bribes and so-called 'facilitation' payments, which

are also prohibited. A facilitation payment is a small payment to a low-level public official, which is not officially required, to enable or speed up a process which it is the official's job to arrange. FSD also seeks to ensure that all agents, contractors and suppliers do not make facilitation payments on our behalf.

4.3. Expectation from Employees

FSD employees must never accept or give a bribe, facilitation payment, kickback or other improper payment for any reason. A "kickback" (or informally "backsheesh") is the giving or accepting of money, gifts or anything of value that is provided in return for favourable treatment. This also includes the withholding of any part of a monetary transaction or payment from either vendor or purchaser for the profit or gain of those individuals that is subsequently not entered into official accounts and a higher purchase price is indicated via invoice.

4.4. Conflict of Interest

The term "Conflict of Interest" refers to situations in which financial or other personal considerations may directly and significantly affect, or have the appearance of directly and significantly affecting, a consultants or FSD staff employee's professional judgment in exercising any FSD duty or responsibility. The bias that such conflicts may conceivably impart can adversely affect many FSD activities, including decisions about employees or the supervision or evaluation of staff; purchase of equipment and services, and the sharing of results.

4.5. Right to Privacy

FSD respects its employees' right to privacy in their personal affairs and activities however it is possible that an employees' personal or family activities may raise an actual or potential conflict with their duty of loyalty to FSD. Actual conflicts must be avoided and potential conflicts must be declared, recorded and resolved. This includes any personal interest, which may affect an employees' impartiality in any matter relevant to their duties. Employees should promptly disclose any such facts or concerns to such circumstances to their line managers as soon as practically possible.

4.6. Gifts & Hospitality

As a general principle, FSD discourages the activity of solicitation of gifts or hospitality. Notwithstanding this, FSD recognises that the occasional acceptance or offer of modest gifts and hospitality may be a legitimate contribution to sound relationships, however it is critical that such gifts or hospitality never influence financial or business decision making processes or cause others to perceive and influence.

The compliance with the other areas of this Code of Ethics in the acceptance of bribes and conflicts of interest should also be taken into consideration. FSD requires employees to abide by these rules of behaviour not only to protect its reputation but also to protect employees against unfounded allegations of improper behaviour.

It is recognised that, at times, the refusal of a gift or hospitality may be considered discourteous. In such cases all employees should take advice from higher management to ascertain if the acceptance could imply any return obligation, be perceived as a reward or is excessive in value (over \$50 USD).

4.7. Salary Benchmarking

Salary benchmarking is critical in ensuring that FSD is able to retain quality staff whilst also

displaying the best value for money for donors and all stakeholders. This is particularly important with FSD working in many different countries with varying levels of baseline living costs and expectations.

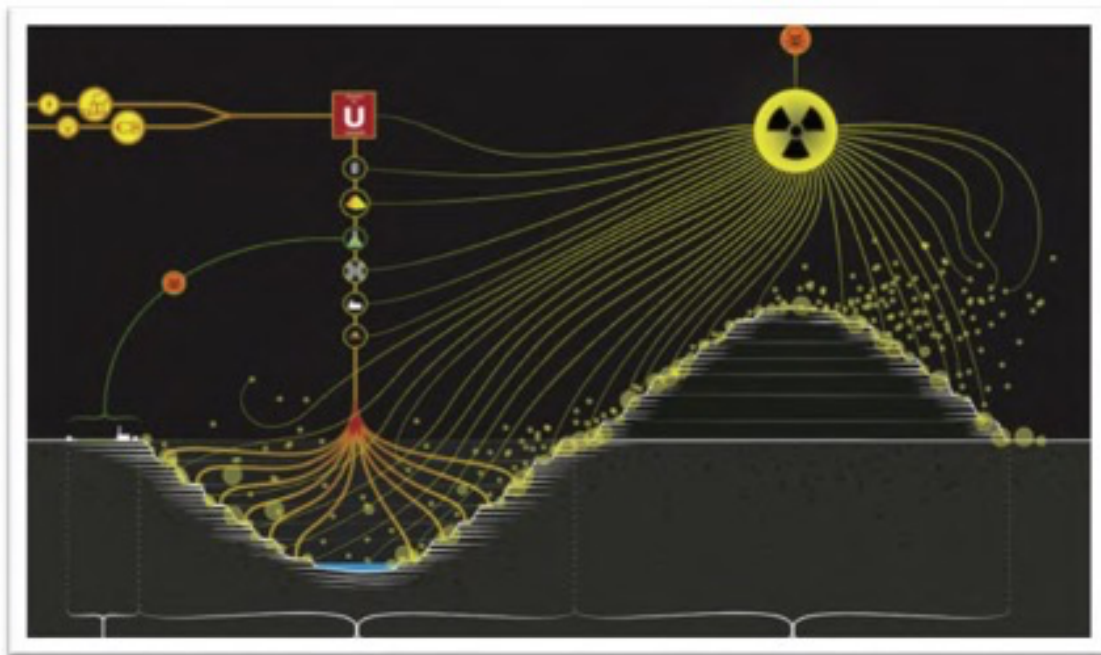
FSD conducts salary benchmarking within all the countries it works in order to ensure accurate and impartial information on salary levels. This in turn helps recruit the best staff and importantly does not impact negatively on market expectation within the community FSD works.

FSD commits to fair and transparent salary rates and conducts in-depth investigations in all countries to ensure that its remuneration packages to staff are both competitive and fair to all employees and comparable with other organisations.

4.8. Political Activity

As a humanitarian organisation, FSD takes its commitment to impartiality, neutrality and independence seriously. This is supported by FSD's values and principles and is the responsibility of management and all employees to follow its non-advocacy and non-political stance.

In addition, even where the law permits corporate political contributions or expenditures, FSD funds and resources must never be used to contribute to any political campaign, party candidate or any other affiliated organisations.



V. HEALTH, SAFETY AND ENVIRONMENT

FSD is committed to achieving excellence in all areas of its activities, including health, safety and environmental performance. FSD's overriding goal in this respect is to operate in environmentally and socially responsible ways and thereby; doing no harm to people, protecting the environment and compliance in the spirit of all internationally/nationally recognised health and safety laws and regulations. FSD aims to provide a safe, secure and healthy work environment for all their employees and it is believed that all accidents and occupational illnesses are avoidable and preventable. FSD also looks to develop and use resources, products and services in line with the above, with consideration to sustainable

development within the communities it works.

5.1. Do No Harm

Humanitarian organisations regularly operate in fragile environments that are characterized by instability and under-development. As a matter of principle, humanitarian and development projects therefore have to ensure that their implementation does not cause any further harm or bring about negative unintended consequences for any of the stakeholders involved. This “do no harm” principle explicitly also applies for humanitarian mine action (HMA) programmes. As an HMA organisation, FSD is therefore keen to not only display professionalism and excellency in its mine action activities, but also actively seeks contribute to positive peace, to protect the environment and to support social development among its beneficiaries and stakeholders. Indeed, the wellbeing of the people we are trying to help must be the focus of our efforts to help them.

To ensure that FSD’s interventions have no negative impacts on our stakeholders and beneficiaries, and in order to maintain a neutral, independent, humanitarian and impartial approach, FSD follows a do no harm framework, which is continually reviewed throughout the contract in each programme/country we work in.

In order to avoid doing any harm, FSD seeks to be conflict sensitive. To do so, FSD’s programmes are keenly aware that when they enter a context, they become part of the context, and are therefore committed to develop the ability to:

- i. Understand the context in which they operate, including all economic, cultural, social and political factors. The context constitutes the operating environment of an organisation, from the micro to the macro level (such as community, district / province, region(s), country, neighbouring countries), but also includes the social environment where conflicts / issues / tensions exist and are comprised of actors, causes, profile and dynamics. When an FSD programme identifies a conflict, this therefore requires further inquiry, with the understanding that a conflict always exists within the context and is influenced by it, but the conflict has its own important dynamics.
- ii. Understand the interaction between their intervention and the context, particularly considering the distributional effects of resource transfers to ensure that these will not undermine local strengths, promote dependency, or allow resources to be misused.
- iii. Act upon the understanding of this interaction, in order to avoid the negative impacts and maximize positive impacts. Through our operations, FSD is able to interact closely with the local communities, a strength which FSD utilises to assess the impact of our interventions.

With the do no harm framework in mind, all FSD programmes are particularly careful in considering the following decisions:

- i. *Who are the beneficiaries of activities in order to maintain neutrality between communities and national priorities?*
- ii. *Who is employed by FSD as local employees and to ensure a wide spectrum of the community, cultures, gender and tribal groups are approached?*
- iii. *What and how operations are delivered and executed across all communities?*
- iv. *Who FSD collaborates with and how?*

5.2. Sustainability

It is vital that, throughout the execution of any contract, consideration is given to the sustainability of each of the projects, both in terms of the impact it has within communities and also the development of mine action and capacity development with local communities and national authorities.

FSD working approach takes into consideration the long-term sustainability of operations in order to address the following sustainability factors:

- **Financial and Development.** Planning design and resources are formulated so as to minimise the number of international employees allocated to management and operations. All steps will be taken to employ/re-employ expertise and skills within local communities. This will have a direct benefit to local people and livelihoods in combination with procurement and interaction within the local communities. The employment of local personnel and training of local personnel in administrative, financial and logistic disciplines will widen their employability and economic development.

As access to land and contaminated areas is increased, local populations will be able to farm and produce food, crops and animal stock which will in turn increase the development and financial activity in affected areas. This is the greatest benefit to local communities' post clearance for development and financial sustainability.
- **Environmental.** The direct impact of access to land for livelihood, farming and agriculture activities, has both a financial and environmental impact. Turn over of land and increased cultivation will enhance local soil conditions and encourage innovation and development of water and sanitation systems, therefore directly affecting local environmental conditions. The legacy of these affects will last well after the closure of the project and valuable skills, disciplines and activities will be cultivated as an indirect result of the intervention. Initial KAP surveys and subsequent review of that data will help to monitor and track such impact.
- **Policy.** The development of national standards, survey techniques, assessment methods and technical mine action skills within the affected communities. In turn, this will enable national authorities and organisations to better define and refine procedures and policy towards immediate mine, UXO and ERW policy, and to longer-term socio-economic disciplines as these latter activities grow and develop.
- **Technical Capacity.** The majority of the field level technical personnel under mine-action to be employed within their respective countries will be local national employees; this will help develop a sustained capacity within the regions they are deployed. From considerable coaching, mentoring and training of technical personnel and mine action authorities, and the experience passed on from expatriate and national authorities, capacity to manage and execute mine action operations in the future will grow. This will add to regional stability, enhance local support mechanisms and reduce the threat from unexploded ordnance, ERW and mines.

5.3. HSE Standards

FSD aims to be a leader in promoting best practice within its operations and activities with a systematic approach to HSE management; in-turn this is enshrined within FSD's quality assurance procedures and continual improvement mechanisms. All FSD operations must operate within necessary national and international laws, permits, controls and approvals that are designed to commensurate HSE practices. FSD takes responsibility for fostering the same standards, awareness and responsible behaviour amongst its partners and suppliers where

possible. FSD considers environmental performance qualities as key to success in the training and selection of employees, suppliers and partners. FSD considers environmental performance qualities as key to success in the training and selection of employees, suppliers and partners.



VI. PEOPLE

6.1. Equal Opportunities & Gender Equality

FSD defines two distinct responsibilities with regards to equal opportunities and gender; that is of our commitment to those beneficiaries and communities we work within and also internally to all FSD employees.

6.2. Gender Mainstreaming and Child Awareness in Project Planning and Delivery

Mine and UXO Awareness is one of the five Pillars of Mine Action recognized by the Ottawa Treaty (1997) and referring to the UN Chart of Rights of the Child and to the Chart of Human Rights. FSD aims to integrate the protection of women and children in the context of all operations where possible. In some cases, the marginalization of women prevents their access and involvement with mine action operations and participation in open venues of exchange. However, based on FSD's experience in the field, the role of women in the "multiplier effect" in the spreading of threat messages and collection of data and baseline information is recognized as key to success. Within remote areas and villages, women are often informally questioned about whom they spoke to and whom they met during the day when they are home; gathering ERW and UXO information and data in selected places (Clinics, Girls' schools) will help bridge the correct message to other family members within close communities and villages.

As Children are the most exposed to the threats of mines, ERW and UXO when playing outside or walking to school, they are also a valuable data and information resource to be considered in approaches to clearance prioritization and consideration. Where possible, FSD commits to equal consideration of the employment of women in order to execute operations, training and community liaison will be given in order to enforce the importance of a gender balanced workforce as a cross section of society.

Women and girls especially, may also face protection risks particular to their gender such as trafficking and harmful survival mechanisms, such as survival sex. FSD therefore commits to the following considerations when prioritising women and girls in employment:

- Single heads of families.
- Widows, particularly if a husband has been lost in conflict.
- Unaccompanied girls/females.
- Females who are survivors of violence.
- Pregnant and lactating women.

Through the realisation that different people have different needs that are influenced by gender, age, ethnic group, physical ability and social roles, FSD commits to incorporating the following steps into all humanitarian planning processes:

- The use of sex and age disaggregated data to ensure projects are NOT “gender blind”.
- Where possible, provide gender analysis and highlight the impact to vulnerable groups.
- To develop gender sensitive strategies and objectives.
- Consider the use of indicators which differentiate sex and age.

6.3. Equal Opportunity

FSD provides equal opportunity to all job applicants and employees through clearly defined employment and performance standards and management systems. FSD is committed to compliance with all human resources policies and practices in all aspects of employment including recruitment, selection, hiring, evaluation, promotion, training, discipline, development, compensation and termination. In this respect FSD also ensures that its employment related decisions are based on relevant qualifications, merit, performance and other job-related factors. To demonstrate its commitment to all Equal Opportunity and Harassment matters, FSD has a “Whistle-blower” Policy, which provides employees and stakeholders a confidential channel of communication to the Board to report any instances of concern or non-conformance with these principles.

6.4. Harassment

FSD will not tolerate harassment in the workplace – that is any action, conduct or behaviour, which any individual or group of individuals finds unwelcome, humiliating, intimidating or hostile. Employees must therefore avoid actions or behaviours that are, or could be, viewed as harassment. The effects of harassment on individuals can be serious and include anger, fear, depression and feelings of helplessness and confusion. People may suffer physical or mental illness as a result, which in turn can adversely affect work performance and family life. Any FSD employee found to be harassing another employee or individual may be subject to disciplinary action, up to and including dismissal and potentially legal action.

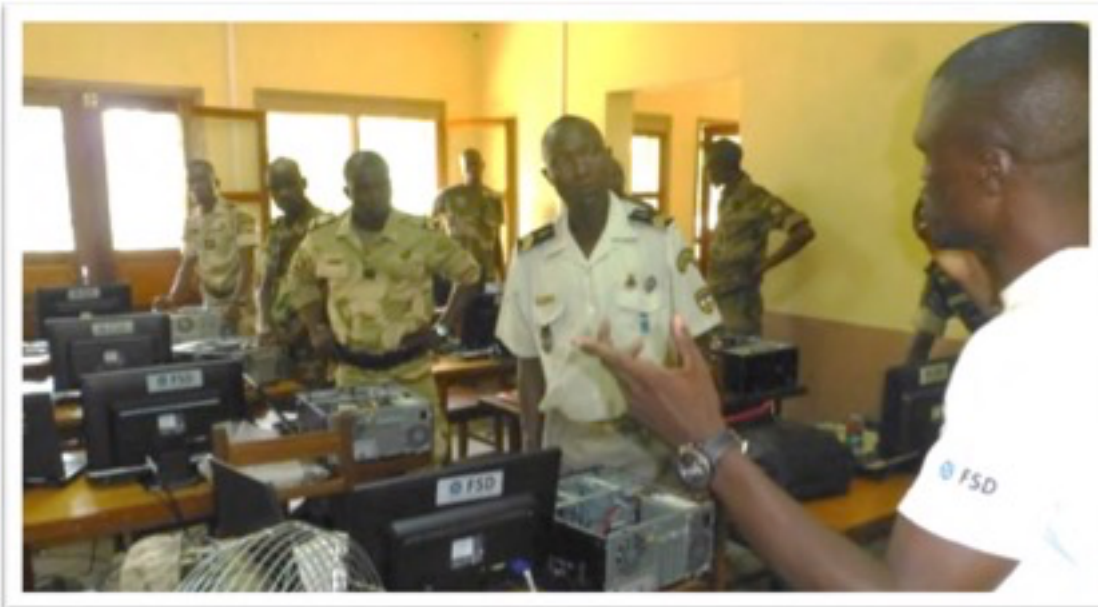
6.5. Substance Abuse

FSD is committed to providing a safe and productive work environment for all employees. This means striving to ensure, amongst other things, the workplace is free from the misuse of drugs or other substances and the abuse of alcohol. As a guide the following standards of behaviour are expected of all employees:

- i. Employees should be fit and ready to carry out their duties at all times whilst on FSD time.
- ii. Employees are prohibited from being at work with FSD while impaired by drugs or

alcohol or with illegal drugs in their systems.

- iii. The use, possession, sale or distribution of illegal drugs and the misuse of legal drugs or other substances is prohibited.
- iv. Except where authorised for special occasions, alcohol consumption is not permitted during working hours and on any FSD premises. It is the employee's responsibility to know the status of this and the local law.



VII. INFORMATION MANAGEMENT

7.1. Communications and Email

All employees and staff within FSD are required to take care when communicating both internally and externally, particularly when the communication is a written document (including email). Inappropriate, inaccurate or careless communications can create serious liability and compliance risks for FSD and wider stakeholders or donors.

Emails, in particular, are often central to litigation and regulatory investigations; they frequently provide a frank account of events inside any organisation and are virtually indestructible. It is also true that emails may be misinterpreted, taken out of context or give a misleading impression as they are one-dimensional and cannot convey emphasis or emotion easily.

FSD has an in depth guide to the use of all forms of communication and emails within its IT Policy, which is freely available to all employees and should be understood fully. Rules and best practice are designed specifically to help FSD employees communicate within the acceptable practices. The chapter on the use of emails is particularly relevant as individuals often adopt a more casual and careless approach to the style and content of an email than they would when using a more formal method of professional communication.

7.2. Personal Use of IT

FSD expects that employees who use FSD IT and communications equipment for personal reasons will apply the highest ethical standards, comply with all applicable laws and regulations and support FSD information security requirements. It is also important that the personal use of FSD IT and communications does not incur substantial cost or negatively affect

productivity.

IT and communications include desktop and laptop PCs, mobile and desk phones and personal digital assistants such as iPads, tablets, notebooks or smartphones. All use of such platforms is governed within the FSD IT Policy, especially the use of the internet, private chat networks/applications and Voice of IP (VoIP) services.

7.3. Security

The personal use of IT and communications must never endanger the security of FSD information and data. Pornographic and gambling websites are increasingly used to spread viruses, spyware and other malicious software designed to exploit vulnerabilities in personal computers and IT networks. Unauthorised installation of software may also endanger information security. FSD IT Policy strictly prohibits the use of FSD IT and communications to visit inappropriate sites or to install software without authorisation from the FSD IT department.

7.4. Data Protection

FSD follows the following principles in regards to data privacy and protection:

- i. FSD respects any individual's general right to privacy of their personal data and will accordingly adhere to all applicable laws in the use of personal data.
- ii. Personal data should only be obtained by lawful means and, where necessary, within the knowledge or consent of the data subject.
- iii. The purpose for which personal data is collected should be permitted by law.
- iv. Those with access to personal data must only use it in a way authorised by applicable law.
- v. There may be legal restrictions on transferring personal data to another party, including branch offices of FSD and its donors, partners or stakeholders; there may also be additional restrictions on transferring personal data outside of its country of origin.
- vi. Personal data created, used, transferred to or stored on FSD IT and communications devices or on media provided by, or on behalf of, FSD may, under certain circumstances, be monitored and analysed by, or on behalf of, FSD.
- vii. Personal data should be protected by reasonable security safeguards against such risks as loss or destruction or unauthorised access to, or unauthorised use, modification or disclosure of data.
- viii. If in any doubt about the handling of personal data, consult your immediate line manager or FSD HQ management.

7.5. Records and Document Management

A "record" is a sub-set of information created or received as evidence of an activity or required for legal, tax, regulatory or accounting purposes or something important to FSD identity/memory. Some examples of records and documents are: contracts; audit reports; financial information or receipts; policies, guidelines and procedures; minutes of meetings. More in-depth guidance on FSD's approach to records and documents can be found in FSD's Record and Documentation Policy.

FSD must be able to retrieve documents and records quickly and reliably. When each record's retention period is over, appropriate disposal is required.

FSD requires that documents and records must be managed securely throughout their life cycle in line with their importance to FSD and in compliance with legal, tax, regulatory accounting and professional retention requirements.