



INTERNATIONAL
CAMPAIGN
FOR TIBET

Code of Conduct

Policy on Integrity and Improper Behavior

CONTENT

1. OUR MISSION

2. BASICS of this CODE OF CONDUCT

Respect
Openness
Reliability

3. INTEGRITY

Breach of confidentiality:
Financial violations:
Interpersonal violations and abuse of power
Prevention of integrity violations

4. INTEGRITY VIOLATION COMPLAINT PROCEDURE

A. COMPLAINT SUBMISSION

The Integrity Officer
The Executive Director
The appointed Board Member
The appointed external legal mediator

B. THE COMPLAINT

C. THE PROCEDURE

Preliminary investigation
Investigation
Considerations and Recommendation for resolving the issue
Judgement, sanctions and measures
Objection to decision
Confidentiality
Substitution

1. OUR MISSION

The International Campaign for Tibet (ICT) campaigns for freedom and respect for the fundamental rights of Tibetans.

Our long-term vision is that Tibetans can freely decide their own future and shape their own economic, social and cultural development.

The Nederlandse Stichting International Campaign for Tibet (NSICT), based in Amsterdam, The Netherlands, is a non-profit organization recognized by the Dutch non-profit hallmark organization Centraal Bureau Fondsenwerving (CBF). A code of conduct reflecting the values on which NSICT wishes to base its operations is an essential requirement in this respect.

2. BASICS of this CODE OF CONDUCT

The purpose of this code of conduct is to provide guidance to employees, volunteers, free-lancers and those involved in applying NSICT's standards and values, from here onwards all will be referred to in this document as employees. The code of conduct makes it clear what are the values and norms that NSICT considers important. The code of conduct is therefore also an instrument for holding employees and their supervisors accountable for their actions and behaviors.

The basic principles of this code of conduct are respect, openness and reliability.

- **Respect** is characterized by respecting human dignity and privacy, giving space to the individual identity of persons and groups; in addition, respect relates to freedom of choice and voluntariness of individuals and groups; no one has to feel left out and there is general inclusion.
- **Openness** means informing all interested parties about all relevant data of a substantive and financial nature; all those involved contribute to a climate of freedom and a socially safe environment, in which everyone behaves responsibly and can be held accountable for his or her behavior.
- **Reliability** means that the stakeholders can assume that the information provided is truthful, that NSICT acts in accordance with the legal provisions, the established rules and good morals, that it works professionally and efficiently to achieve the set goal and that NSICT is fully and correctly accountable. ; those involved can make this transparent to the outside world. They are also open to comments and feedback. Conflicts of interest, but also the appearance thereof, are prevented.

Many integrity standards are laid down in laws and other binding regulations with which the NSICT complies, such as the Dutch General Data Processing Regulation (AVG), the regulations and codes of conduct of relevant bodies such as the CBF, the Advertising Code Committee and its own sector organizations such as “Goede Doelen Nederland”.

This code of conduct describes what is expected of an employee and how an employee behaves when representing NSICT in any capacity internally as well as externally. The code of conduct and the ethical conduct of those involved in the spirit of the code of conduct form the basis for the cooperation. NSICT strives for an open culture in which everyone can point out (possible) conflicts of interest to each other.

The core values of this Code of Conduct also extends to the activities of ICT Netherlands that are not defined by employee relations such as: public events and internet publications, etc. of the organisation.

3. INTEGRITY

NSICT distinguishes three clusters of integrity violations based on the CBF Recognition Regulations, Article 6:

- **1. Breach of confidentiality:**
Corruption, conflicts of interest, leaking of confidential information, culpable negligence, (cyber) security;
- **2. Financial violations:**
Fraud, theft, abuse of resources or services, culpable wastefulness;
- **3. Interpersonal violations and abuse of power:**
Discrimination, intimidation, humiliation, violence, bullying, sexual harassment, sexual intimidation, sexual violence.

Prevention of integrity violations

- Integrity violations in whatever form – and at whatever level – are not accepted within NSICT. These regulations are designed to prevent and resolve arbitrary and/or inconsiderate treatment within NSICT. Employees who are nevertheless confronted with such improper behaviour shall be provided with appropriate remedies to put an end to this.
- NSICT pursues an active policy using the appropriate means for the prevention and resolution of integrity violations.
- The employer considers itself obliged to pursue a coherent policy that prevents and resolves integrity violations.
- Integrity violations can be reported by anyone who are witnesses or victims through four channels: Integrity Officer, Executive Director, appointed Board Member and as last resort an external legal mediator.
- On a regular basis, the management, along with the Integrity Officer, is obligated to sensitise the staff to adhere to an ethical code of conduct.

4 INTEGRITY VIOLATION COMPLAINT PROCEDURE

A. COMPLAINT SUBMISSION

The complaint procedure comprises four channels of submission through which whistleblowers can report violations:

1. The Integrity Officer
2. The Executive Director
3. The appointed board member
4. The appointed external legal mediator

Ad 1 The Integrity Officer

The first channel is the standard channel and concerns a direct complaint to the Integrity Officer who is appointed by NSICT. Within the integrity mechanism the Integrity Officer acts as a first point of contact for the victim or witness, i.e. whistleblower. The Integrity Officer is the operational coordinator of the investigation process. The whistleblower can submit a written complaint both digitally to report@savetibet.nl or by hand to the Integrity Officer.

The Integrity Officer is tasked with providing first-line assistance to whistleblowers who are witnesses or victims of a violation. The Integrity Officer will take no action and will not report the violation to the violation reporting mechanism, unless asked by the whistleblower. The Integrity Officer shall listen to,

assist, support and advise the whistleblower. Conversations between the Integrity Officer and the whistleblower are strictly confidential.

The Integrity Officer shall provide advice, on request or otherwise, to the Executive Director and other employees of the organization on the prevention and resolution of improper behaviour.

The conversations with the Integrity Officer serve multiple purposes:

1. To give the affected witness or victim an opportunity to tell his or her story.
2. To clarify whether the complaint concerns a workplace conflict, a moral doubt or an integrity violation.
3. To establish what are the possible steps, taking into account that the interests and protection of the whistleblower are paramount.
4. The whistleblower is entitled to receive support from the Integrity Officer in reaching a decision to take further steps.
5. The Integrity Officer guides the victim or witness to report the identified complaint.

If the Integrity Officer is absent for more than three weeks in a row from the moment that the violation has been reported and is therefore unable to respond to the reported violation on time, the whistleblower will (be requested to) redirect the complaint to the Executive Director or the appointed Board Member who will deal with the complaint and / or redirect the complaint to the Integrity Officer after his absence.

If the complaint concerns the Integrity Officer and the Executive Director, the whistleblower can approach the appointed board member. If the complaint concerns the Integrity Officer, the Executive Director and the appointed board member, the whistleblower can approach the appointed external legal mediator.

Ad 2 The Executive Director

If the complaint concerns the Integrity Officer or if the Integrity Officer is directly involved in the violation being reported, the whistleblower can approach the Executive Director with a written complaint. The Executive Director shall initiate an investigation and, if required, hires an external investigator.

Ad 3 The appointed Board Member

The channel of the appointed Board Member can be used in the following situations:

If the reporting victim, witness or whistleblower does not receive any notification within two months from the Integrity Officer or the Executive Director about the steps to be taken in response to the report, the victim, witness or whistleblower themselves will notify the appointed Board Member. The appointed Board Member then shall notify the Integrity Officer or respectively Executive Director with the urgent request to undertake action as soon as possible. If the reporting victim, witness or whistleblower has still not received notification after one month after the notification of the appointed Board Member, he/she will report this to the appointed Board member. The appointed Board Member shall report this to the Board of NSICT.

If the Executive Director is directly involved in the violation being reported or if the Integrity Officer and the Executive Director both are involved in the violation reported, the following steps will be taken. In this case, the victim, witness or whistleblower can approach the appointed Board Member with a written complaint. The appointed Board Member shall conduct an investigation together with the Integrity Officer or – if the Integrity Officer is involved in the reported violation - with the external mediator, as coordinator of the investigation process. If necessary and depending on the type of integrity

violation, an external investigator will be involved. If the violation is reported directly to the appointed Board Member, the identity of the victim or witness can be protected on his or her request and the report shall remain anonymous.

If the Executive Director is absent for more than three weeks in a row from the moment that the violation has been reported the victim, witness or whistleblower can approach the appointed Board Member with a written complaint. The appointed Board Member shall conduct an investigation together with the Integrity Officer or – if the Integrity Officer is involved in the reported violation - with the external mediator, as coordinator of the investigation process. If necessary and depending on the type of integrity violation, an external investigator will be involved. If the violation is reported directly to the appointed Board Member, the identity of the victim or witness can be protected on his or her request and the report shall remain anonymous.

Ad 4 The appointed external legal mediator

If and when, for whatever reason, none of the above mentioned three channels of submission of the complaint is available due to (constant) absence or involvement in the reported violation, the victim, witness or whistleblower can approach the appointed external legal mediator with a written complaint.

B. THE COMPLAINT

The written complaint must consist of the following points:

- the relevant date(s);
- involved parties;
- description of the improper behaviour;
- (non-)approval to commence the violation complaint procedure;
- signature.

The Integrity Officer will send an acknowledgement of receipt of the complaint within one week.

The identity of the victim or witness will be protected on his or her request and the complaint shall remain anonymous. Once the violation complaint procedure is set in motion the Integrity Officer will take the complaint to the next level.

The Integrity Officer will initiate an investigation. Once the initial investigation is finished, the Integrity Officer will inform the Executive Director within one week after receiving the complaint. Within 10 days after this the Executive Director will decide the next step together with the Integrity Officer, unless the Integrity Officer and or the Executive Director is / are directly involved in the violation. In that case one or two of the other submission channels will initiate the necessary further steps as set out below.

C. THE PROCEDURE

a. Preliminary investigation

- Reports of improper behaviour must be submitted in writing to one of the four channels mentioned above: Integrity Officer, Executive Director, The appointed Board Member or The appointed external mediator. The victim or witness has the right to make the report anonymously to the Executive Director or The appointed Board Member. Reports to the Integrity Officer or The appointed external mediator cannot be made anonymously.
- After receiving a report (via any of the four channels), the Executive Director or the appointed Board Member will carry out a preliminary investigation together with the Integrity Officer

within two weeks. If the victim, witness or whistleblower wishes to consult an external advisor, the Integrity Officer and Executive Director can decide to involve an external investigator.

- The purpose of this preliminary investigation is to determine whether a disciplinary investigation or other follow-up action is required in response to this report. The first thing that needs to be determined is whether a violation has actually taken place. The next step is to establish whether there are reasons for concluding that the accusation cannot be true and whether there is any evidence. Finally, a judgement must be made as to whether the investigation might cause damage that is disproportionate to the violation.

b. Investigation

- If the Executive Director, the victim or whistleblower and/or external investigator conclude that a proper investigation is necessary, the Integrity Officer will draw up a proposal for the investigation based on a protocol that sets out the powers of the investigators and protects the rights of all persons involved. This proposal contains the conclusions of the preliminary investigation, the names of the nominated internal or external investigator(s), the budget (if applicable), the wording of the investigators' assignment and the questions to be answered during the investigation.
- The victim, witness or whistleblower and the subject of the complaint have the right to receive legal assistance and can choose to view the relevant documents. The victim, witness or whistleblower or the subject of the complaint may also require the involvement of the external investigator.
- The Executive Director, the appointed Board Member and/or an external investigator are authorised to hear other employees who are relevant to the investigation.
- A written report is made of every session and is signed as read and understood by all persons involved. If any person involved refuses to sign, the reason is mentioned in the report.
- The Executive Director (who may involve the appointed Board Member) can decide to have an investigation carried out by experts of an independent consultancy, to which all parties agree, at the employer's expense.
- If the investigation is carried out by external investigators, the Integrity Officer – or another initiating channel - shall act as coordinator. He/she monitors the progress and budget. When the investigation is completed, the Integrity Officer presents the investigator's final written report to the Director together with an explanatory document written by him or herself.
- The Executive Director, Integrity Officer, and/or Whistleblower assess the quality of the external investigators' work and challenge the experts with critical questions about their method and conclusions.
- With complicated investigations, it will almost always be necessary to enlist external investigators. The choice of consultancy shall depend on the nature of the violation.
- If the investigation is not carried out by external investigators, the final written report will be drawn up by the Executive Director, Integrity Officer, and/or the appointed Board Member.
- Within one month of receiving the report from the Integrity Officer, the Executive Director (and/or external investigator) conducts separate interviews with: the Whistleblower who has submitted the complaint, the subject(s) of the complaint and any witnesses.

c. Considerations and Recommendation for resolving the issue

- The final written report has to be drawn up as soon as possible, but no more than four months after the complaint was submitted.
- The report shall at least contain:
 - the name of the subject of the complaint;
 - the possible victim(s) of the improper behaviour;
 - a description of the complaint;
 - the assessment of the plausibility of the complaint;
 - advice to the employer on appropriate measures (including any sanctions) for the specific case in hand;
 - advice to the employer on appropriate general measures.
- If the four-month deadline cannot be met, the reporting victim or witness and the subject of the complaint are notified in good time and given a new timeline.
- A copy of the written report is sent to those directly involved as well as to the Counselor if he/she was involved in the complaint. On the basis of a motivated request, it may be decided to anonymize or completely withhold statements from witnesses and others involved that concern the distribution of this written report.
- In case the Executive Director is the subject of the complaint, the appointed Board Member will inform the board. The board will take the necessary measures in accordance with their responsibilities.
- All parties directly involved can submit a short-written response to the Integrity Officer or Executive Director within fourteen days after sending this final report.

d. Judgement, sanctions and measures

- The Executive Director makes a decision about the measures to be taken at the individual level within 4 weeks of the final written report. The Executive Director bases the decision on the advice written in the report. The Executive Director shall only deviate from the advice in consultation with the Integrity Officer or the appointed Board member and shall explain the reasons for the deviation in the written decision.
- Depending on the severity of the complaint(s), the Executive Director can impose various sanctions on the subject of a proven complaint. These include:
 - a written reprimand
 - a suspension
 - or a (conditional) dismissal
- A copy of the decision is sent to those directly involved.
- If the complaint is not upheld, the Executive Director shall take the necessary measures to normalise the situation at the workplace. The External Investigator / Counselor and Integrity Officer shall be requested to advise on this.
- In the case of a deliberately false complaint, the Executive Director shall take appropriate measures to rehabilitate the subject of the complaint. Appropriate measures shall also be taken against the person who deliberately submitted the false complaint.

e. Objection to decision

- Anyone involved who objects to the Executive Director's decision can submit a written objection within 14 days, stating reasons, directly to the Executive Director. The Executive Director shall respond to the objection within 14 days.
- If the Executive Director's reaction is not found to be satisfactory, the objecting person can take the matter to the appointed Board Member or the competent court.

f. Confidentiality

- All persons involved are required to keep the information that comes to their knowledge strictly confidential. Also, the Board is required to keep the information to their knowledge strictly confidential.

g. Substitution

- Various roles and activities are assigned to the Integrity Officer and the Executive Director above. If one or both of them are involved in the reported complaint, the role assigned to them above will be taken over by one of the two or three other channels of complaint submission or third parties specifically designated or engaged by them for this purpose.

Contact email: report@savetibet.nl