

SNEHA'S CODE OF CONDUCT

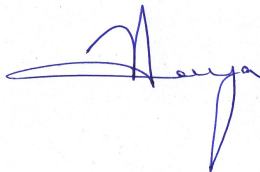
Dear SNEHA employees and consultants,

The values and principles which govern the manner in which SNEHA as an organization and its employees conduct themselves is being articulated as the SNEHA Code of Conduct. This Code is intended to serve as a guide to each employee on the values, ethics and operating principles expected from them in personal and professional conduct.

I urge each employee to read the Code of Conduct document and take pride in upholding the high standards of professional and personal behavior on which SNEHA's reputation and respect has been built over the past 20 years.

You are requested to sign and return the last page (ANNEXURE A) of this Code of Conduct to HR within 7 days of receipt of this email.

Yours sincerely,



Vanessa D'Souza

CEO

Date: December 2, 2020

What is a Code of Conduct:

A code of conduct, are the policies and rules of the organization that all employees and consultants are expected to follow. They are guidelines on how people should appropriately behave at the workplace and in the communities to reflect the mission and values of SNEHA. It also covers how staff / consultants are expected to interact with external stakeholders.

By NOT following the code of conduct, you are putting your organization, your colleagues and external stake holders at risk, which is detrimental to all stakeholders of SNEHA.

Why is a Code of Conduct important?

A code of conduct is created by organizations to ensure everyone can feel comfortable at work or in the communities we serve. When staff treat each other and external stake-holders with integrity and respect, they can avoid conflicts and work together in harmony.

- **Demonstrate SNEHA's values:** When an organization has its code of conduct posted on its website, people interested in the organization, such as potential job candidates, vendors or other stakeholders, can learn more about the organizations ethics, values and morals. SNEHA's values and behaviours that demonstrate those values are clearly defined and all employees / consultants are expected to practise SNEHA values in their day to day work
- **Provide guidelines for behaviour:** A clear set of rules and expectations can help employees/consultants understand what behaviours are appropriate for work. This way, they can create better relationships with their co-workers.
- **Act within the law:** A code of conduct includes compliance of local / state / national/ international laws and "best practises" that are expected to be followed by all employees / consultants.
- **Increase employee morale:** When employees treat each other equally and with respect, everyone tends to feel more satisfied with their workplace. This can help organizations retain and attract more employees.
- **Measure employee success:** Organizations can better measure their employees' success when they have a code of conduct. Within their policies, employers should discuss all the rules of the workplace. If they notice an employee isn't following the rules in the code of conduct, the organization can pinpoint exactly what the employee needs to improve.

SNEHA has several internal policies like HR Policy, Information Management (IM) Policy, M&E Policy, Research Policy, Finance Policy, Prevention of Sexual Harassment at Workplace Policy, Purchase Policy etc which outline the rules and regulations that govern all SNEHA employees / consultants at SNEHA.

In addition to all these policies, SNEHA would also like to outline a Code of Conduct to cover some areas that may not be covered in the above policies. The Code of Conduct is not comprehensive of all policies to be followed and must be complied with, in addition to all other existing SNEHA policies.

Compliance of Code of Conduct:

All SNEHA employees and consultants are expected to comply with SNEHA's Code of Conduct. Non-compliance of SNEHA's Code of Conduct can lead to disciplinary action, and even termination.

The Code of Conduct maybe revised from time to time and any changes will be officially intimated to all employees / consultants, who are expected to read and comply with the same.

SNEHA's Code of Conduct broadly covers the following:

Clause:1

Community Interest

SNEHA is committed to the health and safety of women, children and families of the communities in which it operates. SNEHA will not undertake any project or activity to the detriment of the wider interests of the communities in which it operates.

SNEHA's management practices shall benefit women, children, families, localities and communities in which it operates, to the extent possible and affordable, and shall be in accordance with the laws of the land.

SNEHA, in the course of its community and operational activities, shall respect the culture, customs and traditions of communities in which it operates. It shall conform

to government procedures, including licensing, documentation and other necessary formalities, as applicable.

Clause:2

Compliance of Policies – Financial & Non-Financial:

SNEHA receives grants from a range of donors and is expected to expend the funds with the highest level of personal integrity in compliance with donor expectations and agreements, prevailing laws and regulations and any other operating principals that demonstrate the highest level of conduct. Every SNEHA employee and consultant is expected to follow the highest standards of ethical practices and maintain the highest reputation of SNEHA. They are expected to comply with all SNEHA's guidelines and policies including, but not limited to SNEHA's Purchase Policy, Human Resource Policy, Finance Policy, Administration Policy, Monitoring & Evaluation and Research Policy, Prevention of Sexual harassment at Work Place (POSH) Policy, Data Management Policy and such other policies and guidelines that may come into force from time to time.

Clause 3:

Finance & Accounting:

SNEHA shall prepare and maintain its accounts fairly and accurately and in accordance with the accounting and financial reporting standards which represent

the generally accepted guidelines, principles, standards, laws and regulations of the country in which the organization conducts its affairs.

Internal accounting and audit procedures shall reflect, fairly and accurately, all of the organization's transactions and disposition of assets, and shall have internal controls to provide assurance to the organization's board and donors that the transactions are accurate and legitimate. All required information shall be accessible

to statutory auditors and donor's auditors, other authorized personnel, parties and government agencies. There shall be no willful omissions of organizations transactions from the books and records, no advance-income recognition and no hidden bank account and funds.

Any willful, material misrepresentation of and / or misinformation on the financial accounts and reports shall be regarded as a violation of the Code of Conduct, apart from inviting appropriate civil or criminal action under the relevant laws. No employee shall make, authorize, abet or collude in an improper payment, unlawful commission or bribing.

Clause:4

Equal opportunities employer

SNEHA shall provide equal opportunities to all its employees and all qualified applicants for employment without regard to their race, caste, religion, colour, ancestry, marital status, gender, sexual orientation, age or disability.

As an organization that works on issues of women and children in the communities, SNEHA shall promote employment of women in the organization. Human resource policies shall promote equality in the workplace, as well as compliance with all local labour laws, while encouraging the adoption of best practices.

Employees of SNEHA shall be treated with dignity and in accordance with the organization's "Prevention of Sexual Harassment Policy at Workplace" of maintaining a work environment free of all forms of sexual harassment, whether physical, verbal or psychological. Employee policies and practices shall be administered in a manner consistent with applicable laws and other provisions of this Code of Conduct, respect for the right to privacy and the right to be heard, and that in all matters equal opportunity is provided to those eligible and decisions are based on merit.

Further SNEHA also strives to create an enabling environment for its employees and consultants through its Grievance Policy where all forms of workplace harassment can be reported and appropriate action taken

Clause:5

Bribery / Gifts / Donations

SNEHA as an organization and its employees shall neither receive nor offer or make, directly or indirectly, any illegal payments, remuneration, gifts, donations or comparable benefits that are intended, or perceived, to obtain uncompetitive favours for the conduct of its operations and activities. SNEHA management shall cooperate with governmental authorities and/or other authorized agencies in efforts to eliminate all forms of bribery, fraud and corruption.

All employees and consultants are expected to comply with *SNEHA's Gift Policy*

Clause:6

Government Agencies

SNEHA and its employees shall not, unless mandated under applicable laws or under the project SNEHA has undertaken, offer any or give any organization funds or assets as donation to any government agency or its representative, directly or

through intermediaries, in order to obtain any favourable performance of official duties.

Clause:7

Political Non-Alignment

SNEHA shall be committed to and support the constitution and governance systems of the country in which it operates.

SNEHA shall not support any specific political party or candidate for political office. The organization's conduct shall preclude any activity that could be interpreted as mutual dependence / favour with any political body or person, and shall not offer or give any funds or property as donations to any political party, candidate or campaign.

Clause:8

Health, Safety and Environment

SNEHA shall strive to provide a safe, healthy, clean working environment for its staff, within our resources. It shall endeavor to prevent the wasteful use of resources.

Clause:9

Non-Profit Citizenship

SNEHA shall be committed to good non-profit citizenship, not only in the compliance of all relevant laws and regulations but also by actively assisting in the

improvement of quality of life of the people in the communities in which it operates. SNEHA shall encourage volunteering and collaboration with community groups.

SNEHA is committed to develop systematic processes and conduct management reviews from time to time so as to set and review strategic direction for achieving its vision.

Clause:10

Cooperation with other organizations

SNEHA shall collaborate with other non-profit organization's, organization's in the private sector / public sector as it deems appropriate, including by sharing knowledge in compliance with it's policies / practices on confidentiality and sharing of data, resources, communication material etc

Clause:11

Public Representation

SNEHA honours the information requirements of the public and its stakeholders. In all its public appearances, with respect to disclosing the organization's information and information about its activities to public constituencies such as the media (including social media), employees, donors and vendors, the organization shall be represented only by specifically authorized SNEHA employees or members of the Trustee board. It shall be the sole responsibility of these authorized representatives to disclose information about the organization and its activities, in compliance with SNEHA policies and guidelines.

Clause:12

Third Party Representation

Parties which have dealings with SNEHA but are not employees or consultants of SNEHA, such as agents, community or public system partners, funders / donors, contractors, vendors and suppliers, shall not be authorised to represent SNEHA without the written permission from the SNEHA management, and / or if their professional conduct and ethics are known to be inconsistent with the Code of Conduct .

Third parties and their employees are expected to abide by the Code of Conduct in their interaction with, and on behalf of SNEHA. **SNEHA shall sign a nondisclosure agreement with third parties to support confidentiality of information wherever felt necessary.**

Clause:13

Use of SNEHA Brand

No employee / consultant / third party shall use the SNEHA logo and/or its name to further its interests without specific written authorization from the SNEHA management.

Clause:14

Donors

SNEHA management shall duly and fairly inform its donors about relevant aspects of the organization's activities, and disclose such critical information in accordance with relevant regulations and agreements.

Clause:15

Ethical Conduct

Every employee and consultant of SNEHA shall exhibit culturally appropriate deportment and deal on behalf of SNEHA with professionalism, honesty and integrity, while conforming to high moral and ethical standards. Such conduct shall be fair and transparent and be perceived to be so by third parties.

Every employee / consultant of SNEHA shall preserve the human rights of every individual and shall strive to honour commitments. Every employee/consultant shall be responsible for the implementation of and compliance with the Code of Conduct in his / her environment. Failure to adhere to the Code of Conduct could attract consequences, including termination of employment.

Clause:16

Regulatory Compliance

Employees/ Consultants of SNEHA, in their professional conduct, shall comply with all applicable laws and regulations, in letter and spirit. If the ethical and

professional standards of applicable laws and regulations are below that of the Code of Conduct, then the standards of the Code of Conduct shall prevail.

All levels of employees and consultants, including Senior management (CEO, Executive Director, Directors, Associate Directors) of SNEHA shall comply with applicable laws and regulations of all the relevant regulatory and other authorities. As good governance practice they shall safeguard the confidentiality of all information received by them by virtue of their position.

Clause:17

Concurrent Employment

Consistent with applicable laws, an employee of SNEHA shall not, without the requisite, officially written approval of the management, accept employment or a position of responsibility (such as a consultant or a director) with any other organisation nor provide freelance services to anyone with remuneration. In the case of a fulltime director or the CEO, such approval must be obtained from the Board of Trustees.

Clause:18

Conflict of Interest

An employee or consultant of SNEHA shall always act in the interest of SNEHA, and ensure that any professional or personal association which he / she may have

does not involve a conflict of interest with the operations of SNEHA and his / her role therein.

An employee of SNEHA, shall not accept a position of responsibility in any other non-profit organization, Private or Public sector organization without specific management approvals.

The above shall not apply to (whether for remuneration or otherwise):

- a) Memberships / positions of responsibility in educational / professional bodies, wherein such association will benefit the employee / SNEHA.
- b) Nominations / memberships in government committees / bodies or organization.
- c) Memberships as “External member” in POSH committees, subject to compliance of SNEHA’s POSH Policy
- d) Exceptional circumstances, as determined by the competent authority.

Competent authority, in the case of all employees / consultants, shall be the CEO, who in turn shall report such exceptional cases to the Trustee board on a quarterly basis. In case of the CEO and directors, the Trustee board shall be the competent authority.

An employee/ consultant of SNEHA shall not engage in any business, relationship or activity which might conflict with the interest of SNEHA. A conflict of interest, actual or potential, may arise where, directly or indirectly :

- a) An employee/consultant of SNEHA engages in a business, relationship or activity with anyone who is party to a transaction in SNEHA.
- b) An employee/consultant is in a position to derive an improper benefit, personally or to any of his / her relatives, by making or influencing decisions relating to any transaction.
- c) An independent judgement of the organization's best interest cannot be exercised.

The main areas of such actual or potential conflicts of interest shall include the following:

- a) An employee/consultant of SNEHA conducting dealings on behalf of SNEHA or being in a position to influence a decision with regard to the organization's dealings with a supplier or vendor where his / her relative is a principal officer or representative, resulting in a benefit to him / her or his / her relative.

- b) Award of benefits such as increase in salary or other remuneration, posting promotion or recruitment of a relative of an employee/consultant of SNEHA, where such an individual is in a position to influence decisions with regard to such benefits.

- c) SNEHA's interest can be compromised or defeated.

Notwithstanding such or any other instance of conflict of interest that exist due to historical reasons, adequate and full disclosure by interested employees/consultants shall be made to SNEHA's management. It is also incumbent upon every employee to make a full disclosure of any interest which the employee or the employee's immediate family, including parents, spouse and children, may have in a family business or a company or firm that is a supplier, contractor or distributor or has any other dealings with SNEHA.

Upon a decision being taken in the matter, the employee concerned shall be required to take necessary action, as advised, to resolve / avoid the conflict. If an employee fails to make the required disclosure and the management of its own accord becomes aware of an instance of conflict of interest that ought to have been disclosed by the employee, the management shall take a serious view of the matter and consider suitable disciplinary action against the employee, including termination of employment.

Clause:19

Confidential Information

An employee/consultant of SNEHA and his / her immediate family shall not derive any benefit or counsel, or assist others to derive any benefit, from access to and possession of information about SNEHA or its beneficiaries, funders or suppliers that is not in the public domain and, thus, constitutes unpublished insider information.

Such insider information might include (without limitation) the following:

- a) Funders, Funding status
- b) Project plans
- c) Restructuring plans
- d) Agreement clauses
- e) Investment decision and plans
- f) Beneficiaries data/ information

An employee of SNEHA shall also respect and observe the confidentiality of information pertaining to other stakeholders, their patents, intellectual property rights, trademarks and inventions; and strictly observe a practice of non-disclosure. All employees and consultants are expected to retain the confidentiality of information obtained while at SNEHA, even after they have resigned from SNEHA.

Clause:20

Protecting Organization Assets by SNEHA Staff

SNEHA's assets shall not be misused; they shall be employed primarily and judiciously for the purpose of conducting activities for which they are duly authorized. These include tangible assets such as equipment's, systems, facilities, materials and resources, as well as intangible assets such as information technology and systems, proprietary information, intellectual property, research etc. Any assets given to employees / consultants for the purpose of carrying on his/her work, is to be returned in good working condition at the time of resignation. Even after an employee resigns or contract ends, all intangible assets are to be retained by SNEHA and cannot be shared externally

Clause:21

Citizenship

The involvement of SNEHA employees and consultants in his or her personal capacity in civic or public affairs shall be with express approval from the CEO, subject to this involvement having no adverse impact on the affairs of SNEHA.

Clause:22

Integrity of Data Furnished

Every employee/consultant of SNEHA shall ensure, at all times, the integrity of data or information furnished by him/her to the organization. He/she shall be entirely responsible in ensuring that the confidentiality of all data is retained and

in no circumstance transferred to any outside person/party in the course of normal operations without express guidelines from or, the approval of the management.

Clause 23:

Terrorism & Human Trafficking Prohibitions

Every employee / consultant of SNEHA is prohibited from involvement in any transactions with, and the provision of resources and support to, individuals and organizations associated with terrorism and human trafficking

Clause:24

Reporting Concerns

Every employee /consultant of SNEHA shall promptly report to the management, when she / he becomes aware of any actual or possible violation of the Code of Conduct or an event of misconduct, act of misdemeanor or act not in SNEHA's interest. Such reporting facility shall be made available to suppliers and partners too.

Any SNEHA employee can choose to make a protected disclosure under the Whistleblower Policy of SNEHA.



SNEHA shall ensure protection to the whistleblower and any attempts to intimidate him / her would be treated as a violation of the Code of Conduct.

Note:

Employees/consultants have a continuing obligation to familiarize themselves with all applicable laws, organization policies, procedures and work rules. Every employee is obligated to read, understand the SNEHA Code of Conduct and sign a self-declaration in Annexure A confirming their understanding and commitment to SNEHA’s Code of Conduct. Employees will be required to regularly read and sign this self declaration, as requested from time to time.

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ANNEXURE A: EMPLOYEE / CONSULTANT SELF DECLARATION

SNEHA Code of Conduct

I have reviewed the SNEHA Code of Conduct and understand the terms, conditions and clauses of the code of conduct. I am hereby committed to abide by the clauses mentioned in the code of conduct during my tenure in SNEHA and to those clauses that are applicable even after I have resigned from SNEHA.

Name of the employee/Consultant:

Employee / Consultant code:

Signature:

Date of signing the document:

Date of joining:



SOCIETY FOR NUTRITION, EDUCATION AND HEALTH ACTION