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# Solidarity Fund PL Code of Ethics

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#### 1. Who we are?

Our organisation – the Solidarity Fund PL (SFPL) – was established in 1997 at the initiative of the President of the Republic of Poland who holds an honorary patronage of it.

We are one of the main actors in Polish development cooperation. Our activities are financed from the funds of "Polish Aid" which are at the disposal of the Ministry of Foreign Affairs of the Republic of Poland, from the European Union's funds, as well as funds provided by other domestic and foreign entities.

#### 2. Why did we adopt the Code of Ethics?

The Code of Ethics of the Solidarity Fund PL, hereinafter referred to as the "Code of Ethics" contains a collection of Ten Core Principles that we derive from our mission and values. They determine the standards of conduct and shape our relationships with stakeholders (Partners, contracting parties, Employees, Associates, local communities, and the entire environment that we do or can influence).

These Principles are developed and set out in internal regulations. They contribute to such shaping of our organisational culture that supports social responsibility, reduces the risk of functioning, and strengthens the positive image of the SFPL as a professional organisation operating following the law, development cooperation standards, donors' requirements, and universal ethical principles.

Considering the general nature of the principles contained in the Code of Ethics, the Compliance Team provides additional assistance in doubtful situations requiring additional clarification.

#### 3. Who is the Code of Ethics addressed to?

All members of the SFPL's governing bodies, Employees and Associates at each stage of cooperation, regardless of the form and position they occupy, are obliged to observe the provisions of the Code of Ethics. We undertake actions to promote the provisions of the Code of Ethics in all areas of our operation, in particular under programmes and projects addressed to Partners, Contracting parties, as well as local communities.

## Core Principles of the Code of Ethics of the Solidarity Fund PL

#### I. We respect each person's dignity, and we support equal treatment.

In our activities, all people are treated with respect and dignity. Any form of behaviour that discriminates against people based on gender, religion or belief, social status, skin colour, national or ethnic origin, age, disability, sexual orientation, political views, or any other reason is unacceptable. Any behaviour that shows traits of mobbing, any form of verbal and non-verbal abuse and intimidation, harassment, or violence (including threats of violence) and any form of trafficking in human beings and modern slavery is forbidden.

We particularly aim to protect children in all areas of the SFPL's activity. Any behaviour that might harm children, including physical, sexual, or emotional abuse, harassment, and neglect, is forbidden.

#### II. We support partnership and sustained development.

We respect the autonomy and knowledge of our stakeholders, the Fund's Partners in particular, acting in the spirit of cooperation, mutual trust, and respect, actively involving them in our processes. We support local communities, strive to build long-term relationships, promote the sustained nature of developmental initiatives, and minimise their negative impact on the natural environment. We participate in development cooperation, including humanitarian aid based on international standards of humanity, neutrality, impartiality, and independence.

## III. We ensure professionalism in action.

The SFPL Employees and Associates operate in accordance with the principles of professionalism, impartiality, transparency, and protection of SFPL interests, taking care of its positive image through their attitude. We respect the Employees' and Associates' right to privacy. At the same time, we expect that the actions and attitudes presented outside work will not damage the good name and image of the SFPL. Any actions to the SFPL's detriment are forbidden.

## IV. We promote initiative and engagement.

We support the initiative and professional development of Employees and Associates. We implement an approach based on openness and learning in practice, encouraging our staff to submit their ideas, because every one of us contributes to the fulfilment of the SFPL's goals.

#### V. We build a culture of transparency and protect whistle-blowers.

We want to be certain that no one will be afraid to report information about any problems or irregularities noticed. This is why besides the standard reporting pathways we have provided a safe anonymous notification procedure. Moreover, we do not tolerate any attempts at retaliatory measures against whistle-blowers.

## VI. We ensure safety and security in action.

We conduct activities for people and entities particularly exposed to greater risk. Therefore, our priorities are safety and security, including confidentiality and digital security as well as health and safety at work. We undertake all possible means to protect our Employees, Associates and Partners in SFPL actions.

#### VII. We declare full respect for the law.

The SFPL's Employees and Associates observe the generally binding law as well as local rules and cultural norms, provided that these regulations are not contrary to international legal standards, universal principles of ethics, and fundamental human rights.

## VIII. We do not tolerate corruption.

The SFPL follows the principle of zero tolerance for corruption in any form and in all areas of our operation. We undertake organisational measures and adopt internal regulations that prevent corruption, and we respond resolutely to even the smallest signs of such practices.

## IX. We prevent financial and tax crime.

We counteract money laundering and terrorism financing, and we rule out any cooperation with entities involved in criminal activities or subject to officially recognized domestic and international sanctions.

#### X. We properly manage conflicts of interest.

In the SFPL, we undertake actions preventing or counteracting conflicts of interest that lead to behaviours that are contrary to the law or ethics.

## How do I check whether the given behaviour is appropriate?

In the case of any doubts concerning specific situations or behaviours, answer the following seven questions. If an answer to any of them, even just one, is yes, it may mean that such a situation or behaviour could be incompliant with the Principles of the Code of Ethics.

- 1. Is this action unlawful?
- 2. Is this action contrary to the SFPL's mission and values?
- 3. Does this action violate our internal rules?
- 4. Can such action violate the principles of economy, purpose, and reliability?
- 5. Can such action be perceived as unethical by people around me in particular Partners, Employees, Associates, contracting parties and public opinion?
- 6. Would I feel treated badly or unfairly if someone behaved like this towards me?

If you suspect that a situation, behaviour or action, or lack of it, may violate the Code of Ethics, notify your supervisor, contact a person of trust in the SFPL, or use the possibility of other ways of reporting of violations including the anonymous procedure for whistleblowers.

In case of any doubts, contact your Compliance Team!

## **Document information sheet**

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