



CODE OF CONDUCT

OBJECTIVE AND SCOPE

The Code of Conduct sets the standards for professional and ethical behaviour at Technical Rescue International (TRI) and describes how to raise a concern and what protections you will receive for doing so.

This policy applies to all employees, consultants, interns, volunteers, stakeholders, partners and vendors.

VIOLATING THE CODE OF CONDUCT

Failure to comply with this policy and guidelines may result in disciplinary action up to and including termination of employment, contract or procurement arrangement. The action taken will be commensurate with the seriousness of the conduct and may include civil and criminal proceedings.

FRAUD, BRIBERY AND CORRUPTION

TRI has a zero tolerance approach to dealing with identified cases of fraud, bribery and corruption and will pursue sanctions as well as legal charges if such instances are detected.

- Fraud means acting to mislead in order to gain financial benefit.
- Bribery is the offering, promising, giving, receiving or soliciting anything of value to improperly influence the actions of another party.
- Corruption is the abuse of entrusted power for private gain.

DO:

- Speak up and report any instances of fraud, bribery and corruption in line with the Whistleblowing Policy.
- Attend relevant face-to-face training and complete online modules related to counter- fraud and anti-bribery and corruption.
- Ensure that any grants or any other disbursement of client funds are safeguarded from fraud and bribery risks.

DO NOT:

- Do not offer or accept kickbacks in any circumstances. Do not give facilitation payments.

WHAT TO DO IF YOU SUSPECT FRAUD, BRIBERY OR CORRUPTION.

Inform your line manager, or the TRI Director, or use one of the whistleblowing mechanisms that are publicly displayed in the TRI offices.

GIFTS AND HOSPITALITY

You must not offer or accept any money, gifts or hospitality that could, or could seem to, influence your professional relationship with a client, beneficiary or any other third party.

If you do, you could be charged with gross misconduct. If you offer or accept any gifts or hospitality, you must get approval in advance and disclose it in line with the Gifts & Hospitality Policy – failure to disclose may be considered a disciplinary offence.

WHAT TO DO IF YOU ARE OFFERED MONEY, GIFTS, OR HOSPITALITY.

- Always ask yourself if the gift or hospitality could be seen as a bribe.
- Before offering or accepting any gift or hospitality you should make sure it is in line with the thresholds in the Gifts & Hospitality Policy, customary in a normal relationship, and is unlikely to influence the other party's or your own decision-making.
- Be extra-cautious when the gifts or hospitality involve governments or public officials.

FURTHER ACTION:

- Inform your line manager, or the TRI Director or use one of the whistleblowing mechanisms that are publicly displayed in the TRI offices.

CONFLICT OF INTEREST

TRI's advice must always be objective and independent. You must report any personal or business relationships that could, or could be perceived to, interfere with your objectivity.

DO:

- Avoid actual or perceived conflicts of interest.
- Declare all conflicts of interest to your line manager.

PARTNERS & SUPPLIERS

We choose our partners and suppliers through competitive selection processes, and conduct thorough background checks and due diligence. We work respectfully and honestly with them. We adapt procurement policies and procedures to local context, laws and regulations. Our policies are designed to reduce the risk of TRI becoming associated - through our partners and suppliers - with fraud, bribery, corruption, sanctions, tax evasion, terrorism financing, modern slavery and human trafficking.

DO:

- Consult with the supply chain management department and follow the Procurement Manual when buying goods or services.
- Always treat suppliers with respect, dignity and integrity.
- Look out for potential warning signs that may affect us conducting our business with integrity, such as reputation or an opaque ownership structure.

- Use the Third Party Screening Tool to check whether the third parties we engage appear on any sanctions lists, are subject to adverse media, or involved in terrorism, bribery, fraud or money laundering.

QUALITY, DIVERSITY, DIGNITY AND HUMAN RIGHTS

Our workplace provides an environment of respect for dignity and free from objectionable conduct. This specifically excludes all forms of harassment, which is a disciplinary offence and will normally be treated as gross misconduct. We respect the equality of all those with protected characteristics, including gender, age, race, religion, sexual orientation, marriage status and pregnancy/maternity.

Concerns that these principles are not being respected can be pursued through the Grievance Policy.

We must also ensure that any suppliers that provide goods or services to TRI and any other third parties we work with share our commitment to complying with labour laws and human rights.

DO:

- Always show respect for colleagues and the communities we work in.
- Speak up and raise any instances of harassment or discrimination.

DO NOT:

- Threatening or bullying behaviour will normally be treated as gross misconduct.

HUMAN TRAFFICKING AND MODERN SLAVERY

- Beyond basic compliance, TRI is committed to working with donors and partners to apply best practice through our supply chains and to use our own expertise to help end human trafficking, modern slavery (sex trafficking and compelled labour) and all human rights abuses.
- If you witness any human rights abuse in our operations, you must report it to the TRI Director or through the whistleblowing mechanisms.

SAFEGUARDING

TRI has a safeguarding commitment to prevent and reduce harm to children and vulnerable adults who may be in contact with our staff and consultants. We have a specific Safeguarding Policy in place, as well as a Child Protection policy, which everyone at must adhere to. The TRI Director acts as TRI's Safeguarding Lead, creating a trusted point of contact for staff and consultants and the general public, or anyone outside the organisation, to raise concerns and ensure that any safeguarding matters are investigated and dealt with properly.

DO:

- If you witness any safeguarding breaches in our operations, you must report them to the Safeguarding Lead, or through the whistleblowing provisions.

DO NOT:

- You must not engage in any form of sexual abuse or exploitation of any persons of any age.
- You must not have sexual relations with children (defined as under 18 years old) or with beneficiaries (in exchange for assistance or payment or any other reason) recognising the inherent unequal power dynamics involved.
- You must not exchange money, offers of employment, goods or services for sex or sexual favours, nor any other forms of humiliating, degrading or exploitative behaviour within the course of your engagement with TRI.

DATA PROTECTION AND USE OF IT RESOURCES

We may hold sensitive information on our beneficiaries and staff that must be protected for their safety and security. TRI is subject to strict data rules to protect privacy including the General Data Protection Regulation (GDPR) - that all companies collecting data in the European Union must comply with.

We are responsible for using IT resources in an appropriate and professional manner at all times.

DO:

- Always exercise the highest standards of cyber security when using TRI IT systems.
- TRI assets and resources including but not limited to, laptops, mobile phones, the internet, electronic e-mail, and used systems should be primarily used for official purposes.
- Report any data breaches immediately to IT.

DO NOT:

- Do not keep data longer than necessary.
- Never use our IT systems to engage in illegal or inappropriate behaviour.
- It is strictly prohibited to access, store, or transmit words, images and/or other material that are illegal, sexually explicit, violent or that a reasonable person would find offensive.
- Circulate any inappropriate programmes or e-mails to TRI e-mail distribution lists and/or communications channels.

CONFIDENTIAL AND SENSITIVE INFORMATION

As part of our work, we frequently have access to confidential third-party information. We must never disclose, discuss or copy such information without written authorisation from the third party.

DO:

- If you should receive this kind of information, even inadvertently, you must immediately alert the Chief of Controls.

DO NOT:

- You should never seek to obtain confidential information from clients or competitors - for example, documents marked 'official', or 'sensitive', internal strategies or business plans, bids or bid evaluations, or internal information on pricing and commercial costing information.
- Breach copyright law or licensing agreement when developing any TRI property such as intellectual property, library and reference material or copying other property for TRI use.

ENVIRONMENT

TRI is committed to minimising our environmental footprint by preventing pollution and encouraging practices to promote sustainability. We are working to measure, monitor, and minimise our environmental footprint, and to support improvements to the environment through our projects.

DO:

- Always consider whether a meeting that would require a flight could be adequately conducted via videoconferencing or remote connection.
- Actively consider the environmental footprint of our actions, such as using air-conditioning while windows are open, or leaving heating or lights on when not necessary.
- Only buy supplies when necessary and minimise the amount of materials i.e. stationery, office equipment, furniture consumed.
- Buy products, when available, that are made from recycled material and/or are recyclable, and have minimal packaging.
- Buy energy efficient appliances and equipment

ACCOUNTING AND REPORTING

TRI is registered in the UK. We submit annual financial statements which are audited by an independent accounting firm. The accuracy of the financial statements and reputation of TRI depend on all time and expenses being recorded according to our rules; and information on activities and performance being recorded in a timely and transparent way without misrepresentation or falsification.

DO:

- Ensure you and your teams keep accurate financial records.
- Ensure timely and accurate submission of timesheets.
- Support all expense submissions with receipts.

DO NOT:

- Do not alter, delete or falsify financial records

TAX

Tax evasion, or facilitating tax evasion by staff or associated people or companies, is not tolerated. TRI pays tax in the UK.

DO:

- Raise any concerns of tax compliance issues with the TRI Director.

HEALTHY, SAFE WORKPLACE

We seek to provide an environment that is physically, emotionally and socially safe. We have a moral and legal duty of care for the health, safety and welfare of our staff and the families and others associated with our staff who are in locations where we work around the world. Our work can be stressful and expose us to the worst actions of humanity.

DO:

- Make suggestions for how we can improve the health, safety and welfare of the TRI team.
- Raise concerns if you identify a potential hazard or feel that certain behaviours or practices may cause harm.
- Raise concerns if you feel that you, or a colleague, is affected by stress.

HOW DO I RAISE A CONCERN?

TRI promotes a culture of openness, accountability, and high ethical standards. As part of your duty under the Code of Conduct, you must report suspected or actual violations of our policies, such as fraud, bribery, corruption and human trafficking, modern slavery and safeguarding.

You can report your concern to your manager or to the TRI Director. Or you – and other staff, consultants, suppliers, clients or other stakeholders – can report anonymously through the whistleblowing process displayed in our offices. All reports are investigated, as appropriate, and handled confidentially.

Confidence in the processes, including whistleblowing will be surveyed regularly.

NON-RETALIATION

Retaliation against any colleague who in good faith seeks advice, raises a concern or reports misconduct is strictly prohibited. The fact that an individual has raised a concern in good faith, or has provided information in an investigation, cannot be a basis for denial of benefits, termination, demotion, suspension, threats, harassment or discrimination.

If any individual, regardless of their role in TRI, retaliates against a colleague who has truthfully and in good faith reported a potential violation, TRI will take appropriate action - even if it later turns out that the colleague was mistaken in reporting the matter originally. However, if an individual has intentionally made a false report, TRI will take appropriate action.