

## **Code of Conduct**

### **Minerva Business and Human Rights Association**

#### **Policy and Procedures No. COC01**

##### **1. Introduction**

Business and Human Rights Association (Minerva) is a non-governmental organisation that carries out human rights risk and impact assessment, establishment of human rights compliance mechanisms, policy development, stakeholder engagement and activities to eliminate and compensate for negative human rights impacts that may occur as a result of the activities of businesses within the framework of the United Nations Guiding Principles on Business and Human Rights and related legislation and national laws.

The Minerva Code of Conduct is a framework that describes the behaviour expected from members, employees, business and project partners and all stakeholders to protect human rights, ensure fair and safe working conditions, and provide humanitarian assistance in a responsible manner and in line with high ethical standards.

Minerva Code of Conduct has been prepared in accordance with the charter, values, mission and vision of the organisation.

##### **2. Purpose and Scope**

The Minerva Code of Conduct is intended to be part of the employment contract of all Minerva employees and to be a guiding code of ethics to be followed in projects and business relationships with Minerva.

The Minerva Code of Conduct applies to members of the Board of Directors, employees, agents, representatives, consultants, interns, volunteers and all individuals representing Minerva in and out of office, as well as business and project partners and all relevant stakeholders. These individuals are referred to as "Minerva Stakeholders" in this document.

##### **3. Definitions**

Beneficiary: Natural or legal persons including disadvantaged groups such as children, women, disabled, refugees, etc., who benefit from the projects carried out or contributed to by Minerva.

#### **4. General Principles**

Minerva promotes a corporate culture that is always guided by universal ethical values and principles, including integrity, honesty, respect for human dignity, openness and non-discrimination, with a focus on the five fundamental principles of humanitarian aid: humanity, non-discrimination, impartiality, independence and accountability.

#### **5. Code of Conduct**

##### **5.1. *Working Guided by Humanitarian Principles***

- 5.1.1. *Humanity:*** If there is human suffering, wherever and however it occurs, the most vulnerable should be the first to respond.
- 5.1.2. *Non-discrimination:*** The only consideration when providing humanitarian assistance is needed; no discrimination can be made in aid activities for any reason. It is essential to provide needs-based humanitarian assistance without discrimination based on race, nationality, gender, ethnicity, tribe, age, sexual orientation, disability, religious belief and political opinion.
- 5.1.3. *Neutrality:*** Humanitarian action cannot be conducted by taking sides in any conflict or dispute and all parties are treated equally.
- 5.1.4. *Independence:*** Projects, programmes, activities and interventions are based on needs analyses; therefore, assistance provided to people in need should not be based on political, economic, military and/or personal interests independent of the outputs of the analysis.
- 5.1.5. *Accountability:*** Minerva is individually and collectively accountable to Minerva beneficiaries, staff, donors, partners, individuals and communities of local, national and supranational organisations for all of its actions, activities, decisions and practices.

##### **5.2. *Respecting Human Rights and Acting in Compliance with the Law***

- 5.2.1.** It is essential to respect international human rights, including the fundamental rights guaranteed by the United Nations International Covenant on Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. Human rights must not be violated, even in conflicting circumstances.

- 5.2.2.** It is essential to act in accordance with the domestic law of the country of operation. In addition, if the Minerva Code of Conduct sets higher standards than the laws of the country of operation, the Minerva Code of Conduct shall prevail.

**5.3. *High Ethical Standards***

- 5.3.1.** Any form of violence, including but not limited to physical, emotional, verbal, economic and/or gender-based violence, is not tolerated and unacceptable.
- 5.3.2.** An authority arising from a position in the organisation may not be abused in any way. Abuse of authority includes, but is not limited to, all forms of exploitation, including favouritism, nepotism, cronyism, patronage relationships, corruption, sexual exploitation.
- 5.3.3.** Attitudes and behaviours cannot include any form of harassment, mobbing, bullying, discrimination or racism.
- 5.3.4.** In order to avoid any conflict of interest, all information that could damage Minerva's work and reputation should be shared with Minerva managers. This includes Minerva employees' past professional experience, infectious diseases, other family members and relatives working at Minerva, and relationships with beneficiaries.
- 5.3.5.** No gifts, grants, favours, hospitality, loans, cash or in-kind payments, directly and/or indirectly, should be accepted from any private or legal person without the approval of Minerva managers. Catering and small gifts accepted during meetings and visits in order to comply with social norms are exempt from this rule.

**5.4. *Child Protection Policy***

- 5.4.1.** Minerva Child Safety Policy and Procedures and related codes of conduct must be adopted and fully complied with.
- 5.4.2.** International children's rights and the United Nations Convention on the Rights of the Child must not be violated; violations against them should not be supported or condoned. Child rights violations include, but are not limited to, early marriage, child labour, child trafficking and sexual abuse of children.
- 5.4.3.** By recognising the best interests of the child, the child protection approach should be accepted as an integral part of professional work.

### **5.5. *Gender Equality***

**5.5.1.** Recognising that women, men, girls and boys have different needs and ways of coping with difficulties, these differences should be taken into account when implementing the relevant tasks.

**5.5.2.** Gender equality should be recognised as a fundamental condition for the full realisation of human rights and made an integral part of the work.

### **5.6. *Combating Corruption and Bribery***

**5.6.1.** Commit to preventing all forms of bribery and corruption and enforcing relevant laws.

### **5.7. *Quality and Accountability***

**5.7.1.** Accountability for the consequences of all actions and decisions should be adopted, first and foremost to the community served, but also to financial supporters, governmental organisations, volunteers, employees, members, cooperation partners and the general public.

### **5.8. *Compliance with the law***

**5.8.1.** Respect for the law must be clearly demonstrated in all activities and all relevant legal requirements and obligations must be taken into account in decision-making processes. For decisions where the relevant legal requirements are not fulfilled, the accountability responsibility of the relevant persons is reserved.

## **6. *Community Feedback and Complaint Mechanism***

**6.1.** The Minerva Community Feedback and Grievance Mechanism is in line with the principles of legitimacy, accessibility, predictability, fairness, rights-compliance and transparency. It should be known how to use these mechanisms, and false and malicious accusations should not be made.

**6.2.** The Minerva Feedback and Grievance Mechanism has been established to handle complaints and feedback from Minerva's beneficiary groups and employees, which may or may not be related to Minerva services and/or employees.

## **7. Violation of the Code of Conduct**

- 7.1.** In case of violation of the Code of Conduct, the necessary sanctions will be imposed by the manager or the Disciplinary Board within the framework of the applicable Labour Law and the Minerva association charter and the Code of Conduct and Policies. These sanctions may take the form of verbal warning, written warning or termination of contract. However, sanctions are not limited to these. In relevant cases, civil and criminal sanctions may occur in accordance with the laws of the Republic of Turkey.
- 7.2.** In the event that a violation of any of the Code of Conduct is noticed, witnessed and/or suspected, it is mandatory to notify the immediate supervisor as soon as possible. Failure to report any violation in a timely and/or willful manner will result in disciplinary action.
- 7.3.** In cases where reporting to Minerva managers is not appropriate or possible for any reason, the Minerva stakeholder who is aware of the violation should use the Minerva Feedback and Complaint Mechanism as soon as possible. In such a case, complaints should be sent by e-mail to [team@minervabhr.org](mailto:team@minervabhr.org) via the Complaint and Suggestion Form in Annex 1.

## **8. Declaration of Conformity**

This Code of Conduct, which is an integral part of contracts or agreements, must be understood and agreed upon by the persons concerned. By signing this document, which is a formal declaration of understanding and agreement with the Code of Conduct, a commitment is made to act in accordance with the Code of Conduct.

Any questions raised by signatories regarding various parts of this Code of Conduct or its possible consequences may be raised with the managers. Guidelines, regulations, policies and procedures referenced in this Code of Conduct may be under development or revised.

Recognising the potential consequences of behaviour on and off duty, the Minerva Code of Conduct must be adhered to in all situations and fulfil our responsibility to ensure the highest possible standards of business and human rights.

The final versions of all referenced and/or attached documents must be read, understood and applied in conjunction with the Code of Conduct from the moment they are made available.

## 9. References

The Code of Conduct is complementary to the Minerva Charter. The Code of Conduct is an integral part of any contract or agreement with Minerva Stakeholders.

**Status:** No. COC01 under Minerva Policy and Procedures, Approved.

**Acceptance Date:** March 2023

**Entry into force:** March 2023

**Approved by:** Minerva Board of Directors

## **ANNEX - 1- Suggestion and Complaint Form**

### **MINERVA BUSINESS AND HUMAN RIGHTS ASSOCIATION SUGGESTION and COMPLAINT FORM**

Date:

Subject of Suggestion / Complaint:

Details of Suggestion / Complaint:

Name and Surname of the Staff:

Signature: