

Code of Conduct

(Applicable for Ethiopia)

of "Menschen für Menschen "

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Introduction

"There is no first, second or third world. We all live on one planet, for which we share responsibility." – Karlheinz Böhm

Under the motto of its founder Karlheinz Böhm, the Menschen für Menschen Foundation ("**Menschen für Menschen**") has been providing development support in Ethiopia since 1981. Menschen für Menschen supports people in Ethiopia to develop their living conditions by making them independent of outside support in the long term. Menschen für Menschen's actions are integrated, sustainable and at eye level.

To maintain the high standard of Menschen für Menschen's work, compliance with legal requirements is our baseline expectation. We commit to upholding additional self-imposed guidelines.

Compliance with the regulations is intended to protect all persons who come into contact with Menschen für Menschen. Compliance with the rules also serves to protect Menschen für Menschen itself.

This Code of Conduct provides the framework for all internal guidelines. Further details on the respective topics can be found in the individual policies, to which reference is made at the relevant points.

It should be noted that it is the responsibility of all members of Menschen für Menschen to adhere to the regulations so that the values of Menschen für Menschen can continue to be promoted in the spirit of the founder.

Please read this Code of Conduct thoroughly and let us all act accordingly.

Thank you for your commitment.

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1. Purpose and Scope of the Code of Conduct

Menschen für Menschen is an international non-governmental, non-religious, humanitarian organization that provides help for self-development in rural Ethiopia.

Menschen für Menschen has been engaged in the promotion of sustainable development in Ethiopia since 1981. Menschen für Menschen has implemented 13 of the UN's 17 Sustainable Development Goals in its activities since their introduction in 2015, thus contributing to a balanced global community.

This Code of Conduct shall globally contribute to meeting the highest ethical and legal standards in all areas of Menschen für Menschen's activities.

This Code of Conduct guides us in the right direction to make the right choices. However, it will not answer all questions you might have. As additional sources of information, we established more detailed policies and manuals to complement this Code of Conduct:

- Anti-Bribery and Anti-Corruption Policy
- Human Rights Policy
- Human Resource Policy Manual
- General Data Protection Policy
- Financial and Purchasing Policy & Procedures Manual
- Procurement Procedures Manual
- Lobbying Policy
- Speak-Up Policy
- Case Management Policy
- Risk Management Policy
- Blacklisting Rule Applicable to Contractors & Consultants
- Child Protection Policy

In case of any uncertainties, please contact the compliance officer.

2. Questions, Doubts and Concerns

We are only able to find the best solutions and to prevent misconduct if our employees interact with us. Therefore, if you have any questions or doubts regarding this Code of Conduct, do not hesitate to contact the compliance officer. You will be provided with all the support and information needed to meet your obligations. The same applies if you notice any potential violations of this Code of Conduct.

Confidentiality of your questions, doubts and concerns will be preserved as much as possible. Apart from compliance with this Code of Conduct, our employees also have the obligation to report possible infringements.

Menschen für Menschen is committed to a policy of non-retaliation. Therefore, you do not have to fear negative consequences when reporting allegations, even if you are not absolutely certain about the facts, provided that your report is made in good faith. We do not tolerate threats or acts of retaliation against you for raising your concerns. However, intentionally using the reporting system and this policy for abusive practice (i.e., filing reports in bad faith) is prohibited and may result in disciplinary measures, including, but not limited to, termination of employment.

For further information, please refer to the Case Management Policy.

3. Violation and Consequences

Violations of this Code of Conduct can have severe consequences for Menschen für Menschen and individual employees.

Menschen für Menschen may suffer reputational damage or may be held liable, in particular under civil and criminal law.

Therefore, Menschen für Menschen monitors and audits compliance with this Code of Conduct. We will strictly pursue any violations of this Code of Conduct with disciplinary measures, up to and including termination of employment.

4. General principles of our activities

In all activities, employees should consider and apply the following general principles.

4.1 Acting at eye level

The inviolability of human dignity is the central maxim of our humanitarian approach. This means that we treat every person with equal respect and at eye level.

4.2 Sustainable measures

Our measures are well-founded and durable in order to make the population independent of outside help in the long term. All the materials we use are designed to last even after we are no longer on site.

4.3 Needs and impact-oriented action

We are convinced that problems can only be solved if the solutions are aligned with the actual needs of the population. This is why we always identify the specific needs in consultation with the local population.

4.4 Participative and autonomous measures

To prevent the formation of further dependencies and create the highest possible level of ownership, we involve the local population in our activities. Our aim is for local people to actively participate in the projects, take responsibility and develop their own models that fit into their social structures.

4.5 Integrated and holistic approach

We believe that individual activities alone will not lead to long-term change. We therefore take a holistic approach and implement comprehensive measures in all areas of daily life to improve the living conditions of people in Ethiopia in the long term. A transformation will not only come about by individuals only, but by a community approach.

5. Fundamental Responsibilities

5.1 Protection of Human Rights

We support and respect the internationally recognized Human Rights as stated in the United Nations Global Compact. We do not accept any violations of these rights and will intervene in case of adverse events.

For further information please refer to our ***Human Rights Policy***.

5.2 Compliance with Laws

We act in compliance with national and international laws, regulations and provisions, as well as Menschen für Menschen's policies and other internal manuals. It is the duty of every employee to know and adhere to these.

5.3 Prevention of Sexual Exploitation, Abuse and Harassment (PSEAH)

We are committed to preventing any form of sexual exploitation, abuse, and harassment in line with international standards, including those of the UN IASC. This includes raising awareness, providing training, and ensuring clear, accessible reporting mechanisms for all individuals involved. It is essential that we maintain an environment where all parties are treated with respect and dignity.

In case of any alleged incidents, we ensure that appropriate steps are taken, and we conduct thorough investigations in line with our internal procedures. Allegations will be handled sensitively and impartially, following due process to ensure that all parties are protected from retaliation.

6. Environmental Protection

We consider the need to protect the environment and to mitigate climate change. Therefore, non-renewable resources are used with care and responsibility. We promote operational procedures reducing our environmental footprint.

7. Employment

7.1 Non-discrimination

All our employees will always be treated with respect and dignity. Equal qualification, experience and performance are remunerated equally.

We do not tolerate any discrimination based on political party affiliation, race, skin colour, gender, marital status, pregnancy, religion, political opinion, nationality, ethnical background, social heritage, social status, disability, age, trade union membership, and all other attributes protected by applicable laws.

7.2 Conditions of Employment

Our goal is to provide decent working conditions.

We do not perform forced labour. Our employees may leave Menschen für Menschen within the statutory or contractually agreed time.

Fair and reasonable remuneration is important to us. Our employees receive at least the local minimum in their sector. Working hours correspond to the applicable laws and are reasonable. For high-risk work, suitable work materials are provided to protect the employees. We expect our contractual partners to also comply with these minimum standards.

We do not employ minors under the minimum employment age of 14 years according to Article 2 paragraph 4 of the Minimum Age Convention (No. 138) of the International Labour Organization (ILO)¹.

Our primary interest is to ensure the well-being and to support the personal and professional development of employees.

For further information please refer to our ***Human Resource Policy Manual***.

8. Health and Safety

Meeting the applicable regulations and standards, we ensure our employees' occupational health and safety.

¹ [Convention C138 - Minimum Age Convention, 1973 \(No. 138\) \(ilo.org\)](https://www.ilo.org/conventions/c138)

Additionally, all employees must commit to establishing and maintaining a safe work environment. To avoid risks, safety procedures have to be carried out as required by applicable policy or regulation. Any threats to health and safety must be reported immediately.

9. Confidentiality

Our employees all have the responsibility to keep confidential information safe. They shall in particular not inform any unauthorized person, including family and friends. Confidential information may only be discussed after ensuring that no unauthorized party is able to overhear the conversation.

We respect the intellectual property and confidential information of third parties. Our employees will not use any proprietary or confidential information that they became aware of as a result of their employment, abusively or for their own personal gain.

10. Data Protection

10.1 Personal Data

We highly value data protection, privacy as well as data security. We comply with locally applicable data protection laws as a minimum standard for our business conduct.

Personal data needs to be adequately protected. Therefore, we only collect and process personal data for particular specified business and other legitimate purposes and ensure that it is secured against unauthorized access. In order to prevent unauthorized access, personal data is only transmitted with safety measures in place. When processing sensitive data, conducting internal investigations and/or compliance controls, we adhere to applicable data protection and labour laws as well as to our respective policies.

Please also see and comply with our ***Data Protection Policy***. In case of any uncertainty, please contact the Data Protection Officer.

10.2 Business Information, Data and Documents

Information from Menschen für Menschen needs to be used with integrity. We only work with approved software and hardware and handle passwords carefully. Business information will only be transferred to authorized parties.

Our employees shall choose passwords according to password safety standards and are obliged to change passwords periodically. They must ensure that third parties cannot access information from Menschen für Menschen when leaving their workstation.

10.3 Social Media and Emails

Our employees may post about Menschen für Menschen and its activities when using social media, but they must clearly identify their posts as personal and purely their own. Menschen für Menschen shall not be held liable for any repercussions the employees' content may generate. Dishonourable content such as racial, ethnic, sexual, religious and disability slurs and defamatory statements are not tolerated. Employees' posts shall comply with all applicable intellectual property and data protection laws and shall not contain proprietary or confidential information or personal data relating to Menschen für Menschen, its employees or business partners.

Menschen für Menschen reserves the right to require any employee to edit, amend or delete any dishonourable, misleading, inaccurate, unlawful or otherwise detrimental content relating to Menschen für Menschen and its activities posted on social media by that employee.

Our employees shall communicate via email efficiently, professionally and not for private purposes. Emails shall only be used to the extent necessary.

11. Conflicts of Interest

Conflicts of Interest may arise if any activity, relationship or interest may provoke doubts about one's ability to act objectively and with integrity.

A potential Conflict of Interest arises when employees' personal interests collide or appear to collide with their duties for Menschen für Menschen. This is particularly relevant in situations such as awarding contracts to related parties (e.g. spouses, life partners, friends, acquaintances, siblings or relatives in a direct line) or awarding contracts to companies where related parties hold decision-making positions.

Our employees shall follow objective criteria leaving out any private interests when making decisions concerning Menschen für Menschen. This is essential, as Conflicts of Interest create risks for the reputation of each individual and Menschen für Menschen.

In case of possible Conflicts of Interest, our employees are obliged to alert the respective Country Representative or Director of Administration & Finance or Project Manager immediately. They will help to find a valuable solution.

11.1 Family and Close Friends

Private relations should not influence business. Engaging in business partner relations with family members and close friends of our employees may only proceed after consulting the Executive Board, the Country Representative or Director of Administration & Finance or Project Manager. The decision to enter into and/or pursue the business relationship must be based solely on objective criteria, such as quality and price.

11.2 Self-Contracting

We do not perform self-contracting. Our employees shall not, as representatives of Menschen für Menschen, enter into a contract with themselves or with a third party that is being represented by the same employee without prior written authorization by an authorized Menschen für Menschen representative.

12. Respect of Property of Menschen für Menschen

Our employees must handle our property with responsibility and protect our assets against loss, theft, damage or unauthorized use.

Without explicit permission, Menschen für Menschen's property, including but not limited to, financial funds and office supplies, may not be used for private purposes or removed outside its standard location. If personal use of certain assets, such as mobile devices, is allowed, our employees always have to ensure that these assets are only used as intended and reasonably.

Contrary actions may not only result in disciplinary measures, including but not limited to termination of employment, but also civil proceedings and criminal prosecution.

13. Decisions on the use of Menschen für Menschen's financial resources

Employees of Menschen für Menschen act with the greatest possible care when using Menschen für Menschen's resources.

Employees of Menschen für Menschen allocate the budget of Menschen für Menschen on an annual basis in accordance with the proposed and authorized operational plan. When procuring items for the various projects, all employees take into account the internal control procedure for procurement activities and inventory management.

For further information please refer to our ***Procurement Procedures Manual (applicable in Ethiopia) or the Beschaffungsrichtlinie (applicable for Germany / Europe).***

Menschen für Menschen's cash flows are documented in an accurate manner and handled uniformly by all employees. The employees must record the cash flows in such a way that they can be properly monitored.

For further information please refer to our ***Financial and Purchasing Policy & Procedures Manual (applicable in Ethiopia) or the Beschaffungsrichtlinie (applicable for Germany / Europe).***

14. Anti-Money-Laundering

We fully support international actions against money laundering.

Money is laundered by slipping assets originating from criminal offences into the regular economic circle.

All employees must carefully review payments and cash receipts that appear unusual or are made with cashier's checks or in currencies other than the agreed upon ones. Additionally, all employees must be vigilant regarding payments where the sender or recipient is a third party not named in the relevant contract. The same applies to payments made to accounts that do not correspond to the usual accounts for the business relationship.

In order to prevent money laundering our employees must take special care when any questionable financial transactions are requested by third parties. They must not tolerate or participate in any misuse of Menschen für Menschen for illegal activities.

15. Anti-Corruption

15.1 General Rules

We are committed to combat corruption. Corruption is a major threat as it may lead to criminal penalties and substantial damage of Menschen für Menschen and our employees. Furthermore, it damages the reputation of Menschen für Menschen and its employees. Please note that it can start with small favors and lead to dependency. We point out to all employees that corruption has consequences under labour law and can lead to dismissal in serious cases.

Therefore we do not tolerate corruption. Alleged regional customs do not lift the ban on corruption, even if this means Menschen für Menschen losing business with certain business partners.

Our employees shall never, directly or indirectly, offer, promise, give or demand anything of value in order to obtain business or for any improper advantage. They shall avoid any actions that might lead to the perception of improperly influencing someone's business or being improperly influenced by third-parties due to any kind of advantage granted.

Cash or its equivalents may never be offered, granted, demanded or accepted.

For further information please refer to our ***Anti-Bribery and Anti-Corruption Policy***.

15.2 Facilitation Payments

Facilitation payments are any advantages granted to ensure that a public official fulfills his duties quicker than usual.

Our employees shall apply specific caution when dealing with public officials. Facilitation payments to public officials are forbidden unless all applicable laws allow for the payments.

15.3 Gifts and Invitations

Our employees shall not, directly or indirectly, ask for any kind of benefit, such as favors, gifts or invitations. We also handle giving benefits to third parties very carefully.

For further information please refer to our ***Anti-Bribery and Anti-Corruption Policy***.

16. Lobbying

When taking part in a political discussion, we act transparent and in compliance with applicable laws. We respect and value the independence of our counterpart.

Lobbyists have to disclose their function as a representative for Menschen für Menschen and must publicly declare Menschen für Menschen's interest. They shall take particular care to avoid any impression of causing a violation of duties by a public official.

In order to avoid losing the status as a non-profit foundation, payments to political parties are strictly prohibited.

Third parties conducting lobbying on behalf of Menschen für Menschen are obliged to verify that they comply with this Code of Conduct and the provisions of their agreement with Menschen für Menschen.

Please also see and comply with our ***Lobbying Policy***.

17. Trade Controls and Sanctions

The purpose of international trade control and sanctions is to prevent the supply of certain people, organizations or countries, especially those associated with terrorism or money laundering, with financial resources or specific goods.

In order to support this purpose, Menschen für Menschen and its employees comply with international trade control laws.

18. Speak up

If you are aware of a violation or potential violation of laws, our Code of Conduct or other internal policies, please report these to the internal reporting office of Menschen für Menschen.

For further information please refer to our ***Speak-Up Policy***.