

# The Joint Impact Model (JIM) Foundation's Code of Conduct

## Introduction

Our Code of Conduct is the moral compass for how we operate and behave as individuals, within our team, and as an organization. Regardless of your role, it sets common standards of behavior and provides guidance for making decisions, using judgment, and conducting professional activities. Individually and collectively, we are all responsible for ensuring we behave in the spirit of our Code of Conduct, which is derived from FMO's code of conduct.

The Code of Conduct also serves as an umbrella document for our values, policies, and procedures. The Code applies to all employees and externals of the JIM Foundation.

As an employee or external, you are expected to:

- be aware of and behave according to the Code of Conduct and all JIM policies and procedures;
- act as a role model for others; and
- act (including providing feedback) when the Code of Conduct is breached, or behaviors are not in line with expectations.

If unforeseen situations occur, you should find the best way to act based on your own insights. If advice is required, you may contact your manager or the Compliance Officer.

## Values and Behaviors

JIM Foundation's Values and Related Behaviors:

- *Diversity*: Contribute to an inclusive environment, listen actively, and leverage the strengths of others.
- *Integrity*: Adhere to laws and policies, speak up when concerned, and commit to decisions.
- *Making a Difference*: Collaborate to maximize impact and consider stakeholder perspectives.
- *Quality*: Communicate expectations clearly, seek feedback, and continuously improve.

## Diversity

JIM Foundation values diversity as it offers a range of perspectives leading to better decision-

making. We maintain a respectful work environment and do not tolerate discrimination, harassment, or bullying.

## Integrity

Integrity is essential to maintaining the reputation of JIM Foundation. You are expected to fulfill your role with integrity and consider the interests of clients, colleagues, and stakeholders.

Key integrity guidelines:

- Comply with laws and never assist in illegal activities.
- Refrain from unethical business practices.
- Act appropriately in all professional settings.

## Making a Difference

JIM Foundation aims to create impact for stakeholders, aligned with its goals and mission.

## Quality

JIM Foundation encourages professionalism and continuous development in all interactions with stakeholders.

## Sexual Exploitation, Abuse, and Harassment (SEAH)

JIM Foundation has a zero-tolerance policy towards all forms of Sexual Exploitation, Abuse, and Harassment (SEAH). Every individual working with or for JIM Foundation is entitled to an environment free from exploitation, abuse, and harassment, and must ensure their actions uphold the highest standards of ethical behavior.

Key Definitions:

- Sexual Exploitation: Any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes, including profiting monetarily, socially, or politically from the exploitation of another.
- Sexual Abuse: The actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
- Sexual Harassment: Unwanted conduct of a sexual nature that violates the dignity of an individual or creates an intimidating, hostile, degrading, or offensive environment.

Responsibilities of Employees and Externals:

- Maintain professional behavior: Employees, volunteers, and partners must refrain from any form of sexual exploitation, abuse, or harassment in the workplace or while representing JIM Foundation.
- Prohibited Conduct: Engaging in or facilitating SEAH is strictly prohibited. This includes but is not limited to, using professional authority or influence to coerce or solicit sexual favors, inappropriate sexual behavior, and any form of sexual violence.
- Protection of Vulnerable Groups: In line with our mission to make a positive impact, special care must be taken to avoid exploitation or abuse of vulnerable groups,

particularly children and marginalized communities. JIM Foundation forbids engaging in any sexual activity with persons under the age of 18, regardless of the legal age of consent in the country where the work is taking place.

#### Reporting and Addressing SEAH:

- **Duty to Report:** Any incidents or suspicions of SEAH must be reported immediately, whether the behavior is observed in the workplace or during interactions with external stakeholders or beneficiaries.
- **Confidentiality and Protection:** JIM Foundation is committed to handling all reports of SEAH with the utmost confidentiality and will protect individuals who report such incidents from retaliation or reprisal.
- **Investigations:** All allegations of SEAH will be promptly investigated in accordance with our internal policies. Disciplinary action, including dismissal and legal proceedings, will be taken against anyone found guilty of SEAH.
- **Commitment to a Safe Environment:** JIM Foundation is committed to creating a safe and respectful environment for all. SEAH will not be tolerated, and we expect everyone involved with the Foundation to contribute to a culture of respect, dignity, and accountability.

#### Unacceptable Use of ICT Systems

The following are unacceptable uses of ICT systems:

- inappropriate use of communication devices, including, but not limited to, supporting illegal activities, and procuring or transmitting material that violates the JIM Foundation's policies against harassment or the safeguarding of confidential or proprietary information, such as - but not limited to - sending, downloading, storing or installing illegal software via torrent sites or otherwise, hacking activities and gambling online;
- visiting internet sites, sending e-mails, or publishing messages on the internet which are considered to be pornographic, racist, derogatory, discriminatory, threatening, offensive, sexually harassing, or otherwise contrary to the law and/or incite hate and/or violence;
- sending Spam or malicious software via e-mail, text messages, pages, instant messages, voice mail, or other forms of electronic communication which jeopardizes the security of the JIM Foundation.
- soliciting or campaigning for commercial ventures, religious or political causes, or for personal gain using the JIM Foundation's contacts.
- forging, misrepresenting, obscuring, suppressing, or replacing a user identity on any electronic communication to mislead the recipient about the sender;
- using the JIM Foundation's e-mail to engage in conduct that violates the JIM Foundation's policies, guidelines, or local laws;

- lack of good judgment, leading to misrepresentation or exceeding authority in representing the opinion of the company. Sending or posting information that is defamatory to the company, its products/services, colleagues, and/or customers is strictly prohibited;
- using the ICT systems including electronic mail and instant messaging platforms to communicate sexual or other harassment. Include words or phrases that may be construed as derogatory based on race, color, sex, age, disability, national origin, or any other category;
- making attempts to negate or circumvent security controls, policies, and procedures (e.g., disabling virus protection, VPN, or tunneling a protocol through a firewall), including the use of software/hardware tools that compromise security (e.g., password crackers and network sniffers);
- theft of company resources including sensitive information such as client or employee data.

## Confidentiality and Transparency

All sensitive information must be treated confidentially, in keeping with the provisions of the GDPR. Transparent communication is encouraged, but confidentiality must always be respected when handling business and personal information.

## Private Investment Transactions

Avoid conflicts of interest related to personal investments. JIM Foundation expects employees to act with integrity in personal financial dealings.

## Anti-Bribery, Corruption and Fraud

No bribery or corruption is tolerated. Avoid situations where personal interests conflict with those of the foundation. The JIM Foundation has a zero tolerance for fraud. You are expected to always act honestly and with integrity

## Gifts, Entertainment, and Hospitality

Business decisions should not be influenced by personal gifts or entertainment. Always maintain the interests of JIM Foundation without creating dependencies through gifts. Any gift above EUR 50 must be disclosed, and on a case-by-case basis may need to be given to the foundation.

## Outside Positions

Disclose any outside positions that may create a conflict of interest. Get approval from your manager before accepting such positions.

## Career moves to partners or clients

In general, the JIM Foundation supports, but does not actively encourage, career moves of its employees towards clients or partners. Due to the potential conflict of interest during the

orientation and transition period towards the future employer, such a process should be as transparent as possible.

## Personal Relationships at Work

If personal relationships exist or develop at work, disclose them to maintain transparency.

## Incident Reporting

The JIM Foundation encourages its employees and third parties to report wrongdoings and/or suspected wrongdoings so that the JIM Foundation is aware of, can deal with, and prevent issues, including the ability to draw lessons learned and improve business procedures.

Wrongdoings include, but are not limited to:

- a criminal offence has been committed (or deliberately concealed), is being committed or is likely to be committed: e.g. fraud, corruption, theft, money laundering, market abuse, insider trading,
- a person has breached, is breaching, or is suspected to breach laws or regulations, JIM Foundation's internal rules and regulations or core values,
- providing incorrect information or withholding, destroying, or manipulating information (regarding the wrongdoing), or
- acute danger (to the environment), where a compelling and urgent social interest requires immediate reporting.

Disclosures may be made via email to the executive director of the JIM Foundation at [AlexM@jointimpactmodel.org](mailto:AlexM@jointimpactmodel.org) or to the head of operations and engagement at [LaiaNQ@jointimpactmodel.org](mailto:LaiaNQ@jointimpactmodel.org). These disclosures may be made anonymously. Under no circumstances will any form of reprisal be tolerated against an employee or third party reporting an incident.