



Code of Conduct for Recipients of Grants Policy

1. Introduction

Options Consultancy Services Limited and its subsidiaries and branches (collectively, **Options**) expects recipients of grants from Options (**Grantees**) to share its ethical business principles, as set out in this Code, and to promote these principles to their sub-contractors and Grantees. A Grantee's approach to these principles is an important factor in Options' selection and evaluation process, and acceptance of the Code is a pre-requisite in Options' awards of grants to these parties.

Options reserves the right to verify compliance with this Code by asking Grantees to provide relevant information and also by conducting audits and reviews. Where breaches of the Code are identified and/or persist, Options will consider termination of the grant agreement with the Grantee concerned.

2. Business integrity

- **Compliance with laws and regulations**

Grantees will comply with all relevant laws, regulations, standards in the countries in which they operate. They will abide by applicable international trade (including import and export/reexport controls) and economic laws and regulations, including tax, and hold all licences necessary to operate their business. Where the applicable laws and Code address the same subject and are not in conflict, the highest standard will apply. Should any Code requirement conflict with applicable laws, the highest standards consistent with applicable local laws will apply.

- **Anti-corruption**

Grantees shall not take any action to violate, or cause their sub-contractors and Grantees to violate, applicable anti-bribery laws. They shall not engage in or tolerate any form of corruption, bribery, extortion or embezzlement. In particular, they must not promise, offer, authorise, give or accept anything of value, either directly or indirectly through intermediaries, in order to obtain or retain a business or other advantage from a third party, whether public or private.

- **Conflict of interests**

Grantees must avoid conflicts of interest. They shall not enter into a relationship with an Options' director, employee or contractor which could lead such trustee, director, employee or contractor that/those individual(s) to make a decision that would not be in Options' best interest. All organisations and individuals with which Options works are expected to disclose to Options any situation that may appear as a conflict of interest, including any situation where a person working for Options, or any close relation of such

person, has an interest in the Grantee's business or any kind of economic tie with the Grantee. Where possible, Options will seek to mitigate the effect of any conflict with any Grantee.

- **Political contributions and lobbying**

Grantees are not authorised to make any type of political contribution or charitable donations on behalf of Options. They are not authorised to undertake any type of lobbying or other similar representative efforts on behalf of Options before any kind of government entity, official, body or representative without the express, written consent of Options.

- **Protection of third-party rights, confidential information and privacy**

Grantees must safeguard and make only appropriate use of confidential information of Options and of their own beneficiaries. They shall also ensure that valid intellectual property rights are protected. Grantees must manage personal data in line with applicable laws relating to data privacy and protection.

- **Anti-money laundering and anti-terrorism**

Grantees must comply with the financial crime, anti-money laundering and anti-terrorism laws in all jurisdictions where they carry out their business activities. Grantees shall not accept, facilitate or support money laundering. They shall conduct business only with reputable parties that are engaged in legitimate business activities, with funds derived from legitimate sources.

Grantees must not accept funds known to be derived from illegal activities or engage in any business or other arrangement with any party that is or may be involved with, or supports, terrorism. Grantees shall not have dealings with any party that is on any terrorist list as defined by the US or UK government, or UN, or any party that is subject to international economic sanctions.

3. Safeguarding, human rights and working conditions

- **Safeguarding**

Grantees must commit to safeguarding children, vulnerable adults and staff. They must ensure that:

- Safeguarding children is enacted through minimising the risk of intentional or unintentional harm, abuse and exploitation of children within their operations; and responding appropriately if harm and abuse occurs.
- Safeguarding vulnerable adult is enacted through protecting the safety and well-being of all adults and providing additional measures to protect those least able to defend themselves from harm or abuse.

- Safeguarding staff is enacted through avoiding ambiguous workplace situations and behaviours, which may be misinterpreted and potentially lead to false allegations against them.

Grantees are expected to have robust policies for safeguarding children and vulnerable adults in place and to commit to Options' Child and Vulnerable Adult Safeguarding Policy (a copy of which is available on request). Where Options has reviewed a Grantee's safeguarding policy and advised the Grantee that it is compliant the Grantee's safeguarding policy will then apply. Grantees are expected to disclose to Options any situation (witnessed, suspected or alleged) that would breach Options' Child and Vulnerable Adult Safeguarding Policy, the Grantee's own safeguarding policy (if applicable) or this Code. Grantees are obligated to report any cases of child or vulnerable adult abuse or exploitation by a member of staff or anyone associated with or acting on behalf of the Grantee. They are also obligated to report child or vulnerable adult abuse or exploitation within the community by someone outside their organisation.

- **Modern slavery, human trafficking and forced labour**

Grantees shall prohibit any use of forced, bonded, indentured labour or involuntary prison labour. All work shall be voluntary, and workers shall be free to leave work or terminate their employment with reasonable notice. They shall not impose a requirement on workers that they must hand over government issued identification, passports or work permits as a condition of employment.

- **Child labour**

Grantees shall prohibit all forms of child labour in their organisations and supply chains. Grantees must not employ children below the minimum age of employment or the age for completing compulsory education in the applicable country, whichever is the higher. Grantees must not employ any workers under the age of 18 to perform work that is likely to be hazardous or harmful to health and safety.

- **Non-discrimination**

Grantees shall not practice any form of discrimination in any employment practices such as access to training, promotions/rewards on the grounds of race, colour, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

- **Fair treatment**

Grantees shall create and maintain an environment that treats all workers with dignity and respect. They shall not use any physical abuse, verbal abuse, or sexual or other harassment, or the threat of any of the aforesaid. No harsh or inhumane treatment, coercion or corporal punishment of any kind, or the threat of any of the aforesaid, shall be tolerated.

- **Wages and benefits**

Grantees must pay all workers at least the minimum wage required by applicable laws and regulations and provide all legally mandated benefits.

- **Working hours**

Working hours, including overtime hours, shall comply with all applicable laws or recognised industry standards in the country in which the individual is engaged and works.

- **Health and safety**

Grantees shall provide a safe and hygienic working environment for workers. Adequate steps shall be taken to prevent accidents and injury to health arising out of workplace hazards. Where Grantees provide housing to workers, it shall be clean and safe, and meet the living and safety conditions standard to the country and area.

4. Environmental responsibility

Grantees shall comply with applicable environmental legislation and international standards, including obtaining all required environmental permits and registrations that apply to their business activities. If environmental legislation is not evident or enforced, Grantees shall adopt responsible practices for managing and, wherever possible, reducing their environmental impact, including optimising the consumption of natural resources and minimising the release of harmful discharges to the environment.

5. Commitment

Grantees are encouraged to fulfil the expectations set out in this Code by allocating appropriate resources.

- **Monitoring system**

Grantees shall have adequate systems and controls in place to ensure compliance with these standards or equivalent standards. Grantees' systems and controls shall also apply to any sub-contractors or Grantees they work with in connection with the grant.

- **Consequences in case of violations**

Grantees shall address any violations of these standards or equivalent standards that come to their knowledge and take appropriate action. Depending on the severity of the violation, appropriate action could be a request by Options for corrective measures, disciplinary actions, or termination of the grant agreement with the relevant party.

- **Reporting**

Grantees are required to promptly report any suspected or known violations of this Code. More information about how to report and to whom is available on Options' main website at www.options.co.uk. Alternatively, the concerns can be directed in confidence via email to speakingup@safecall.co.uk. Options will not tolerate retaliation against any

person who raises or tries to raise a concern. A person who makes a good faith report about potential misconduct who experiences retaliation or other adverse action for raising a concern should report this immediately via the channels identified above. All Grantees who work on DFID financed programmes may report suspicions or allegations of aid diversion, fraud, money laundering or counter terrorism finance via Dfid's Internal Audit Investigations Section (IAIS) to reportingconcerns@dfid.gov.uk. If a Grantee does decide to report directly to DFID Options would ask that the concerns are discussed with it prior to such reporting.