

CC CHANGE COMMUNICATIONS



"Communication for Change, Change for Development"

Association Reg. N° 000933/ADR/J06/BAPP

CODE OF ETHICS

AND

WORK CONDUCT

Enhancing Probity in Our Work Practices

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ABOUT OUR ORGANIZATION

The name of our organization is Change Communications. It was created in Cameroon in 2010 as a non-state and not-for-profit media facility for development.

Mission of Change Communications: *Communication for Change, Change for Development*

Our mission is to induce change of attitudes, practices and behaviors as means of strengthening and supporting individuals, groups and communities to collectively achieve sustainable development by themselves and for themselves.

Our Credo: Upholding Equity and Integrity.



INTRODUCTION

In application of the Resolutions taken at the end of the General Assembly held in Yaoundé on May, 2019 demanding the Management Committee of Change Communications to update the *Code of Ethics and Work Conduct*, (CEWC or The CODE), and after conducting a series of consultations with relevant stakeholders, and after holding staff meetings to work out details, we now lay out our updated CEWCP which summarises the responsibilities of all Change Communications staff, Management Committee Members and Members of the General Assembly to adhere to and uphold Change Communications' position on fraud, bribery and corruption. The CODE is divided in two main sections as follows:

Section I on Work Conduct lays out the values and principles that guides our work and recommits *Change Communications* to high ethical standards, transparency and accountability in our dealings with all internal and external stakeholders, personnel, beneficiaries, funding and cooperating partners, contractors or suppliers. Our core values are therefore deep rooted in honesty, integrity, truthfulness, respect for others, responsibility inclusion, equality, equity, reliability, and respect of the law. These values underscore our ethical commitment and serve as compass in all our undertakings in the conduct of our work.

Section II on Bribery and Corruption restates Change Communications' policy of zero-tolerance for fraud, bribery and corruption in any form and spells out ways by which defaulters could be punished.

The prescriptions contained in this CODE apply to all those who work for *Change Communications* as permanent or temporary staff, and those who engage with *Change Communication* directly or indirectly for the realization of its objectives.

Change Communications is committed to the implementation of this CODE and to ensuring all staff, and General Assembly Members understand its content, and their individual and collective responsibilities therein prescribed.



SECTION I: WORK CONDUCT



1. GENERAL PRESCRIPTIONS

1.1: For the staff

All *Change Communications* staff bears a responsibility in general as follows:

- To be impartial and honest in all affairs relating to their job
- To be of good faith and do nothing to destroy the trust necessary to stay on job
- To adhere to this Code in their professional, as well as personal conduct, treat everyone with respect, honesty and fairness.
- To adhere to our commitment to fairness and reaching our goals solely through ethical conduct in order to build and consolidate credibility and trust from our partners/stakeholders, and to achieve our objectives only on the basis of hard and properly conducted work
- To ensure the application of our values and norms throughout entire work processes
- To understand that, non-compliance to this Code considered as misconduct will warrant disciplinary action, including termination of employment or other contract in deserving cases.
- To cooperate fully in investigations of potential or alleged misconduct.
- To understand that *Change Communications* is open to any questions at any time and will not allow punishment or retaliation against anyone for reporting misconduct in good faith.

1.2 For the management staff

The management staffs of *Change Communications* have higher responsibility:

- To demonstrate the importance of this Code through their actions
- To promptly address every ethical question or concern raised or arising
- To demonstrate ethical governance by example

1.3: For the others including partners

- All those who engage with *Change Communications* in various capacities contractors, consultants, temporal workers and volunteers are obligated to abide to the prescriptions of this CODE

1.4: Ethical Decision-making

All the staff of *Change Communications* and its stakeholders in taking any decision that directly or indirectly involves or affects our organization should ensure that:

- The decision reflects our values and ethics
- The decision will lead to action that is legal
- The decision complies with the CODE and our rules/policies
- The decision respects the rights of others



- The decision does not misrepresent information or deviate from normal procedure

1.5. Compliance with laws and regulations

Our commitment to integrity entails that we:

- Respect laws and regulations in force, including the Labour Code of Cameroon at all times and must ensure compliant operations.
- Comply with the legal requirements and work practices as a lawful organization
- Adhere to every valid and binding contractual agreement that we conclude, and we do not abuse our rights

2.0: CONFLICT OF INTERESTS

We consider that, a "conflict of interest" occurs when the personal interest of a staff interferes or potentially interferes with the best interests of *Change Communications*.

Consequently:

- Our decisions shall be based on objective and fair assessments avoiding the possibility of any improper influence and void of a personal interest, financial interest or potential personal gain in any transaction by *Change Communications*
- If co-workers become involved in personal relations with each other, the onus is on the senior employee concerned to bring this to the attention of his or her manager to confirm that there is no conflict of interest, nor will a conflict of interest arise.

3.0: FAIR LABOUR PRACTICES AND WORKING CONDITIONS

Change Communications is:

- Committed to promote equality in our employment practices and to fair employment and remuneration policy in compliance with the laws in force
- Firmly opposed to employ or contract child or slave labour or any form of forced or compulsory or bonded labour.
- Opposed to all forms of illegal, unfair, unethical labour practice that exploits workforce, such as child labour and the practice that destroys social security.
- Determined to ensure that, its staff shall act with integrity and treat their colleagues and others through the work with full respect.





4.0: DISCRIMINATION AND HARASSMENT

- We provide equal opportunity in employment
- We do not tolerate any discrimination or harassment or any type of abuse.
- No overt or covert discrimination act shall take place based on any professionally non-relevant trait or circumstance, like gender, marital status, age, national or social or ethnic origin, colour, religion and political opinion, disability, property, birth or other status.
- Any kind of discriminatory behaviour, harassment, bullying or victimization is prohibited.
- All members of our team are expected to follow the highest standards of conduct in all verbal and written communication based on mutual respect, and must refrain from any form of harassment, slander or any behaviour that could be taken as offensive, intimidating, humiliating, malicious or insulting.

5.0: HUMAN RIGHTS

- We are committed to respect human dignity and rights of each individual and community whom we interact with during our of work.
- We shall not, in any way, cause or contribute to the violation of human rights.
- Our staff shall treat everybody with dignity, respect and care and uphold human rights.

6.0: HEALTH, SAFETY AND ENVIRONMENT

Change Communications is committed to fostering a workplace that prioritizes health and safety of both its staff and the environment in which they work:

- We provide clean, safe and healthy work conditions and we are dedicated to maintaining a healthy environment.
- We are committed to minimise the impact of our activities on the natural environment
- All staff must follow and comply with every relevant health, safety and environmental protection laws, regulations and rules at all time

7.0: SECURITY, PROTECTION AND PROPER USE OF COMPANY ASSETS

- We are responsible for the security, protection and for the economic use of our organization's resources.
- Our resources, including time, material, equipment and information are provided for legitimate work use only.
- Occasional personal use is permissible as long as it is lawful, does not disrupt job performance or affect the morale of other workers.

- All staff is obliged to follow appropriate security measures and they should treat organization's property, whether material or intangible, with respect and shouldn't misuse company assets or use it carelessly.

8.0: INFORMATION SECURITY

By information security, we mean all that relates to: (i) the protection of confidentiality, privacy, and personal data protection, (ii) restricted access entity information and personal identifying information (PII), (iii) respect for principle of minimum access to information, (iv) proprietary information and intellectual property rights, and non-disclosure instructions" (NDI), In this regard, we:

- shall provide proper technical security measures for our information
- ensure the confidentiality, integrity and accessibility of organization's information as well as guarding against unlawful or inappropriate access by others
- shall refrain from sharing any proprietary information, that is, all non-public information that might be harmful to the Change Communications and/or her partners if disclosed to unauthorised parties.
- respect the property rights of others.
- shall refrain from disclosing non-public personal information, financial statements and financial data concerning partners of Change Communications, their transactions and any related information, any communications including recorded conversations in connection with the provision of services and all fund-related policies and procedures shall be deemed confidential.
- refrain from sharing Information and making public comments about business entities, (service providers, goods suppliers, contractors and other business dealing with Change Communication shall be limited in access and dissemination, and public comment about the business entities and contents of the transaction(s) with Change Communications
- shall refrain from sharing information that can distinguish or trace an individual's identity, including their name, social security number, driver's license, fingerprints, biometric records
- shall not acquire or seek to acquire trade secrets or other proprietary or confidential information by improper means
- shall not engage in unauthorized use, copying, distribution or alteration of software or other protected intellectual property rights



- ensure that information related to allegations of fraud or corruption is published for public access only after due investigation and authorization

9.0: BOOKKEEPING, TRUE REPORTING AND FINANCIAL INTEGRITY

- Our books, records, accounts and financial statements shall be maintained in appropriate detail, must truly and properly reflect our transactions.
- We condemn all forms of money laundering, and will only accept funds from sources that are legitimate
- We commit ourselves to proper financial transaction practices and will under no circumstance get involved in practices that are “fake” in any way such as failing to issue receipts or issuing fake expense invoices
- All staff must follow accounting procedures, ensure that business transactions are recorded and documented appropriately and make certain that all disclosures made in financial reports are full, honest, accurate, timely and understandable., (*See our Accounting Policy and Procedure*)
- All staff must not improperly influence, manipulate or mislead any audit

The prescriptions of this CODE OF ETHICS AND WORK CONDUCT obligate *Change Communications* staff to conduct work the right way based on a culture of ethics and compliance.

In all, we are bound by this CODE to always act lawfully, ethically and in the best interest of CHANGE COMMUNICATIONS, knowing fully well that, if we do not, we are liable to administrative and penal sanctions as the case may be.



SECTION II : ANTI-FRAUD, BRIBERY AND CORRUPTION POLICY



1.0: UNDERSTANDING KEY CONCEPTS

The key concepts in this Section II are fraud, bribery and corruption.

1.1: Fraud:

Change Communications considers fraud to mean, the act or intent to cheat, steal, deceive or lie for personal gain at the detriment of the organization. It is both unethical and, in most cases, criminal.

1.2: Bribery

Bribery should be understood as the offering, promising, giving, accepting or soliciting of money, gifts or other advantages in exchange for doing something illegal or breaching the trust of *Change Communications*.

1.3: Corruption:

By corruption we mean the abuse of entrusted power or influence for private gain.

Corruption, bribery and fraud are all considered unethical practices and totally prohibited in *Change Communications*.

2.0: DEALING WITH FRAUD, BRIBERY, CORRUPTION

We consider fraud, bribery and corruption as ills that can destroy the credibility of *Change Communication* as an organization, its management and personnel in the eyes of partners, and even threaten its existence. We are therefore committed to combating each of the three ills.

2.1: Dealing with Fraud:

Fraud in every form is totally prohibited. *Change Communications* will consider the following practices or instances as fraud requiring immediate investigation for consequent measures to be taken:

- theft of supplies and equipment
- improper use of official stamp
- use of monies identified for specific programme activities for unrelated programmes
- a false or excessive claim for expenses or allowance
- payment of salary or wages to a fictitious worker
- false work attendance record or timesheet
- payment for work not performed
- making or use of forged credentials and endorsements
- altering amounts and details on documents
- overcharging;



- unauthorised transactions
- selling information
- altering donations, stocks and assets records
- cheques made out to false persons including false persons on the payroll
- unrecorded transactions
- transactions (expenditure/receipts/ deposits) recorded for incorrect sums
- substituting new goods for old
- manipulation of the procurement process, including undisclosed conflict of interest
- not recording donations wholly or partially
- make or use false official identification, including false email identification
- damaging or destroying documentation
- not disclosing all documentation
- using copies of records and receipts
- false invoicing, including using imaging and desktop publishing technology to produce
- apparent original invoices charging incorrect accounts in order to misappropriate funds
- running a private business with official assets
- inappropriate or unapproved use of computer generated signatures
- downloading of confidential information and/or source codes and forwarding this to an unauthorised party
- presentation of false documentation or statements about personal past experience, education or certificates/diploma
- inappropriate use of assets for personal purpose
- use of information for personal gain or advantage

Change Communications declares a zero-tolerance stance on the foregoing fraudulent practices or instances and will deal with promptly in accordance with the internal disciplinary measures of our organization, and as the case may be, through referrals to relevant state institutions.

2.2: Bribery and corruption

- We firmly condemn and do not tolerate any form of bribery corruption.
- It is prohibited to directly or indirectly offer, promise, give, ask, solicit or accept any unfair advantage or benefit, in order to obtain, retain or facilitate a transaction in a way that gives *Change Communications* an unfair advantage or benefit which may include cash, any cash equivalent gift, credit, discount, travel, personal advantage, accommodation or services.



- We do not permit facilitation (“brown envelope”) payments to government officials, private business, organizations, institutions or individuals in order to secure or speed up routine actions for *Change Communications*.
- We do not tolerate influence-payments or fee for any person, moral or physical as a go-between to improperly influence a decision-maker or whoever in order to obtain undue favour, gain or advantage for our organization
- Similarly accepting or allowing another person to accept a bribe is considered gross misconduct on the part of our staff

2.3: Gifts and hospitality

We shall avoid:

- Any actions that create a perception that favourable treatment was sought, received or given in exchange for personal benefits
- Any courtesies or benefits including gifts in kind or cash, gratuities, meals, refreshments, entertainment or other advantage from physical or moral persons with whom we do or may do business
- Accepting any benefits that constitute, or could reasonably be perceived as constituting, unfair inducements that would violate law, regulation or polices, or would cause embarrassment
- Acceptance of offers, receiving or offering kickbacks or bribes for a preferential treatment

All other gifts must be politely refused or returned to the donor. If return is not possible it shall be offered for charity or community purposes.

3.0: ANTI-BRIBERY AND CORRUPTION MEASURES

Change Communications in accordance with best risk management practice, acknowledges that, strong internal prevention mechanisms and controls at all managerial levels are needed to prevent fraud, bribery and corruption. In this regard, it is committed to preventing and controlling fraud, bribery and corruption through the in the following measures:

3.1: Pre-emptive Measures

Change Communications shall make this CODE available in its entirety to the public through online and conventional media, as well as in-person means.

Change Communications adopts fraud, bribery and corruption risk assessment of all its operations as a policy



Change communications shall during recruitment obligate of staff, temporal workers and volunteers to submit a written and signed anti-fraud, bribery and corruption commitment as part of the recruitment process.

Change Communications shall always communicate its anti-fraud, bribery and corruption policies to agents, intermediaries, contractors, suppliers and other third parties making clear that, we will not tolerate fraudulent or corrupt activities, and the giving or receiving of bribes.

Before entering into contracting arrangements with any party, *Change Communications* shall always assess the risk involved and undertake appropriate due diligence

Change Communications shall always reiterate its zero-tolerance policy in any transaction, and incorporate appropriate anti-fraud, bribery and corruption clauses into partnership agreements and written contracts.

3.2: Watch out for areas

Change Communications recognizes the fact, certain transactions or areas of transactions may carry higher risk of fraud, bribery and corruption. Special attention needs to be paid to such areas. In this regard, *Change Communications* shall pay particular attention to the following:

- **Procurement:** The process can be a high-risk area for bribery
- **Direct purchases:** Where goods have to be purchased directly on the market and in cash, the likelihood of fraudulent practices is high
- **Partner selection processes:** Partnership contracts and agreements are also slippery areas for bribery and corruption.
- **Monitoring and support processes:** The processes involved also present risks.
- **Hiring and paying for contract services:** when third parties are involved in such payments, the probability for corruption becomes high.
- **Recruitment:** Bribes can be offered or sought in recruitment processes.
- **Cultural context:** In certain culture and work environments, giving and receiving bribes is considered as acceptable practice.

3.3: Whistleblowing and the protection of whistleblowers

Whistleblowing is intended to mean, the sounding of an alarm by a person in-house or external to express concerns about or to attempt to reveal unethical conduct or practice in the activities or operations of *Change Communications*. We also refer to whistleblowing as wrongdoing reporting.

3.3.1: Wrongdoing Reporting

If someone suspects that fraud, bribery or corruption is, has, or is likely to take place, they must at the earliest opportunity report the matter via the line manager and/or the *Change Communications* Whistleblowing Policy.

Deterring anyone from reporting suspicions of fraud or corruption or witnessing such acts in an investigation is will be considered a serious breach of Change Communications' Code of Conduct and may result in disciplinary measures

3.3.2: Protection of whistleblowers

Expressing concerns or denouncing concerns about wrong doing before is to be done through channels that are not open to the public.

No public statement or comment in relation to an alleged fraudulent or corrupt practice may be made to the media except by Change Communications' specifically appointed or authorised representative.

Change Communications is committed to protecting any whistle blower.

3.3.3: Recovery Measures

Change Communications will seek to recover any losses resulting from fraudulent or corrupt activity using all means at its disposal, including civil or criminal legal action.

In case of fraudulent or corrupt practices by cooperating partners, contractors or suppliers, appropriate recovery measures will be taken in accordance with this Policy and the relevant contractual arrangements.

4.0: DISCIPLINARY SANCTIONS

Violations of this anti-fraud, bribery and corruption policy perpetrated by its personnel, and perpetrated against *Change Communications* by cooperating partners, contractors or suppliers and any such parties shall be dealt with swiftly and appropriately in accordance with *Change Communications'* Disciplinary Procedure and may result in disciplinary and penal actions including termination of employment. *Change Communications* reserves the right as the case may be, to report any suspected criminal activity to the relevant legal authorities.

5.0: APPLICABILITY

- This policy applies to all regular, contractual and volunteer staff of *Change Communications*

6.0: REPORTING

- Management Committee will report annually to the General Assembly of *Change Communications* on the implementation of this policy.

Shifu Ngalla


