

# Code of Ethics & Conduct

Effective as of: 01.06.2025

Version 1.0

## 1. Purpose and scope

This Code of Ethics and Conduct (“Code”) sets out ethical and conduct standards reflecting our commitment to integrity, professionalism, transparency, and the responsible use of position and resources in advancing human capital and critical infrastructure development of Ukraine and other countries and territories where MWH operates or will operate.

This Code applies to all individuals engaged by NGO Mykolaiv Water Hub (“MWH”) - including members, employees, volunteers, consultants, contractors, and other representatives (“Personnel”) - across its operations in Germany, Ukraine and other countries.

## 2. Core values and ethical principles

- **Integrity and transparency.** We act with honesty and open in all our operations, communications, and financial practices. We manage donor and partner funds responsibly and transparently to maintain trust and serve our mission.
- **Accountability and stewardship.** We are accountable to our stakeholders, including donors, partners, and the communities we serve. We uphold our commitments and ensure the responsible use of resources to maximize impact and long-term value.
- **Respect, inclusion, and human dignity.** We treat all individuals with respect and dignity, promoting an inclusive environment free from discrimination based on gender, age, ability, religion, ethnicity, or socio-economic background.
- **Impartiality and political neutrality.** We avoid favoritism, bias, or political influence in service delivery, hiring, and concluding partnerships.
- **Sustainability, responsibility, and organizational learning.** We are committed to long-term benefit and environmental responsibility. We continuously learn, document, and share knowledge within the organization to strengthen our practices and foster sustainable growth.
- **Legal compliance and ethical conduct.** We comply with all applicable laws, regulations, and contractual obligations in every country where we operate. Our actions reflect the highest ethical standards, and we work proactively to prevent misconduct and ensure responsible governance.

### **3. Conflicts of interest**

Personnel must avoid situations where personal interests conflict with organizational duties. All potential conflicts must be disclosed to the Management of MWH or via [Ethics Hotline](#) as soon as possible and practical.

### **4. Disclose any outside activities**

Personnel may not engage in external employment or consulting that competes with or detracts from their responsibilities to the MWH without written approval of a supervisor.

### **5. Intellectual property**

All rights to any work or intellectual property created by Personnel in the course of their official duties belong to MWH unless the MWH authorises otherwise.

### **6. Duty of care and safeguarding**

Personnel must follow all health, safety, and safeguarding protocols of respective partners.

Personnel working with children or vulnerable adults must complete safeguarding training and background checks.

### **7. Professional conduct – on and off duty**

Personnel are expected to uphold the high standards of professionalism, both during work hours and in their personal conduct when representing the MWH or attending work-related events.

This includes maintaining respectful, non-disruptive behavior in social settings where Personnel, partners, or beneficiaries may be present.

### **8. Dress code and personal appearance**

Personnel are expected to dress in an appropriate and professional manner when working or representing the MWH in public settings.

This applies to both online and in-person engagements, including interactions with colleagues, program participants, partners, donors, and other stakeholders.

The following guidelines apply:

- Clothing must be modest and appropriate to local cultural expectations.
- Visible designer logos or luxury-branded fashion items are discouraged.
- When provided, uniforms or branded MWH's gear must be worn correctly and professionally.
- In field settings, personnel should avoid excessive use of perfume, jewelry, or makeup.

- Dress choices should prioritize safety, functionality, and cultural awareness, especially when entering homes, religious sites, or government institutions.

## **9. Workplace behavior and culture**

Personnel must maintain a respectful, inclusive, and safe work environment. Harassment, bullying, discrimination, or any form of misconduct will not be tolerated. Personal relationships must not interfere with team dynamics or organizational performance.

All incidents involving misconduct, abuse, or exploitation must be reported through Management of MWH.

## **10. Use of alcohol and prohibited substances**

MWH is committed to maintaining a safe, healthy, and productive work environment. Personnel is expected to act responsibly and professionally at all times.

The consumption of alcohol in the workplace or during work-related activities (e.g. conferences) is strictly prohibited unless expressly authorized by Management for sanctioned events. Even in such cases, Personnel is expected to consume alcohol responsibly.

Excessive use of alcohol - whether during or outside of working hours - that impairs Personnel's judgment, performance, or behavior, or compromises the safety or well-being of others, will not be tolerated and may result in disciplinary action, up to and including termination.

Personnel is also strictly prohibited from reporting to work or performing duties while under the influence of alcohol or any substance that may impair their ability to perform their job safely and effectively.

## **11. Social media and public representation**

Personnel are representatives of the MWH on and off duty. The following guidelines apply to all social media activity:

- Personal opinions should be clearly identified as such and not presented as the views of the MWH.
- Confidential or sensitive information must never be shared on social media.
- Avoid political, religious, or controversial commentary while identifying as a MWH Personnel member.
- Do not post images or content featuring project beneficiaries without explicit written consent.
- Any photos taken during events should portray individuals respectfully and with dignity.
- Use of official hashtags, and MWH logos must be consistent with the official branding.

## 12. Use of resources and assets

Personnel must protect and use organizational resources and assets responsibly, and only for work-related activities.

Misuse of assets, equipment, or digital infrastructure may lead to disciplinary action.

## 13. Responsible financial conduct

Personnel must uphold the highest standards of financial integrity and accountability. Specifically:

- **Strategic use of funds:** all expenditures shall be planned and executed with a view toward their long-term effectiveness and contribution to the organization's mission and objectives.
- **Sustainability-oriented planning:** projects and initiatives funded by the organization shall be designed to create lasting positive change rather than short-term or superficial results.
- **Avoidance of waste:** the organization shall take care to avoid wasteful, short-sighted, or purely cosmetic use of resources (including funding), and will prioritize initiatives that yield enduring outcomes.

All financial transactions must be accurately documented, reported, and used solely for legitimate organizational purposes.

Personnel must not:

- Use MWH funds for personal use or gain.
- Falsify invoices, receipts, or records.
- Engage in any activity that compromises the financial integrity of the organization.

All expenditures must be pre-approved by the designated supervisor or finance officer and documented according to internal procedures. MWH funds must be used strictly for activities aligned with the organization's mission and project objectives.

Personnel must comply with the financial terms of donor agreements, as well as all applicable laws and regulations. Project funds must be tracked and allocated according to approved budgets and subject to independent reviews.

## 14. Gifts and hospitality

Gifts must not exceed €50 (or local currency equivalent). Cash or equivalents (e.g., gift cards) are strictly prohibited. Hospitality must be modest, infrequent, and in line with local customs.

## **15. Anti-corruption and anti-bribery**

The MWH adheres to a zero-tolerance policy on bribery and corruption. Personnel must not:

- Offer, solicit, or accept bribes, kickbacks, or improper personal benefits under any circumstances.
- Make or authorize facilitation payments to speed up routine procedures or secure preferential treatment.
- Engage in any form of corrupt practice, including misuse of influence or position for personal or third-party gain.

Training on anti-corruption is mandatory for all Personnel, especially those in procurement, finance, or field management roles.

Suspected incidents of bribery or corruption must be reported through official channels.

## **16. Anti-money laundering and counter-terrorism financing (AML/CTF)**

The MWH is committed to preventing the misuse of its resources for money laundering or terrorism financing. Personnel must ensure that all financial transactions are transparent, properly documented, and used only for legitimate purposes.

Engaging with sanctioned individuals or entities, conducting undocumented cash transactions, or concealing the origin of funds is strictly prohibited.

Management and personnel involved in finance, procurement, or partner cooperation must complete AML/CTF awareness training.

## **17. Data protection**

Personnel must handle all personal, programmatic, and operational data with the utmost confidentiality and in line with applicable data protection laws in the countries of incorporation and operations.

Personnel may only collect, access, use, store, or share data for legitimate organizational purposes and must ensure that data is accurate, securely stored, and not retained longer than necessary.

Sensitive information (such as details about health, identity etc) must be treated with heightened care, and never shared externally without explicit consent and legal justification.

Personnel must never store personal or sensitive data on unencrypted devices or share access credentials with unauthorized persons.

Data must not be shared with external parties without formal authorization and a signed data protection agreement or memorandum of understanding (MoU) outlining responsibilities.

Personnel are obligated to report any suspected data breaches, losses, or unauthorized disclosures immediately to the Management of MWH.

Failure to report such incidents or deliberate mishandling of data may result in disciplinary action.

## **18. Confidentiality**

Personnel may not disclose confidential information to anyone internal or external to the MWH who is not authorised to receive such information, including members of their immediate family.

## **19. Reporting and enforcement**

Violations of this Code of Conduct may lead to disciplinary measures, up to and including termination of employment or consultancy contract, legal action, or exclusion from future engagement with the organization.

All forms of misconduct, including breaches of MWH's values, ethical standards, legal or regulatory obligations, must be reported.

Reports can be submitted either anonymously or openly through the [Ethics Hotline](#) or by email at [ethics@mykolaivwaterhub.com](mailto:ethics@mykolaivwaterhub.com). Reports and all information will be handled with strict confidentiality.

Retaliation against any individual who reports concerns in good faith is strictly prohibited and may result in disciplinary action.

## **20. Acknowledgment**

All Personnel must sign the Code of Ethics Acknowledgment Form (Annex A) upon onboarding and review it annually.

### **Annexes (for internal use only)**

**Annex A: Code of Ethics and Conduct Acknowledgment Form**

**Annex B: Consent Form for Use of Photographic Materials**

**Annex C: Social Media Policy in Detail**

**Annex A: Code of Ethics & Conduct acknowledgment form**

I, the undersigned, hereby acknowledge that I have received, read, and understand the **Code of Ethics & Conduct of NGO Mykolaiv Water Hub (“MWH”)**. I agree to adhere to the values, principles, and guidelines outlined in the Code.

I understand that this Code applies to all Personnel and representatives of MWH across its operations in Germany, Ukraine, or other countries of activities. I also acknowledge that failure to comply with the provisions of the Code may result in disciplinary actions, up to and including termination of employment or legal action.

Furthermore, I acknowledge my responsibilities regarding:

- **Conflict of interest:** disclosing any potential conflicts of interest and obtaining approval for external activities.
- **Financial integrity:** managing MWH’s resources and financial transactions in a transparent and responsible manner.
- **Professional conduct and behavior:** upholding professional and respectful conduct at all times, especially in public and on social media.
- **Compliance with legal and ethical standards:** adhering to provisions on anti-corruption, anti-bribery, anti-money laundering, and other compliance matters outlined in the Code.
- **Data protection:** ensuring the confidentiality and security of personal and sensitive data, in line with relevant laws and organizational policies.
- **Reporting misconduct:** understanding the channels available to report violations of the Code, including the option to report anonymously, and that retaliation against whistleblowers is strictly prohibited.

I also understand that I am required to review this Code annually and that I will receive training, where applicable, to support my compliance with the set standards.

**Personal Information (for record-keeping):**

- **Full Name:** \_\_\_\_\_
- **Position/Role:** \_\_\_\_\_
- **Signature:** \_\_\_\_\_
- **Date of Acknowledgment:** \_\_\_\_\_

**For Internal Use Only:**

- **Received By (Manager/Supervisor):** \_\_\_\_\_
- **Date Received:** \_\_\_\_\_



**Annex B: Consent Form for use of photographic and video materials**

NGO Mykolaiv Water Hub (MWH) intends to use photographic and video materials featuring its Personnel and program participants on its official website, social media platforms (such as Facebook, Instagram, LinkedIn), and other communication channels including communication channels of its partners. The purpose of using these images is to raise awareness and promote projects and activities of the MWH and its partners.

- I hereby give my voluntary consent to MWH to take and use photographs and/or videos in which I appear for the purposes stated above.
- I understand that these images may be published digitally on the organization's website, social media accounts, newsletters, and may also be used in printed materials related to the organization's work.
- I acknowledge that this consent is given voluntarily, and I may revoke it at any time without providing a reason.

This consent can be revoked at any time by sending an email to [ethics@mykolaivwaterhub.com](mailto:ethics@mykolaivwaterhub.com). Upon receipt of such revocation, MWH will take reasonable steps to remove my images from future publications and platforms, recognizing that content already distributed may not be fully retractable.

**Name, Surname:**

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Name, Surname of a  
parent/legal guardian (if under 18):

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**Date, Place of signing:**

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**Signature:**

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