SNV Code of Conduct

INTRODUCTION	
OUR VALUES	2
OUR COMMITMENT	3
OUR STANDARDS OF CONDUCT	5
ADHERENCE TO SNV POLICIES	7
ADHERENCE TO THE CODE	8

INTRODUCTION

SNV is dedicated to a society in which all people enjoy the freedom to pursue their own sustainable development. We contribute to this by strengthening the capacity of local organisations. We help to alleviate poverty by focusing on increasing people's income and employment opportunities in specific productive sectors (water and sanitation; agriculture, and renewable energy), as well as improving their access to basic services. In doing so, we are 'Connecting People's Capacities' - focusing on the empowerment of local people and organisations in the fight against poverty.

This code applies to everyone working for SNV including SNV's Managing Board, Executive Director and Supervisory Board. The code provides guidelines for good conduct and for the exercise of good judgment in ethical matters and in situations of conflict of interest. The code furthermore states SNV's commitment to the good governance of the organisation. The code is binding, along with the employee's applicable CLA or working agreement, personnel handbook, relevant national laws and contract of employment.

OUR VALUES

SNV's work centres on capacity building and poverty alleviation, which essentially is about working with people and relationships with people. SNV has three sets of corporate values which are reflected in our daily work:

<u>Trust and Respect</u> define the quality of the interface between our partners/clients and us. We wish to be treated with respect and this is also how we should relate to others. Trust also means to be trusted and to be reliable. SNV must be known for being trustworthy and as reliable partner.

Equity and Equality are interlinked: SNV cannot achieve good quality in its work if underlying problems of inequity are not addressed. The good quality of our results has a positive effect on capacity development of partners and clients and indirectly on poverty alleviation. Equity has to do with the core of SNV's goal of reducing poverty and social injustice / power imbalances.

<u>Diversity and People Centeredness</u> reflects the fact that our work with partners/clients is about people working with people. Diversity as a core value means that we recognise and value the great diversity of clients. Diversity within SNV is reflected in its multi-cultural character and in presenting its diverse nature as an explicit strength of the organisation.

Our values are translated into 5 core characteristics, symbolically represented by the **web**, the **heart**, the **question mark**, the **fish**, and the **exclamation mark**. These characteristics help make explicit the link between SNV's corporate values, mission and expected behaviours towards clients, partners and colleagues. The characteristics are described in detail in the "SNV Core Characteristics & Effective Behaviour, 2008" document.

OUR COMMITMENT

To Integrity

At SNV we believe in acting with integrity: being truthful in all of our activities, being honest and respectful to all whom we deal with, and having and following strong moral principles.

To Transparency and Accountability

At SNV we strive for transparency and accountability in our daily work and actions. The manner in which SNV conducts business is open and transparent. The results of our business practices, both good and bad, our successes, failures, problems and victories all are communicated to relevant internal and external stakeholders. We take responsibility for our work.

To Impact and Results

SNV aims to develop practical solutions that address poverty, represent real value for money and achieve sustainable results. SNV is committed to continually improving our interventions. In order to do so, SNV follows the *Management for Results (MfR)* standards which serve the purposes of *steering* - to actually achieve results; *accountability* - to justify our interventions and investments; *learning* - to improve our theory and practice; and *profiling* - to promote our capacity development results in order to mobilise further resources and thus further extend our impact.

To Responsible Business

SNV uses all resources available to meet its mission and achieve lasting impact. We are committed to responsible business practices and will therefore only accept funds and donations from sources whose business practices are in line with our moral principles and values. Special attention is given to ensuring that proper due diligence is carried out before engaging with third parties and specific guidelines on this can be found in SNV's PRM Policy.

To Responsible Finance

SNV believes in practicing responsible finance. As a member of the Netherlands Platform for Microfinance (NPM), SNV has signed the Principles for Investors in Inclusive Finance (PIIF). These principles provide a framework for responsible investment in inclusive finance, focusing on expanding access to affordable and responsible financial products and services for poor and vulnerable populations.

To Legal Compliance

SNV strives to be compliant to relevant local and international laws, rules and regulations. Internal SNV policies should be consistent with these laws and regulations.

To Sustainability

"Sustainable development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs."

World Commission on Environment and Development (1987)

SNV's ultimate goal is to alleviate poverty, striving to do so in a socially - and environmentally sustainable way.

Social Sustainability

Social sustainability refers to the respect of human rights, social inclusion and social equity. It refers to a stable society in which groups of people are connected, cooperate for mutual benefit and have equal rights. SNV is fully committed to carrying out its mission of poverty alleviation and achieving long-term impact in a socially sustainable manner.

Environmental Sustainability

As an organisation we aim to have as little impact on the environment as possible. Long-term environmental sustainability objectives are set based on analysis and aim to both raise awareness of sustainable behaviour in our day-to-day business and reduce our environmental impact.

To Transparency in Financial Systems

SNV has a well-balanced system of external and internal audits in place. Audits at SNV are compliant with applicable regulations and provide a systematic and disciplined approach to evaluate and improve the effectiveness of the organisation's risk management, control, and governance processes.

To Equal Opportunity Employment

Employment at SNV is based solely upon individual merit and qualifications directly related to professional competence. In our HR policies and practices including recruitment and promotions, we refrain from unlawful discrimination or harassment of any kind, including discrimination or harassment on the basis of race, colour, religion, ethnic origin, pregnancy status, sex, gender identity or expression, age, marital status, mental or physical disability, medical condition, or sexual orientation. SNV strives for its employees, at every level, to cooperate in maintaining a climate of common respect for personal dignity, honour and reputation. SNV shall do its best to prevent attitudes that can be considered as offensive, discriminatory or abusive.

To Equitable Compensation

It is one of SNV's objectives to provide its staff with suitable compensation packages and following equity principles for all staffing groups. SNV strives to provide a clear, transparent, and solid compensation structure in order to attract and retain employees.

To Personnel Development and Knowledge Sharing

SNV aims to create an inspiring working environment where people are guided and coached to grow and thrive in their area of expertise. SNV commits itself to fostering learning, personal development and knowledge sharing through collaboration. We support employees' professional and personal development efforts, as we believe this will not only lead to higher qualified employees, but will also enhance the quality of the organisation and it's processes and programmes, increasing our impact in the fight against poverty.

OUR STANDARDS OF CONDUCT

All SNV personnel shall adhere to the below standards of conduct, abide by the law and behave in a proper manner within and outside of office hours.

Workplace Etiquette

- You should treat your colleagues and other individuals with courtesy and respect.
 Harassment, physical or verbal abuse will not be tolerated and you should at all
 times avoid behaviour in the workplace that, although not rising to the level of
 harassment or abuse, may nonetheless create an atmosphere of hostility or
 intimidation.
- In your daily activities you will avoid any behaviour that may reflect negatively on SNV.
- You should refrain from (mis)using alcohol and/or drugs during working hours, or having these in your possession at the workplace.
- Smoking is not permitted in either SNV premises or vehicles. Smoking is only allowed in designated smoking areas.
- You will respect and be sensitive to cultural differences of individuals you deal with in your daily activities.
- You will be impartial at all times and will not deceive or knowingly mislead your superiors, subordinates, colleagues or stakeholders. Moreover, you will do nothing which compromises or is likely to compromise the neutrality of others who work for, or on behalf of, SNV.
- You will take immediate action whenever you discover any behaviour or actions
 by others which conflicts with this code or the law. Should this involve SNV
 personnel, you will immediately report this to your manager, Regional Director or
 confidential counselor following the appropriate policy or guidelines, for example,
 SNV's fraud response policy or whistleblower procedure.

Disclosure of Confidential Information

You have a responsibility to protect the security of any confidential information
provided to, or generated by, SNV. You will not pass on any information that has
come to your attention during or in connection with your duties and of which
confidentiality is appropriate to outsiders, without prior authorisation. This
includes sensitive information related to SNV (business) matters, disclosure of
which can reasonably be suspected to harm the organisation.

Nepotism, Conflict of Interest & Misuse of Power

- You will not misuse or abuse your position or power, or any information acquired
 or derived in the course of your duties, to pursue private interests or those of
 your family, friends, or associates.
- You shall not misuse or abuse your position or power towards others under any circumstance, including matters of psychological, sexual or physical intimidation or harassment.
- Your official conduct and performance of your duties should always be professional and objective and not be influenced by personal relationships or considerations.

- You shall not accept nor give gifts, gratuities or other personal compensation in return for services rendered if the interest of the individual or SNV can be questioned. The acceptance or provision of gifts should be made transparent and communicated to your immediate superior/manager.
- You shall not accept general gifts, gratuities or any personal compensation in return for services rendered which exceed a commercial value of 20 EUR or higher.
- You will not make use of bribery, coercion or threats of any kind, either for personal or professional purposes, under any circumstance.
- Where personal relationships occur between SNV staff members, such
 relationships are expected not to interfere with their working relationships and
 daily activities. The staff involved is expected to notify their immediate
 superior/manager of the relationship, following which the manager may
 determine, at their own discretion, whether any action, such as relocation to a
 different working team, is necessary. Any such disclosure will be treated
 sensitively and in strict confidence.

(Social) Media Guidelines

 You should not, without authorization, provide information to the media and/or publish or make public statements related to SNV policies or activities on behalf of SNV.

General principles of the code of conduct in terms of responsible behaviour also apply to communicating via social media. Examples of well-known social media platforms include Facebook, Twitter, and LinkedIn. Other websites where one can publicly discuss subjects or comment also fall under these guidelines.

- SNV's intranet is intended for internal use and as such, information shared and provided via intranet should be used for internal SNV purposes only.
- Be aware that everything you write or receive on a (social media) website is public and permanent; even if you have separate social media accounts for your personal life, keep your profession in mind.
- Using social media for work is allowed, but it should only be used in a positive, constructive sense.
- Be careful when sharing messages which could be interpreted negatively. A
 wrong statement can have major consequences. Be aware of the potential impact
 on SNV when sharing messages related to: political statements, confidential
 information or using harsh wording, amongst others.
- You will verify sources before sharing or re-posting messages from others, especially in the case of re-tweets on Twitter.
- All messages posted via social media and other websites are the responsibility of the account owner.

ADHERENCE TO SNV POLICIES

Adherence to all active SNV policies is assumed in this code. The below paragraphs refer to individual policies which are actively applied within SNV. SNV's policies and processes are under continuous improvement. They are regularly enhanced and adjusted as needed and are adapted to meet current regulations and legislation. The latest version of the policies and documents described below are (or will be) available on SNV's intranet.

Fraud Response Policy

7

SNV has a zero-tolerance attitude regarding to fraud. SNV's fraud response policy provides guidelines to the employees of SNV if confronted with suspected fraudulent activities. The policy states the responsibilities of everybody involved when dealing with suspected fraudulent activity within SNV. In case of suspected fraudulent activities SNV will act swiftly, intervene if necessary, capitalise on lessons learned and improve the organisation with the knowledge gained through its interventions.

Whistleblower Procedure

SNV has a Whistleblower Procedure. This procedure provides employees with the opportunity to report suspected irregularities of a general, operational and financial nature in such a way that the employee stays protected and will not suffer negative treatment as a result.

Security Policy

SNV's Corporate Security Framework describes behavioral guidelines for staying safe in all countries where SNV works. The framework indicates the means of transportation available in each country, as well as protocols and procedures for their use, safe travel, procedures to follow in case of car accidents and car hijacking, what to do in case of emergencies, and provides advice on travel preparation for a safe journey.

Health Policy

Being a socially responsible employer SNV understands that employee wellbeing is vital for a healthy and effective workforce - which in turn is vital to our long-term success. Our work in an international environment can mean increased risk of burnout and other stress-related illnesses, avian influenza, malaria, dengue, HIV/AIDS and many more common infectious diseases worldwide. The performance of our employees depends on their wellbeing and this policy is therefore intended for all employees. SNV is currently drawing up a global health policy reflecting this understanding and approach. A corporate sick leave procedure and a workplace HIV/AIDs policy are already in place.

Travel Policy

SNV's travel policy highlights the rules and regulations applicable for all work-related travel in all scenarios - e.g. in combination of or as part of a private trip, for recruitment purposes, or for field visits, among others. This travel policy is currently applicable to all head-office employees and head-office related travel funded by SNV. A corporate travel policy applicable to all SNV staff is to be drawn up in 2011.

Business Expense Policy

The business expense policy provides clarity and transparency on reimbursable expenditure made by staff whilst carrying out their SNV duties. Many different items are included in the policy, including food and drink, travel and other purchases. The current business expense policy is applicable to all Head Office personnel. A corporate policy will be drawn up in the near future.

Procurement Policy

The Procurement Policy is designed to promote transparency in approaching vendors and therefore encouraging sound market competition. It is continuously enhanced to comply with national and EU regulations and legislation. SNV's commitment to sustainability and social responsibility is embedded throughout the Procurement Policy.

Child Protection Policy

SNV is committed to the protection of children and does not allow nor approve of child labour, abuse or mistreatment of any kind. To adhere to this principle and in order to provide more specific guidelines for all individuals employed by SNV, the organisation will create and put in place a child protection policy in the near future.

Harassment Procedure

Harassment in the workplace is taken seriously by SNV and is not tolerated. As a responsible employer the organisation aims to prevent harassment in all its forms, including sexual harassment, discrimination, aggression and violence, as well as bullying and any other intimidating, humiliating or threatening behaviour. SNV's harassment procedure highlights how such undesirable behaviour will be dealt with by both the employer representatives – such as line managers –and employees.

ADHERENCE TO THE CODE

This code plays an important role in our daily business and in the broader context of our corporate strategy. It provides the frame of reference for SNV as an organisation and applies to all individuals working for SNV.

This code of conduct is to be seen as a leading document. Any additional guidelines for specific country or regional contexts should be added in a separate document, such as a local personnel handbook. The content of local additions may not conflict or amend the guidelines laid out in this code of conduct.

The code will be specifically highlighted to new staff and is part of the contract of employment. All SNV employees are expected to observe this code and any person breaching the code will be addressed with the possibility of disciplinary measures being taken. Disciplinary action shall be applied at the discretion of the immediate supervisor/manager. Should this involve more than a verbal or written warning, either the Country Director, Regional Director or Chief Executive will be involved in the decision-making process to prevent differential treatment.

The code is not a static document and will be reviewed regularly to react to new developments and requirements, and improved in light of satisfaction surveys, audit results or evaluations. Incident reporting of violations of this code of conduct will be undertaken at regular intervals.