



CS-SUNN

Civil Society-Scaling Up Nutrition In Nigeria

CODE OF ETHICS AND CONDUCT POLICY



ACKNOWLEDGEMENT

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AUTHORIZATION

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INTRODUCTION

The Civil Society Scaling-Up Nutrition in Nigeria (CS-SUNN) is a non-governmental, non-political, non-partisan, non-religious, non-tribal, non-racial and non-profit making alliance, made up of organizations with a shared vision to transform Nigeria into a country where every citizen has food and is nutrition secured. CS-SUNN pursue this lofty goal by engaging government and non-state actors to raise awareness, sustain commitment and actions to effectively tackle under-nutrition in Nigeria. The Alliance is fully committed to the principles of excellence, honesty, accountability, commitment, ownership, recognition and professionalism in the delivery of her mandate. All members and staff are expected to conduct the businesses of CS-SUNN, such as applications for services, procurement or staff recruitment, in an open, fair and impartial manner.

CS-SUNN has thus made for herself the following policy to guide the conduct of her staff and representatives and ensure appropriate ethical standards are followed in her work environment, particularly in relationships between staff and in staff/representatives' interactions with non-staff.

CS-SUNN made this policy pursuant to Sections 34(1), 36(1) & (2), and 42(1) of the Constitution of the Federal Republic of Nigeria (1999) (as amended), and the Companies and Allied Matters Act, Cap. C20 Laws of the Federation of Nigeria, 2004; CS-SUNN Constitution (as amended) 2021; CS-SUNN Governing Board Manual and relevant Legislations as indicated in the provisions of this policy.

CS-SUNN shall apply the provisions of this Policy in all cases regarding the conduct of her staff and representatives as defined in this Policy.



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SECTION
ONE



1.0 INTRODUCTION

1.1. This Code of Conduct sets out the basic standard of conduct expected of all staff and the Alliance policy on matters like acceptance of advantages and declaration of conflict of interest by members, officials and staff in connection with their official duties. This Code also applies to contractors engaged by the Alliance.



SECTION TWO



2.0 ACCEPTANCE OF ADVANTAGE

2.1. It is the policy of CS-SUNN to prohibit all staff from soliciting any advantage from any persons having business dealings with the Alliance (e.g. clients, suppliers, contractors). Staff who wish to accept any advantage from such persons should seek special permission from the Steering Committee Chairman in case of a management staff or the Executive Secretary in case of non-management staff prior to the acceptance.

2.2. All gifts offered voluntarily to the staff and members in their official capacity are regarded as gifts to the Alliance and they should not be accepted without permission. Staff/member should decline the offer if the acceptance could affect their objectivity in conducting the Alliance's business or induce them to act against the interest of CS-SUNN or lead to complaints of bias or impropriety.

2.3. For gifts which are presented to staff in their official capacity and of nominal value (below NGN5000), the refusal of which could be seen as unsociable or impolite (e.g. a plaque presented to a staff member during a seminar in which he is invited to be the guest speaker), the Steering Committee should give permission for the staff to accept these gifts. In other circumstances, the staff should apply in writing to the Steering Committee or Executive Secretary, as the case may be, for permission to accept the gift(s). Each application should be carefully considered by the Steering Committee or Executive Secretary. Proper records of these applications should be kept showing the name of the applicant, the occasion of the offer, the nature and estimated value of the gift, and whether permission has been granted for the applicant to retain the gift or other directions have been given to dispose of the gift. Possible ways of disposal of such gifts are listed in Appendix 2.

2.4. There is however no restriction on the acceptance of advantages, in the staff's or member's private capacity, from any person who does not have any official dealings with the Alliance. In case of doubt, the staff/member should refer the matter to the Chairman, Steering Committee for advice and instruction.



SECTION
THREE



3.0 . CONFLICT OF INTEREST

3.1. A conflict of interest situation arises when the “private interests” of the staff/member compete or conflict with the interests of the Alliance. “Private interests” means both the financial and personal interests of the staff or those of their connections including:

- a). family and other relations;
- b). personal friends;
- c). the clubs and societies to which they belong; and⁴
- d). any person to whom they owe a favour or are obligated in any way.

3.2. Staff/member should avoid using their official position or any information made available to them in the course of their duties to benefit themselves, their relations or any other persons with whom they have personal or social ties. They should avoid putting themselves in a position that may lead to an actual or perceived conflict of interest with the Alliance. Failure to avoid or declare any conflict of interest may give rise to criticism of favoritism abuse of authority or even allegations of corruption. In particular, staff involved in the procurement process should declare conflict of interest if they are closely related to or have beneficial interest in any company which is being considered for selection as the Alliance's supplier of goods or services. Appendix 3 provides some examples of conflict of interest situations which may be encountered by staff/member.

3.3. When called upon to deal with matters of the Alliance for which there is an actual or perceived conflict of interest, the staff or member should make a declaration in writing to his/her supervisor or the Executive Secretary (in case of a member). S/he should then abstain from dealing with the matter in question or follow the instruction of his/her supervisor or the Executive Secretary who may reassign the task to another staff/member.



SECTION FOUR



4.0 . ENTERTAINMENT

“Entertainment” refers to food or drink provided for immediate consumption on the occasion, and any other entertainment provided at the same time. Although entertainment is an acceptable form of business and social behaviour and is not an “advantage”, staff must not accept lavish or frequent entertainment from persons with whom the Alliance has official dealings (e.g. suppliers or contractors), so that they will not be placed in a position of obligation to the offeror.



SECTION
FIVE



5.0 MISUSE OF OFFICIAL POSITION

5.1. A member or staff of the Alliance who misuse his/her official position for personal gains or to favour their relatives or friends are liable to disciplinary action or even prosecution. Examples of misuse include a staff or member responsible for the selection of suppliers giving undue favour or leaking tender information to his relative's company with a view to awarding the contract to the latter.



SECTION
SIX



6.0 HANDLING OF CLASSIFIED OR PROPRIETARY INFORMATION

6.1. Member/Staff are not allowed to disclose any classified or proprietary information to anybody without authorization. Member/Staff who have access to or are in control of such information should at all times provide adequate safeguards to prevent its abuse or misuse. Examples of misuse include disclosure of information in return for monetary rewards or use of information for personal interest. It should also be noted that unauthorized disclosure of any personal data may result in a breach of the Nigeria Data Protection Regulation 2019.



SECTION
SEVEN



7.0 PROPERTY OF THE ALLIANCE

7.1. Member/Staff given access to any property of the Alliance should ensure that it is properly used for the purpose of conducting the Alliance's business. Misappropriation of the Alliance's property for personal use or resale is strictly prohibited.



SECTION
EIGHT

8.0 GAMBLING

8.1. Member/Staff must not engage in gambling with persons who have business dealings with CS-SUNN as well as among colleagues, particularly with subordinates. If on social occasions where refusal of gambling is considered unsociable, the amount of money involved should not be significant (less than NGN5000). Gambling in CS-SUNN premises is strictly forbidden.



SECTION
NINE

9.0 OUTSIDE EMPLOYMENT

9.1. Staff who wish to take up paid engagement outside work, excluding those on a part-time basis, must seek the written approval of CS-SUNN before accepting the job. Applications for outside work should be made to Chairman, Steering Committee for consideration. Approval will not be given if the outside work is in conflict with the interest of the Alliance.



SECTION TEN

10.0 NO DISCRIMINATION

10.1. CS-SUNN does not tolerate any discrimination by its members and employees, be it on the basis of age, physical disability, nationality, ethnicity, gender, political views, union activity, religion, culture, language, sexual orientation or other distinguishing characteristics. Members/Employees must therefore abstain from any and all kinds of discrimination as well as mobbing and bullying. Directing inappropriate, violent or insulting language at others, whether spoken or written, is prohibited. This also applies on social media.



SECTION
ELEVEN

11.0 RESPONSIBILITY FOR HEALTH AND SAFETY

11.1 Employees and members of CS-SUNN are obligated to observe relevant security policy at their place of work and to conduct themselves in accordance with it. They may not take any unnecessary risks with either their own health, safety and security or that of other employees, members, CS-SUNN project participants or third parties.



SECTION
TWELVE

12.0 NO SEXUAL VIOLENCE

12.1. CS-SUNN's employees and members commit themselves to an environment where the abuse of power is effectively prevented. Employees/members are therefore prohibited from engaging in any form of sexual violence. This includes sexual exploitation, abuse and harassment. Employees/members are forbidden from abusing their power or working relationships for the purpose of soliciting sexual favours. In addition, CS-SUNN is against any exchange of money, goods, services or favours for sexual services. Actions or statements with sexual undertones or connotations that make someone feel attacked or ashamed are also forbidden. This includes suggestive remarks, unwelcome physical contact or proximity, the display or sharing of suggestive material (e.g. via email or social media) and sexist conversations or jokes, whether in verbal, written or non-verbal form. (See CS-SUNN ANTI-HARASSMENT POLICY).



SECTION
THIRTEEN

13.0 CHILD PROTECTION

13.1. Children need special care and protection. Their well-being is CS-SUNN's utmost priority in all projects and programmes involving them. It forbids any conduct that could harm children. Employees and members must condemn any and all forms of child abuse and act accordingly and advocate for child protection.



SECTION
FOURTEEN

14.0 NO SUPPORTING OF TERRORISM OR MONEY LAUNDERING

14.1. All employees and members must ensure that no resources are used for money laundering or to support terrorist activities directly or indirectly at any time. All Employees/members are obligated to comply with the Anti-Terrorism Law.



SECTION
FIFTEEN

15.0 NO SUPPORTING OF TERRORISM OR MONEY LAUNDERING

15.1. Employees and members of CS-SUNN are not permitted to work under the influence of alcohol or drugs, including the operating of vehicles or machines. This also applies to other narcotics that impair the ability of Employees or members to perform their responsibilities for or on behalf of CS-SUNN. The possession, distribution and consumption of illegal substances at the workplace or on the job is prohibited. The workplace includes any vehicles owned or rented by CS-SUNN as well as properties, buildings and facilities used by CS-SUNN.

15.2. CS-SUNN pursues its objectives without violence. For this reason, it categorically prohibits the carrying of weapons by Employees and members on all properties and in all vehicles, buildings and other facilities used by CS-SUNN. Armed civilians or military personnel are categorically not allowed in CS-SUNN's vehicles, buildings or facilities nor on its properties. Consent for the employment of armed guards must be given by the Board of Trustees.



SECTION
SIXTEEN

16.0 COMPLIANCE WITH THE CODE

16.1. It is the personal responsibility of every member and staff of the Alliance to understand and comply with the Code of Conduct. CS-SUNN National Secretariat must thus disseminate it accordingly.

16.2. All managers should also in their daily supervision ensure that their subordinates understand and comply with the standards and requirements stated in the Code. Any problems encountered as well as any suggestions should be channeled to The Chairman Steering Committee through the Executive Secretary for consideration and advice.

16.3. Any member or staff of the Alliance who violates any provision of the Code will be subject to disciplinary action.

16.3. This Code is effective from the date adopted as shown below or at a later date as the Steering Committee deem appropriate. It shall not have any retrospective effect.



ANNEXURE

ANNEXURE

I. DEFINITION OF ADVANTAGE:

"Advantage" means:

- a). any gift, loan, fee, reward or commission consisting of money or of any valuable security or of other property or interest in property of any description;
- b). any office, employment or contract;
- c). any payment, release, discharge or liquidation of any loan, obligation or other liability, whether in whole or in part;
- d). any other service, or favour (other than entertainment), including protection from any penalty or disability incurred or apprehended or from any action or proceedings of a disciplinary, civil or criminal nature, whether or not already instituted;
- e). the exercise or forbearance from the exercise of any right or any power or duty; and
- f). any offer, undertaking or promise, whether conditional or unconditional, of any advantage within the meaning of any of the preceding paragraphs (a), (b), (c), (d) and (e), but does not include an election donation within the meaning of Nigeria's Electoral Act and Election Regulations, particulars of which are included in an election return in accordance with the laws.

II. WAYS TO DISPOSE OFF GIFTS TO STAFF:

Ways to dispose of gifts presented to a staff member in his official capacity:

- a). If the gift is of perishable nature (e.g. food or drink), it may be shared among people in the office or during an activity organised by a service unit of the Alliance.
- b). If the gift is a useful item, it may be sent to a charitable organisation or a service unit of the Alliance.
- c). If the gift is of historical or other interest, it may be sent to a library or museum.
- d). If the gift is suitable for display (e.g. a painting, vase, etc.), it may be retained for display in the recipient's office or elsewhere in the CS-SUNN.
- e). If the gift is of low value (below NGN5000), it may be donated to the Alliance's social function as a lucky draw prize.
- f). If the gift is a personal item of low value (below NGN5000), it may be retained by the recipient.

I. EXAMPLES OF CONFLICT OF INTEREST SITUATIONS:

Examples of Conflict of Interest Situations

- a). A staff or member takes part in the selection of suppliers or contractors, one of the bidders under consideration being his family member, relative or close personal friend.
- b). A staff member has a financial interest in a company which is being considered for selection as the Alliance's supplier of goods or services.
- c). A staff or member accepts frequent or lavish entertainment or expensive gifts from the Alliance's suppliers or contractors.

- d). A staff or member serves as a member of the Alliance's recruitment or promotion board, and one of the candidates under consideration by the board is his family member, relative or close personal friend.
- e). A staff or member responsible for processing applications for admission to a home for children or the elderly operated by the Alliance is considering an application from his family member, relative or personal friend.

ADOPTED THIS DAY OF 20

SIGNATURE

POSITION

DATE

SIGNATURE

POSITION

DATE



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