This code of conduct is based on four common values that define our corporate culture:

- Respect
- Integrity
- Solidarity
- Efficiency
SCOPE OF APPLICATION

The code of conduct applies to:

• members of the board of directors;
• the management of LuxDev;
• all employees at headquarters and Country/Regional office (ROF);
• project and programme staff;
• junior technical assistants;
• technical assistants and international, regional and national experts;
• trainees, students, volunteers and temporary staff.

GENERAL CONDUCT

We are committed to:

• respecting and acting in accordance with the Agency’s values;
• respecting the charters, procedures and internal regulations governing the activities and operations of the Agency;
• respecting the laws and regulations in force in Luxembourg and in our countries of intervention;
• respecting local, national and international institutions as well as their symbols;
• respecting the environment and looking after its protection;
• adopting a respectful and culturally appropriate attitude towards colleagues, partners and beneficiaries, avoiding any form of discrimination and remaining respectful of people’s privacy;
• devoting all our competencies towards the accomplishment of work and developing them;
• adopting a listening attitude and/or teamwork and support;
• comply with the provisions of the Agency’s security and safety policy.

RESPECT AND PROTECTION OF PERSONS

We respect the fundamental right of non-discrimination on the basis of gender. We apply gender equality at work, and at all levels (recruitment, selection, training, remuneration and promotion).

We consider sexual exploitation and abuse a violation of human rights, and that exploitation in any form, of human beings and of children in particular, constitutes an unacceptable attack on human dignity1.

We do not tolerate any form of harassment nor violence in the workplace or in relation to work2.

Through our actions, we avoid endangering our health and that of others. We ensure that safety is part of our daily habits.

Working under the influence of illicit or narcotic substances is prohibited, as well as their consumption in the workplace. Exceptionally, on the occasion of events organised by the management or its local representatives, alcohol beverages may be served and consumed in moderation.

We do not collect or process personal data disclosing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, data on health or sexual orientation. We do not disclose personal data to unauthorised persons, we use personal data in line with specific needs and store it only for requisite period3.

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1 cf. Policy on the Prevention of Sexual Exploitation and Abuse, RHU_172
We do not tolerate reprisals against employees who have reported in good faith illegal or irregular acts or who have contributed to the investigations following such reports. LuxDev recognises that is preferable to prevent litigation and to resolve disputes amicably by promoting the path of mediation.

**DRESS CODE**

Every employee is aware that he is - each at his/her own level of responsibility - a representative of LuxDev and beyond that, the Luxembourg Cooperation.

Therefore, in a professional environment, it is necessary to adopt an appropriate and clean outfit.

When meeting with our colleagues from the Ministry of Foreign and European Affairs or attending official events (assises de la coopération, partnership commissions), men are expected to wear a jacket.

When on mission, we must respect the local dress code and be aware of our physical appearance and its social significance. When in doubt, the resident representative can advise.

**RESPECT AND PROTECTION OF TANGIBLE AND INTANGIBLE ASSETS**

We demonstrate integrity and transparency in carrying out our professional activity, and we act in accordance with the laws and regulations concerning the prevention of corruption, fraud and any other prohibited practices. We are committed to waiving the right to claim, accept, offer or give, directly or indirectly, facilitation payments or presents and benefits.

We make sure not to place ourselves or be placed in a situation with a conflict of interest, i.e. a situation in which we have, ourselves or via another person, an interest likely to influence the impartial and objective exercise of our function. This can occur particularly in the call for tenders or recruitment.

It is our duty to protect against waste, loss, damage, abuse, theft and any form of misuse of the Agency’s assets, namely movable and immovable goods, financial resources and sensitive information belonging to LuxDev or used in our projects/programmes. The personal use of these assets may only be made within the framework of the rules laid out or with prior approval from your manager.

Behaviours, activities (political and other) and relationships developed outside the professional context must not undermine the dignified, neutral, loyal and impartial execution of our function.

During external communication, we make sure not to harm the image of LuxDev nor that of the Luxembourg Cooperation.

Regarding the use of the computer system, and concerns for computer/IT security:

- we recommend using passwords separate from those used for social and/or commercial networks and to change them regularly;
- no email should be sent by a user of LuxDev’s IT system to a recipient outside of LuxDev without authorisation;
- no email including those for private use should include elements of an offensive, defamatory or offensive nature;
- messages not identified as private are presumed to be professional;

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4 cf. Whistleblowing policy and procedure, STM_50.
5 cf. Charter on mediation signed by LuxDev in October 2015, STM_51.
7 cf. LuxDev’s Graphic Charter, COM_5.
8 cf. LuxDev’s IT Charter SL_2.
9 This authorisation may be specific or general, permanent or provisional, recorded or not (for example, in the job description, or the procedures of the Agency). If in doubt, refer to your supervisor.
• the consultation of websites for private purposes is only allowed to the extent that this browsing does not hinder professional access and does not interfere with the smooth running of the user’s work.

Depending on the situation, we are committed to using the least expensive means of communication among the tools made available by LuxDev.

**RESPECT AND PROTECTION OF THE ENVIRONMENT**

We recognise that environmental degradation compromises development and threatens its future progress as well as all aspects of human wellbeing.

Through the implementation of its environmental and social policy, LuxDev seeks better impact on sustainable development by allowing for a better management of environmental and social risks, better value and management of resources, as well as a positive contribution to common goods and services.

Thus, we commit ourselves to setting a good example and promoting the principle of sustainability and environmental awareness at all levels of the Agency, including projects and programmes, and to:

• Comply with all the environmental laws and regulations, and the Luxembourg Cooperation’s commitments to sustainable development;
• Prevent pollution and reduce the consumption of resources through waste management strategies that promote reusing, reducing, recovery and recycling, where appropriate;
• Avoid any form of waste by adopting cost-saving measures in our daily lives;
• Integrate energy efficient measures in the Agency’s premises (in Luxembourg and in the field) and promote the efficient use of energy in all areas of activity;
• Adopt “Green” procurement principles taking into account the environmental and social impact of products and services and supporting the purchase of sustainable products;
• Pursue a programme of continuous improvement by examining our environmental management system and its related objectives, targets, policies and practices.

**COMPLIANCE WITH THE AGENCY’S SECURITY AND SAFETY POLICY**

The security and safety policy of LuxDev\(^{10}\) has been established to protect the Agency, meaning its employees, operations, data, buildings and infrastructure as well as its reputation.

The security and safety policy sets out the rules governing the management of security and safety by all LuxDev offices in all territories where the Agency operates. It applies to all entities and employees of the Agency including their accompanying family who undertake to respect it.

Because some of LuxDev’s actions take place in areas with an impaired security level, it is important to remember that the staff safety takes precedence over all other considerations.

Security and safety are everyone’s business, and everyone is therefore expected to be aware of and comply with the measures outlined in this policy, and to assume a responsible attitude to monitoring, reporting and preventing risks in this regard.

\(^{10}\) cf. Security Corpus - Security and Safety Policy, STM_60.
REPORTING OBLIGATION

The code of conduct covers a wide variety of situations but cannot address all daily work situations.

We are committed to reporting without delay any illegal or irregular actions by a member of staff or partner of the Agency according to the mechanisms in place or directly to the managing director and the chairman of the audit committee via the email: integrity@luxdev.lu.

MEMBERSHIP AND RESPONSIBILITY

• I have read, understood and agree to comply with the guidelines of the code of conduct;
• I agree to report any breach of the code of conduct;
• I understand that any breach of the code of conduct may be subject to sanctions.

Name: _______________________
Signature: _____________________ Date: ______________________

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11 cf. Whistleblowing policy and procedure, STM_50.
respective
integrity
solidarity
efficiency