



ACCEPTED
by the TBEC Board
on February 11, 2025

A handwritten signature in blue ink, which appears to be "P. Sommerfeld", is written over a horizontal line.

Paul Sommerfeld,
Chair of TBEC Board

CODE OF ETHICS AND CONDUCT

OF STICHTING TB EUROPE COALITION



CODE OF ETHICS AND CONDUCT OF STICHTING TB EUROPE COALITION

1. General Provisions

1.1. Purpose of the Code

This Code defines work standards and helps to maintain the good name of Stichting TB Europe Coalition (TBEC). The Code brings together basic expectations and principles that govern professional conduct of employees and consultants of TBEC, other individuals representing TBEC (collectively “Covered Individuals”) within the framework of TBEC's activities, including relevant decision-making. The Code is designed to facilitate implementation of TBEC's statutory goals and objectives, to improve efficiency and effectiveness of its work, as well as to protect and support TBEC's reputation and values.

1.2. Compliance and Application of the Code

TBEC's employees and other Covered Individuals are expected to comply with the principles and requirements set forth in this Code. Line managers are responsible for ensuring that employees adhere to the principles and requirements set forth in this Code. If the Code does not state that appropriate behavior is expected only of a certain category of persons, it should be understood that such behavior is expected of all Covered Individuals.

If the Code does not provide for certain situations, such situations are resolved by TBEC's Chair of the Board on the basis of the principles set forth in the Code. If there are insurmountable legal obstacles or other special conditions for the application of the Code, any deviations from the Code shall be agreed upon by TBEC's Chair of the Board.

1.3. Violation of the Code

Violation of the Code may result in disciplinary or other liability depending on the status of the Covered Person. Before applying formal sanctions, the circumstances of the case will be duly investigated. During such an investigation, the seriousness of the violation as such, whether the violator received sufficient information to realize that his/her actions constituted a violation, and other relevant facts will be taken into consideration.

2. Requirements to Behavior in Internal and External Relations

2.1. Basic Requirements to TBEC's Employees:

- *Integrity*: includes such basic qualities as honesty, truthfulness, neutrality, non-acceptance of corruption, other improper practices, respect for the value of life of each individual, compliance with other moral and ethical requirements;
- *Respect for human dignity and zero tolerance for any form of discrimination*: every employee must respect human dignity, treat everyone equally, regardless of their race, skin color, political, religious and other beliefs, sex, gender identity, sexual orientation, of ethnic, social and foreign origin, on linguistic or other grounds, must not allow any manifestations of discrimination, and in case of their detection - notify authorized persons of TBEC;
- TBEC's employees, while performing their duties, should in all cases remain objective, not show bias, be tolerant and restrained, especially in controversial situations.
- Activities of TBEC as a whole as well as of its employees within TBEC's activities must be accountable and meet the expectations of the public.

These basic requirements determine relations of TBEC's employees with colleagues, partners and other external contacts.



Other Covered Individuals are similarly expected to comply with the requirements specified in this section.

2.2. External Relations (Beneficiaries, Donors, Other Partners, etc.)

TBEC's reputation depends mainly on how its representatives work with external individuals and organizations. Such representatives are expected to act in ways that uphold TBEC's reputation and respect the values and cultural features of everyone with whom TBEC works. Communication (in person, by phone, e-mail, correspondence) should be prompt, polite and effective.

TBEC attaches particular importance to the effective functioning of the relations established with beneficiaries, partners, donors, governmental bodies, other charitable and public organizations. TBEC seeks to maintain and develop these relationships and expects the same from its representatives.

2.3. Relations with Colleagues

TBEC is committed to eliminating all forms of discrimination, harassment and intimidation in the workplace.

TBEC adheres to a policy of absolute intolerance (zero tolerance) to any manifestations of exploitation, violence, bullying, mobbing or harassment (harassment) both within TBEC and in relation to TBEC's partners, as well as in the communities where TBEC operates.

All Covered Individuals are expected to maintain the highest standards of personal and professional conduct at all times and to provide TBEC's activities in a manner that respects and promotes the rights of beneficiaries of such activities and other members of the communities in which TBEC operates.

Employees of TBEC are collectively responsible for creating and maintaining a favorable working atmosphere of mutual respect, support and courtesy in TBEC.

2.4. Compliance with Legislation

TBEC and all Covered Individuals are obliged to act in accordance with the legislation of Netherlands in all aspects of their activities.

2.5. Privacy. Processing of Personal Data and Use of Images

Confidential information in any form, including written, electronic or verbal, is not subject to disclosure. Typically, this means that such information or other sensitive data will not be disclosed outside of TBEC, unless it is required by the law or other obligations of TBEC.

Confidential information remains confidential to all Covered Individuals familiar with it, even after the termination of the relationship with TBEC.

Any processing of personal data of individuals and/or use of their images within the framework of TBEC's activities must be carried out with their explicit consent and under the conditions of such consent, unless otherwise provided by current legislation, and for the purposes of implementing TBEC's activities.

2.6. Financial Management and Accountability

TBEC's commitment to corporate and financial management standards is important. Violation of these standards threatens the reputation and effectiveness of TBEC. TBEC is obliged to correctly and purposefully use the received funding for the implementation of its projects and activities. TBEC's



financial operations and reporting may be audited by auditors and regulatory bodies. Financial statements completed by or for which data are provided by TBEC's employees or other relevant Covered Individuals must truthfully and fully reflect the nature of the transactions they describe.

2.7. Protection of TBEC's Property

It is necessary to take all reasonable and adequate measures to protect all forms of TBEC's material assets. This requirement applies not only to the risk of loss or damage, but also to compliance with fire safety regulations, theft prevention, etc.

2.8. Computer Technology

All computer programs used by TBEC must be used in accordance with the rules defined by the relevant license. Computer system login and passwords must be confidential information.

2.9. Decision Making and Conflict of Interest

Decision-making in TBEC should be as rational and transparent as possible, without compromising consistency with coordination, quality control and cost effectiveness.

In order to avoid misunderstandings, inconsistencies in decisions and reduction of cost effectiveness, all necessary persons and all available information must be involved in decision-making. Any recommendations cannot be simply ignored. If two parties cannot reach an agreement, then the matter is referred to a higher level for resolution. If necessary, responsibility for decision-making is delegated.

In order to comply with ethical standards, employees and other relevant Covered Individuals must avoid participating in matters that conflict with or interfere with the activities of TBEC or in any other way may negatively affect the interests of TBEC. Employees of TBEC must also avoid using the official position of an employee for the purpose of obtaining personal profit or advantage. All employees and relevant Covered Individuals must comply with the provisions of TBEC's Conflict of Interest Policy.

2.10. Activities Outside TBEC

TBEC expects its employees to notify TBEC of their intentions to perform paid work outside TBEC.

TBEC encourages activities outside the framework of the organization and does not seek to hinder such activities. At the same time, it is necessary to avoid activities that may harm TBEC or otherwise negatively affect its activities, including those constituting a conflict of interest with the activities of TBEC or contradicting the mission, values and/or principles adopted by TBEC or for its programs (projects).

TBEC encourages all Covered Individuals to act in accordance with the principles set forth in this Code, both within TBEC's activities and outside.

2.11. Statements

TBEC's employees, other persons who can act on its behalf, should not make statements that could harm the reputation of TBEC or lower its credibility. This principle should be also followed when making comments that concern both TBEC and colleagues in TBEC, its partners, regardless of whether these comments are official or unofficial.



When expressing social or political views in written or verbal form, employees of TBEC, other persons who may act on its behalf, must clearly indicate that they are expressing their own views and not the opinion of TBEC.

TBEC does not cooperate with any individuals who openly express their support for any aggression, invasion, terrorist activities, as well as related military operations or actions with regard to any country. This includes election to TBEC's governing bodies, recruitment, conclusion of contracts and other forms of cooperation.

2.12. Use of the TBEC's Resources

Covered Individuals must not use TBEC's assets, infrastructure or name for profit or in private interests.

TBEC's employees are prohibited from using equipment, materials, computer systems, or other resources belonging to TBEC to perform any freelance activity without obtaining the prior consent of the manager. Occasional use of e-mail, telephone, and Internet access is permitted for urgent private matters, all other exceptions to this general rule must be agreed with the immediate supervisor.

2.13. Gifts and Hospitality. Prevention of Fraudulent, Corrupt and Other Improper Practices in TBEC

TBEC's employees, other relevant Covered Individuals must not accept from persons or offer or give to persons with whom TBEC is in contact gifts, monetary rewards, any other type of material incentive such as commissions or similar payments or services of commercial value, which can be considered as encouragement or gratitude for a certain decision, action, work, other performance of their duties

The only exception to this rule are situations when the gift is casual, has a symbolic value and is a sincere expression of gratitude, and its acceptance or giving is not considered inappropriate behavior: for example, a gift with value not exceeding UAH 500.00 (five hundred), provided that the total value received from or given to one person per calendar year does not exceed UAH 1,500.00 (one thousand five hundred).

Gifts received for TBEC as an organization are transferred to TBEC as a voluntary, disinterested charitable donation.

In the event when a polite refusal may seem insulting or jeopardize the interests of TBEC, relevant person should seek advice from TBEC's Chair of the Board.

Similarly, in the course of performance of professional duties, it is prohibited to accept or offer to others hospitality that goes beyond traditional and customary hospitality. If relevant persons have doubts, they should seek advice from TBEC's Chair of the Board.

All employees and other relevant Covered Individuals must comply with the provisions of TBEC's Anti-Fraud, Bribery and Corruption Policy.

2.14. Employment of Spouses, Family Members or Friends

If an employee of TBEC learns that a person with whom he/she is in a marital, family or friendship relationship has received a job offer from TBEC, this employee must notify his/her immediate supervisor. The job may be provided if it does not affect the integrity and independence of financial or other management control in the organization. There may be a need to adapt management structures to ensure necessary segregation of duties.



2.15. Protection of Key Populations

TBEC adheres to a policy of absolute intolerance to any manifestations of discrimination against persons belonging to key populations that TBEC supports and in every way promotes the comprehensive realization of the rights of such persons.

2.16. Child Protection

TBEC believes that it is unacceptable for a child or young person to experience any form of abuse and recognizes its commitment to safeguarding the wellbeing of all children and young people. All employees and other relevant Covered Individuals must comply with the provisions of TBEC's Child Protection Policy.

2.17. Protection from Sexual Exploitation, Abuse and Harassment ("SEAH").

TBEC reaffirms its commitment to the Bulletin of the UN Secretary-General on Special Measures for Protection against Sexual Exploitation and Sexual Abuse (ST/SGB/2003/13) and to achieving full and continuous implementation of IASC Six Core Principles Relating to Sexual Exploitation and Abuse. SEAH violates generally recognized international legal norms and standards and is unacceptable and prohibited behavior for all Covered Individuals. TBEC adheres to a policy of absolute (zero) intolerance to SEAH. All Covered Individuals are expected to maintain the highest standards of personal and professional conduct at all times and to provide assistance and services in a manner that respects and promotes the rights of beneficiaries and other members of the communities in which TBEC operates. TBEC will make every effort to create and maintain a safe environment that is free of SEAH, and will take appropriate measures to this end both within its own organization and in the communities where it operates, through appropriate SEAH prevention and response measures. All employees and other relevant Covered Individuals must comply with the provisions of TBEC's Protection from Sexual Exploitation, Abuse and Harassment Policy.

2.18. Obligations to Disclose Facts

If the Covered Person knows of a situation that may harm the interests of TBEC, such a person must notify TBEC's Chair of the Board. All disclosed facts will be considered as confidential information.

3. Support

TBEC cooperates with its partners in order to include in their own programs and projects, as well as to implement and observe in their activities the principles set forth in this Code, to develop their own similar policies by informing, assisting in the organization of necessary trainings, developing joint programs (projects), defining contractual conditions, and acceptable means.



Annex 1

Of Code of Ethics and Conduct

FORM OF CONSENT

for the use of the image

I, _____,

(full name)

give my consent to Stichting TB Europe Coalition" (hereinafter - TBEC) as well as to the Donor (as defined below) to carry out within the implementation of project " _____" (hereinafter — the "project"), which is financed by the grant provided by _____ (hereinafter — the "Donor"), as well as within the promotion of such activities, a photo shoot and/or video filming with my participation, as well as for the public display, reproduction and distribution of photos/videos obtained as a result of the photo shoot/video filming with my image in reports, informational and educational materials, including video and photo materials, visual design of events and/or premises of the TBEC and/or the Donor, in any other materials related to the project and/or statutory activity of the TBEC and/or the Donor, for the purpose of implementing and popularizing the project, other statutory activity of the TBEC and/or the Donor.

My consent includes, in particular, consent to the public display, reproduction and distribution of photos/videos obtained as a result of photo shoot/video filming with my image as part of materials that the TBEC and/or the Donor place on their own websites, pages in social networks, in printed materials of the TBEC and/or the Donor, in printed and/or electronic mass media, in the premises where the TBEC's and/or the Donor's activities are held, their statutory activities, in any other legal forms.

Date Signature



Annex 2
Of Code of Ethics and Conduct

FORM OF CONSENT

for the use of the image of the child

We, _____,

(full name)

father and mother of _____,

(name and surname of the child)

on our and our child's behalf give our consent to Stichting TB Europe Coalition" (hereinafter — TBEC) as well as to the Donor (as defined below) to carry out within the implementation of project " _____ " (hereinafter — the "project"), which is financed by the grant provided by _____ (hereinafter — the "Donor"), as well as within the promotion of such activities, a photo shoot and/or video filming with my participation, as well as for the public display, reproduction and distribution of photos/videos obtained as a result of the photo shoot/video filming with my image in reports, informational and educational materials, including video and photo materials, visual design of events and/or premises of the TBEC and/or the Donor, in any other materials related to the project and/or statutory activity of the TBEC and/or the Donor, for the purpose of implementing and popularizing the project, other statutory activity of the TBEC and/or the Donor.

as well as to the Donor (as defined below) to carry out within the implementation of project " _____ " (hereinafter — the "project"), which is financed by the grant provided by _____ (hereinafter — the "Donor"), as well as within the promotion of such activities, a photo shoot and/or video filming with the participation of us and/or our child, as well as for the public display, reproduction and distribution of photos/videos obtained as a result of the photo shoot/video filming with the image of us and/or our child in reports, informational and educational materials, including video and photo materials, visual design of events and/or premises of the TBEC and/or the Donor, in any other materials related to the project and/or statutory activity of the TBEC and/or the Donor, for the purpose of implementing and popularizing the project, other statutory activity of the TBEC and/or the Donor.

Our consent includes, in particular, consent to the public display, reproduction and distribution of photos/videos obtained as a result of photo shoot/video filming with the image of us and/or our child as part of materials that the TBEC and/or the Donor place on their own websites, pages in social networks, in printed materials of the TBEC and/or the Donor, in printed and/or electronic mass media, in the premises where the TBEC's and/or the Donor's activities are held, their statutory activities, in any other legal forms.

Date Signature

Date Signature