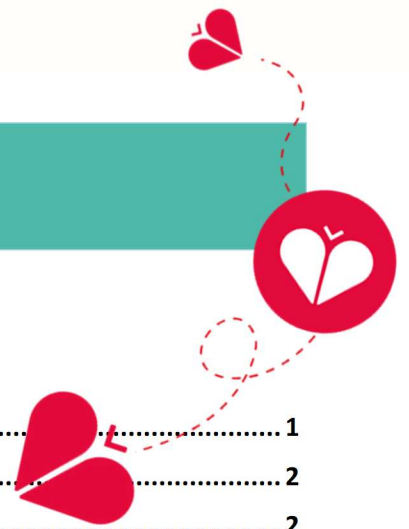


# INTEGRITY POLICY



## Table of contents

1. The values of the Damien Foundation .....	1
2. Scope of integrity policy .....	2
3. Specific roles .....	2
4. Reporting a complaint .....	3
5. Appropriate measures .....	3
6. Risk analysis and preventive measures .....	4
7. Controls .....	4
8. Partner contracts .....	5
9. Corporate gifts .....	5
10. Communication .....	6
11. Raising awareness and training .....	6
12. Collaboration .....	7
Appendix 1: Code of ethics .....	7
Appendix 2: Investigation protocol .....	7
Appendix 3: Crisis management procedure .....	7

## 1. The values of the Damien Foundation

The values Damien Foundation upholds are pluralism, independence, responsibility, integrity and respect. The organisation’s code of ethics (see Appendix 1) is grounded in these values.

### Integrity charter signed by CSOs in 2018 – point 1

Damien Foundation complies with point 1 of the integrity charter as per its code of ethics signed by the foundation’s employees.

## 2. Scope of the integrity policy

The Integrity policy applies to all Damien Foundation stakeholders: the General Assembly, the administrative body, employees, volunteers, interns, students, beneficiaries, suppliers, partners, financial backers and donors. The term “employee” refers to any individual who has an employment contract with Damien Foundation.

The integrity policy’s scope determines its implementation. Signed by Damien Foundation’s managing director in 2018, the policy is legally binding.

## 3. Specific roles

Three individuals hold specific roles regarding integrity issues:

- **Head of integrity:** the person in charge of setting forth and implementing effective integrity policies in compliance with the integrity charter, as well as building an integrity culture. The head of integrity ensures the elaboration and implementation of necessary procedures.
- **Integrity advisor:** the person to safely contact for advice regarding integrity issues. The integrity advisor is bound by duty to not disclose confidential integrity information except in extraordinary circumstances, such as grave or imminent danger to an individual or to the organisation. The integrity advisor is trained to properly accomplish his/her duties.
- **Complaints manager:** ensures complaints are properly identified and treated. The complaints manager will promptly inform the Damien Foundation director of a complaint, ensure individual anonymity and not disclose the details of a given complaint. The complaints manager is bound by duty to not disclose confidential integrity information except in extraordinary circumstances, such as grave or imminent danger to an individual or to the organisation.

In the event a complaint is raised against the managing director or a member of the administrative body, or if the individuals concerned are too involved in the complaint scenario itself, the complaints manager can solicit help from an outside firm specialising in integrity issues.

Contact details for these three individuals as well as for the firm that specialises in integrity issues can be found on the Integrity page of the Damien Foundation website.

#### **Integrity charter – points 3 and 6**

The identification of an integrity advisor and a complaints manager ensures compliance with points 3 (the possibility of safely contacting an advisor) and 6 (confidentiality and prompt treatment of submitted complaints) of the integrity charter.

#### **4. Reporting a complaint**

The Damien Foundation website provides an email address to which all integrity-related queries and complaints should be sent. This email address is available to everyone.

Integrity-related complaints are treated by the Damien Foundation complaints manager, in compliance with the internal policy regarding treatment of complaints (see Appendix 2 – Investigation Protocol). Neutrality, confidentiality and prompt response are ensured in compliance with the integrity charter.

Complaints against the complaints manager shall be submitted to the outside firm specialised in integrity issues.

#### **Integrity charter – point 6**

By providing an email address to which to send queries and complaints, as well as setting up a procedure that focuses on confidentiality and prompt treatment of complaints, the NGO ensures the implementation of point 6 of the integrity charter.

#### **5. Appropriate measures**

Following a report of a (potential) violation of integrity, appropriate measures are promptly taken:

- We do everything possible to ensure that the (potential) violation of integrity promptly ceases.
- If needed, we make sure that the presumed wrongdoer no longer has access to the (potential) victim or to the whistleblower, in order to prevent retaliation, misappropriation or any other form of pressure.
- We provide assistance to the (potential) victim and to whistleblowers. In accordance with the RD of 28 February 2023, assistance with the whistleblowing procedure, as well as access to medical and psychosocial support are provided.

Once the investigation regarding the (potential) violation of integrity is finished, and

if it concludes that a violation of integrity did in fact take place, appropriate sanctions are taken against the wrongdoer (see point 6 – Disciplinary measures, Investigation protocol).

#### **Integrity charter – point 8**

By promptly taking appropriate measures, Damien Foundation implements point 8 of the integrity charter. Said measures are set forth in the investigation protocol (see Appendix 2 – Investigation protocol).

### **6. Risk analysis and preventive measures**

In late 2023, Damien Foundation established a global risk analysis of the organisation. The analysis determined risks in the following areas: governance & strategy, finance, organisation & HR, legal & tax requirements, reputation & image, IT, and organisational matters.

A recent update of these risks helped identify a number of major risks based on impact score and probability. A risk mitigation plan is elaborated and implemented for each major risk. Such plans are assessed and monitored every six months.

#### **Integrity charter – point 4**

Every six months, Damien Foundation updates its risk analysis and sets forth a mitigation plan in order to monitor, among others, potential integrity risks.

### **7. Controls**

In accordance with point 7 of the integrity charter, we take preventive measures but also carry out controls that focus on moral and financial integrity.

- 7.1. The head of integrity carries out controls to ensure that procedures are properly implemented by the integrity advisor and the complaints manager, and ensures that the integrity policy is up to date.
- 7.2. In terms of financial integrity, Damien Foundation has set up a robust internal control system that ensures transparency and compliance at every financial management level. Not solely restricted to post-controls meant to detect and identify violations of integrity, the system also includes thorough internal preventive controls meant to anticipate and deter unforeseen events regarding

inadequate financial management, fraud or corruption.

These measures include enhanced supervision, regular audits, and rapid alert mechanisms to detect and correct any defaults, and ensure exemplary governance and proactive protection against integrity-related risks.

Our statutory auditor conducts ad-hoc audits on the internal control system twice a year (an interim audit and an audit at the end of each financial year). In certain cases, the statutory auditor also offers optimisation recommendations.

In addition to the internal control system and annual audits, the DGD also carries out a control of grant usage.

Further information regarding the Damien Foundation's internal control system is available in our policy/documents regarding financial management and internal controls.

#### **Integrity charter – point 7**

At least once a year, Damien Foundation carries out controls to identify potential violations of moral and financial integrity, and to improve its systems, hence implementing point 7 of the integrity charter.

### **8. Partner contracts**

Our partner contracts / collaboration agreements include a paragraph about integrity. With regards to current collaboration agreements with partners in countries in which Damien Foundation operates, a letter describing the context and referring to the code of ethics is sent via country representatives.

#### **Integrity charter – point 5**

By referring to integrity in its partner contacts and collaboration agreements, Damien Foundation complies with point 5 of the integrity charter.

### **9. Corporate gifts**

All corporate gifts received by Damien Foundation staff shall not influence decisions regarding Damien Foundation activities. Gifts with a value over €25 must be reported to the head of integrity by email within three working days, entered in a list and stored in the store. Corporate gifts must be used for work-related

activities (i.e.: a group event or a meal).

## 10. Communication

Damien Foundation is transparent with its stakeholders and the public.

The organisation mainly uses its website to communicate about integrity issues: number of alerts received, number of submitted complaints and their current status. The organisation ensures that the treatment of complaints is carried out in full confidentiality, and that the privacy of (potential) victims, (potential) wrongdoers and other concerned parties is safeguarded.

In the event of crisis communication regarding a violation of integrity, we follow the crisis management procedure (see Appendix 3).

### Integrity charter – point 9

Once a year in our annual report, and in compliance with individual privacy laws, we communicate regarding integrity breaches.

## 11. Raising awareness and training

### 11.1. Raising awareness

During our weekly staff meetings, we regularly remind everyone about our code of ethics and integrity policy, the reporting procedure on our intranet and website, and the individuals who are in charge of integrity issues.

When a new person is hired, the People & Development team discuss the code of ethics during the onboarding process. It is also discussed with the employee's line manager during the Alignment & Development meeting (work meeting).

Raising awareness among volunteers is mainly done through the newsletter they receive several times a year.

Monthly meetings with country representatives serve to discuss integrity issues. Country representatives must ensure that their projects comply with integrity issues.

### 11.2. Training

The integrity advisor and the complaints manager receive training.

Employees are also trained in integrity issues by an organisation that specialises in

such matters. Training programme content is determined in collaboration with the organisation, and according to specific needs and practical cases.

#### **Integrity charter – point 2**

We regularly raise awareness about integrity issues among our employees, volunteers and partners. We organise integrity-related training sessions.

## **12. Collaboration**

We work with an external expert organisation to:

- develop and improve our integrity policy,
- manage complaints (advice/support).

We are active participants in the federations' integrity working group. It is a means for us to improve our practices through discussions with other CSOs.

Analysing complaints helps us to learn, strengthen our systems and decide whether to take additional preventive measures.

#### **Integrity charter – point 10**

We actively collaborate with other players to implement these measures, develop current principles and strive to continuously improve our systems.

### **Appendix 1: Code of ethics**

### **Appendix 2: Investigation protocol**

### **Appendix 3: Crisis management procedure**