

I. INTRODUCTION

The capacity of Planète Enfants & Développement to fulfill its mission depends on the ability of its collaborators to respect and promote the highest standards of ethics and professional conduct, and to ensure that the expected roles and responsibilities in this area are known within the organization.

All collaborators of Planète Enfants & Développement commit to respecting local and international law, the duties and legislations of host countries, and commitments made with local authorities and partners, as well as the association's operational ethics, governance rules adopted by its general assembly, and the internal Code of Conduct.

The objective of this policy is to affirm the commitment of Planète Enfants & Développement to ethics, as well as to prevent and apply zero tolerance toward any professional misconduct or inappropriate behavior. This includes any form of violence, discrimination, harassment, abuse, or exploitation—including of a sexual nature—toward any person, as well as fraud, corruption, or theft.

This policy aims to establish and communicate our whistleblowing mechanism procedures and the principles of intervention that will be applied within the organization when a complaint is filed or a situation is reported. It also aims to ensure that individuals who report inappropriate behavior are not penalized and are protected.

II. SCOPE OF APPLICATION

Persons suspecting inappropriate behavior or professional misconduct have the obligation to report this information through this whistleblowing mechanism procedure. This policy applies to all personnel of the organization, regardless of their contractual status or country of intervention.

Those concerned include:

- Directors
- Employees
- Consultants
- Volunteers
- Contractual partners
- Interns and apprentices

It applies to behavior in the workplace and in any other location or context in which persons may find themselves in the course of their employment, including outside of working hours (e.g., travel, visits, events, etc.). This policy also covers communications transmitted or received by any means, technological or otherwise, within a work context.

III. DEFINITIONS OF PROFESSIONAL MISCONDUCT

- **Discrimination:** Unequal treatment based on a prohibited criterion (in particular: age, sex, gender identity, sexual orientation, origin, membership or non-membership of an ethnic group, nation or alleged race, pregnancy, state of health, disability, genetic characteristics, political and philosophical opinions, trade union activities and religion).
- **Harassment:** Characterized by the fact of imposing on a person, repeatedly, words or behaviors whose purpose or effect is a degradation of working conditions likely to infringe on their rights and dignity, to alter their physical or mental health or to compromise their professional future. It can result in various behaviors of a verbal, non-verbal or physical nature, and can materialize online.
- **Sexual harassment:** A specific type of harassment. It is characterized by repeated words or behaviors with a sexual or sexist connotation that are felt by the person who is the subject as infringing on their dignity because of their degrading or humiliating nature, or create an intimidating, hostile or offensive situation against them. Sexual harassment generally involves a set of behaviors, but it can also take the form of a single incident. Similarly, it can translate into various behaviors of a verbal, non-verbal or physical nature.
- **Physical violence:** Any act or non-accidental behavior causing injury, trauma or other physical suffering or bodily harm. This can take the form of slaps, punches, shaking, kicks, burns, shoves or grabs. Injuries can take the form of bruises, cuts, burns or fractures. Other terms are sometimes used, such as "physical assault" or "physical violence", and may also include sexual abuse. Physical violence can involve multiple aggressors and multiple victims.
- **Psychological violence:** Behavior causing psychological trauma or stress. It can take the form of insults, threats, mockery, intimidation or isolation.
- **Violence:** Encompasses all acts that involve the intentional use of power or verbal or physical force, threatened or real, against any person, which results in or is likely to result in real or potential harm to the health, survival, development or dignity of that person.
- **Sexual abuse:** Any sexual assault committed under force, under constraint or through an unequal relationship, or the threat of such an assault.
- **Abuse :** all acts or omissions that cause harm or injury towards a vulnerable person. Abuse is generally classified under one of the four following categories : physical abuse, emotional abuse, sexual abuse, and negligence, but it could take any form.
- **Sexual Exploitation :** Sexual exploitation is the actual or attempted abuse of a position of vulnerability, of differential power or trust for sexual purposes. This includes all sexual relations with beneficiaries and/or all exchanges of money, job offers, employment, goods or services in exchange for sex or sexual favors or any forms of humiliating, degrading or exploitative behavior. This could also include undisclosed or unbalanced sexual relations.

- **Child Abuse** : A child is defined as all persons under 18 years of age. The abuse of children could be physical (violence or intentional injury towards a child), emotional (behavior that attacks the self esteem of a child), sexual (using a child as a means of sexual stimulation or gratification), negligence (persistent failure to meet a child's physical/psychological needs) or implying any other sort of harm towards a child including the possession and/or the distribution of indecent images of children.
- **Fraud** : An act or omission that intentionally attempts to deceive in order to gain an advantage or to evade an obligation. This could also involve an abuse of position. Examples could be the falsification/modification of an invoice, the exaggeration of a receipt submitted for expenses, or the action of a third party supplier deliberately providing inferior quality products, or providing less product than agreed.
- **Theft** : The act of dishonestly taking another's property without consent, with the intentions of permanently depriving them of it.
- **Corruption** : When an individual inappropriately offers, gives, or promises (or solicits, agrees to receive, or receives) any form of material or other advantage, whether in cash or in nature, to another person in order to influence their conduct in any way.

IV. ORGANIZATIONAL POLICY

This policy reflects the principles and practices of Planète Enfants & Développement that applies to all behaviors in the workplace and during the conduct of activities. Employees of Planète Enfants & Développement are personally and collectively responsible for respecting the requirements outlined in this policy.

- All staff members are required to immediately report any suspicious cases or alleged abuse related to their official duties.
- Planète Enfants & Développement recognizes its responsibility to watch over all staff members, volunteers, members of the board of directors, and all other people who work with or represent PE&D should be clearly informed of the standards of behavior and practices that apply to them when in contact with other people, in particular the most vulnerable.
- All staff members who engage in inappropriate or prohibited behaviors under the law will be subjected to proportionate disciplinary actions, which could lead to immediate dismissal. The hierarchical superiority and seniority of a staff member does not provide immunity in any way and may be considered an aggravating circumstance.
- All allegations surrounding inappropriate behavior will be subject to an impartial, thorough, and quick investigation, that will be handled in a fair manner by all concerned parties. The organization will oversee that the rights of all parties are entirely protected, and the confidentiality of the file is respected.

- Planète Enfants & Développement recognizes that sexual abuse and sexual harassment in specific are byproducts of a culture of discrimination and unequal power relations. It constitutes a violation of fundamental rights, notably the right of equality, and fosters a hostile work environments that limits the victim's ability to thrive.
- Planète Enfants & Développement ensures that those making reports will not be at risk of losing their jobs or suffering any harm if they acted in good faith and not under malicious intent.
- Reporters should not conduct investigations themselves, without exception.
- A person who reports false accusations under malicious intent are also subject to appropriate disciplinary measures.

V. MAKE A REPORT

a. Reporting Channels

Planète Enfants & Développement is committed to providing its employees and all those whom it works with safe and accessible ways to report any concerns regarding inappropriate behavior or professional misconduct. All employees, volunteers, administrators, or partners who suspect they have witnessed misconduct or inappropriate behavior are obligated to report it through one of the following ways



OU

whistleblower@planete-eed.org

The reports could be done in any language

b. How do you make a report?

- It is necessary to provide as many details as possible to enable us to take action.
- When reporting, you can choose to remain anonymous. However, if no means of contact or details are provided then it could interfere with the investigation.
- Make a report if there is a suspicion of professional misconduct or if the mistake took place. The suspicion must be reasonably founded.

- No action will be taken against a person who reports a genuine concern that turns out to be a mistake later.
- The people who intentionally raise a concern knowing that it is false may be subject to an investigation and face disciplinary measures.

VI. TREATMENT OF COMPLAINTS AND REPORTS

a. Receipt of the Report

An acknowledgement of receipt will be provided by the CEO or HR manager within one business day of any report. Planète Enfants & Développement will offer support to victims of harm, regardless of if an investigation is being conducted.

b. Implementation of the investigation

Once the report is received, the CEO, HR manager, or a third party will be convened to form a committee in charge of the investigation. These individuals will be required to:

- Watch over the procedure and ensure that it is being conducted as swiftly as possible.
- Speak separately with the victim and the alleged perpetrator of the acts
- Question other people concerned with the investigation separately (such as potential witnesses)
- Decide whether professional misconduct was established.
- Prepare a detailed report mentioning the investigation, the measures taken, the conclusions, and any recommendations

If the actions are established,

- Decide the appropriate follow-up actions.
- Offer the victim, if applicable, psychological support provided by the organization
- Assure that the recommendations are put in place, the behavior has stopped, and the victim is satisfied with the result

c. Confidentiality

Reported information will be shared solely on a strict "need to know" basis. Maintaining confidentiality is in the interest of the reporters, the witnesses, and those who are under investigation. The Investigators cannot share the detailed conclusions or measures taken in order to maintain confidentiality. All people connected with a complaint or a report surrounding professional misconduct or inappropriate behaviors must :

- preserve the dignity and privacy of the people concerned, namely the person who filed the complaint, the subject of the complaint, and the witnesses
- protect the confidentiality of the process, specifically the relative information pertaining to the complaint or the report
- Ensure that all people concerned are treated with humanity, equity, and objectivity

All the information will be managed in accordance with the requirement of relevant data protection laws, including GDPR and the European Union. The Data Privacy Notice informs whistleblowers of their rights surrounding the protection of data, types of data collected, the place and the duration of its storage, and the details on how to access, delete or update the information held.

VII. PREVENTION

Planète Enfants & Développement commits to put in place preventative measures in order to avoid professional misconduct and :

- Promote a harmonious work environment in which all people are treated with respect
- Disseminate this policy in a way that is accessible to all staff as well as, whenever possible, to all who are connected to the organisation, including the beneficiaries of its activities. This policy will be displayed in every office.
- Ensure that all people joining the organization, regardless of contractual status, complete the UNICEF training courses "Prevention of Exploitation and Sexual Abuse" and "Fraud Awareness".
- Ensure that all staff have reviewed the following documents :
 - Code of conduct
 - Charter on the Protection of Children and PSEA
 - Policy concerning harassment and discrimination
 - Anti-corruption Charter

Violating the policies mentioned above may be reported or constitute as misconduct that could lead to a disciplinary action