

CODE OF CONDUCT AND ETHICS DOCUMENT

2026

List of abbreviation

HCA – Hikma Charity Association

SEA – Sexual Exploitation and Abuse

PREFACE

Code of conduct and ethics document, in line with core values of Hikma Charity Association

For the prevention of misconduct, including corruption, fraud, exploitation and abuse, including sexual; and to ensure child safeguarding.

Adherence by all employees, the board members and man, interns, consultants, volunteers, partners and other individuals representing the Association.

This code of conduct and ethics policy document is to be read, understood, signed, observed and integrated into all contracts and agreements in discharging of duties and engagement of the same. The Association is committed to develop and promote standards and best practices in integrity in the work place.

Approved by Hikma Charity Association Board in.....of 2026. It replaces the code of conduct and ethics working policy document of January 2020



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1. INTRODUCTION

Hikma Charity Association (HCA) is a humanitarian Charity Association on the front-line of emergencies, bringing assistance to victims of armed conflicts, natural disasters and extreme exclusion with particular attention to the protection of the most vulnerable people. All HCA staff are representatives of HCA and personally and collectively responsible to uphold and promote the highest standards of ethical and professional conduct in line with HCA mission, beliefs and values.

The rules set forth in the Code of Conduct are intended to promote equality, justice, peace, solidarity and to ensure respect for every human being so as to fulfil HCA' mandate to help all those in need or distress with integrity and credibility.

2. PURPOSE

HCA Code of Conduct is a binding document and forms part of the terms and conditions of employment of all staff.

The standards set out in this Code of Conduct are mandatory and full compliance is expected under all circumstances. In order to confirm their understanding and acceptance of the Code of Conduct, all HCA staff and those engaged directly with HCA activities, are required to sign this document before commencing any assignment or given role.

All staff and those highlighted in this document are obliged to read and fully understand the content of the document and raise any issues they have with their manager or a member of the HR Team.

Any breaches of the standards of the Code of Conduct will be subject to review, investigation, possible disciplinary action, dismissal or even legal action, in line with HCA Disciplinary policy and protection of the name and integrity of the Association

All HCA employees have a duty to report any breach of this Code to their manager or through HCA established reporting mechanisms. HCA staff also have a duty to inform beneficiaries and others with whom HCA is working of the Code of Conduct that HCA staff must adhere to, including how and to whom they can report any misconduct or failure committed by HCA staff and such reports will be treated with discretion and confidentiality under whistle blowing working policy of HCA.

3. CORE VALUES

To uphold and promote the highest ethical and professional standards, staff or HCA representative shall at all times deliver services with integrity, respect, honesty by being accountable, professional, neutral and impartial. Specifically, staff are expected to

- i) Respect and promote fundamental human rights without discrimination and act with integrity.
- ii) Respect and abide by national and international laws.
- iii) Treat all communities HCA assists (including crisis-affected populations, internally displaced persons and refugees), fairly and with respect, courtesy, dignity and according to international laws and standards.
- iv) Positively represent HCA.
- v) Maintain an environment that prevents misconduct and promotes the implementation of this Code of Conduct. Managers at all levels have particular responsibilities to support and develop systems that maintain this environment.
- vi) Promote safe and confidential reporting of serious concerns about suspected misconduct following HCA guidelines.
- vii) Report immediately any knowledge, concerns or substantial suspicions of breaches of this Code of Conduct following HCA guidelines or to her/his line manager. Be aware that failure to disclose or knowingly withholding information about any reports, concerns or substantial suspicions of breaches of this Code of Conduct constitutes grounds for disciplinary measures.
- viii) Cooperate when requested with any investigation into alleged breaches related to this Code of Conduct.

4. PROFESSIONAL CONDUCT

Subject to HCA Constitution and any other applicable law, a member of staff or HCA representative shall take personal responsibility for any actions or omissions arising from the discharge of the duties of office.



What Staff and HCA representatives can expect from HCA:

- i. To match HCA needs with the skills, knowledge, experience and motivation of the staff and HCA representatives.
- ii. To recognize that successful staff and HCA representative's involvement incorporates the individual's motivations, aspirations and choices.
- iii. To ensure that staff understand how to work effectively
- iv. To ensure that staff and HCA representatives receive appropriate information and support to help them deliver in their roles.
- v. To respect staff and HCA representatives, listen and learn from what they have to say, consistently encouraging two-way communication.
- vi. To provide timely and accurate information about HCA work, policies and procedures.
- vii. To foster a friendly and supportive atmosphere - aiming to make staff and HCA representatives enjoyable.
- viii. To make appropriate financial and other provisions in operational planning and budgets which recognize the importance and relevance of staff and HCA representatives.
- ix. To try to resolve fairly any complaints or grievances.
- x. To ensure every staff and HCA representatives has access to a member of staff to guide and advise them.
- xi. To take necessary steps to ensure the health, safety and welfare of staff and HCA representatives whilst undertaking their staff and HCA representatives' activities.
- xii. To celebrate success and recognize loyalty and dedication.
- xiii. If a member of a professional body, observe the ethical and professional requirements of that body;
- xiv. Observe official working hours

What HCA expects from Staff and HCA representatives:

- i. To maintain standards of efficiency, reliability and quality in all aspects of your contribution.
- ii. To treat everyone equally regardless of age, disability, race, religion or belief or sex and encourage others to do likewise.
- iii. To promote, maintain and uphold the reputation of HCA at all times. Avoid social media publishing any information or material that could bring staff or HCA under scrutiny or in conflict.
- iv. To respect the need for confidentiality whenever you have access to privileged information, including, but not limited to matters of a personal nature relating to staff.

- v. To co-operate with staff in line relevant guidelines and remits.
- vi. Be a positive role model as a staff and HCA representative.
- vii. As deemed necessary, support the achievement of HCA 's strategic aims, taking necessary steps to understand relevant plans and policies.
- viii. To take reasonable care of your own health and safety whilst staff and HCA representatives and that of others who may be affected by your actions or omissions.
- ix. To accept that the ultimate responsibility for HCA affairs rests with the paid staff.
- x. To declare any actual or potential conflict of interest as soon as possible, and to work within the law.
- xi. Treat the public and his/her fellow staff with courtesy and respect;
- xii. Observe official working hours and not be absent without proper authorization or reasonable cause;
- xiii. Discharge any professional responsibilities in a professional manner.

5. ANTI-CORRUPTION & ANTI-FRAUD

The Association maintains zero tolerance for:

- **Fraud** - is an intentional act or omission intended to deceive another party that may cause the party to obtain an advantage improperly, avoid an obligation or cause loss to another party. Examples of fraudulent acts include deliberately giving false information in a resume or report, forgery, fabrication of documents or acting under false pretenses.
- **Corruption** - abuse of power for private gain. Corrupt activities are broad and encompass acts such as fraud, theft, bribery, nepotism or favoritism
- **Bribery** - is the offering, promising, giving, accepting, or soliciting of an advantage as an inducement to do something which is illegal or a breach of trust. The purpose of the bribe is to 'induce a person to perform a relevant function or activity improperly or to 'reward a person for the improper performance of such a function or activity. Bribery includes facilitation payments, favors and kickbacks.
- **Embezzlement** - is where one dishonestly takes or uses property belonging to another, without consent and with the intention of permanently depriving the other of it. An example could be deliberate refusal to return HCA assets after leaving.
- **Misuse of funds** - unauthorized or improper use of money or assets by an individual who has been entrusted with their management or control



- **Facilitation payments** - small, unofficial payments made to secure or expedite a routine administrative task.
- **Kickbacks** - payments made in return for a business favor or advantage

Staff and HCA representatives are committed to preventing and identifying fraud and corruption in their programs, through raising awareness of fraud risks, implementing controls aimed at preventing and detecting fraud and corruption, and enforcing this policy.

Staff and HCA representatives will therefore implement the following preventive measures, therefore, implements the following pillars of prevention.

Top-level commitment – the board, management, Staff and HCA representatives commit to this zero-tolerance policy and the implementation of adequate controls to safeguard HCA representatives’ assets, stocks and funds from abuse.

Risk assessment – Staff and HCA representatives will adopt a risk-based approach to tackling fraud and corruption in the programs. The risk of fraud and corruption in programs will be identified, communicated to relevant stakeholders with an assessment of risk mitigation.

The risk of fraud and corruption will be considered during the design of programs.

It will be monitored and reported as part of HCA risk management framework. HCA will put in place procedures that are effective and proportionate to the risks identified and their circumstances and culture. These procedures will include those designed to prevent and detect the risk of fraud.

Due diligence and procedures for third parties – HCA shall employ a comparable process for third parties before entering contracts. The level of due diligence will be based on risk and will be done in line with Staff and HCA representatives’ and this policy document.

Communication, awareness and training – Staff and HCA representatives will employ a vigorous continuous system of building awareness and understanding of its anti-fraud and anti-corruption procedures and systems. New staff will be inducted into the policy.

Third parties will be informed of the expectations laid out in this policy as part of their contractual conditions on case by case basis

Monitoring and evaluation – Staff and HCA representatives shall monitor the effectiveness of the procedures set to combat fraud and corruption; with constant review from time to time.

Roles and responsibilities

All staff must:

- i. Read, understand, and comply with the contents of this policy.
- ii. Must not be involved in corruption and fraud
- iii. Must not offer advantages of any kind not manipulate processes
- iv. Report suspicions of fraud and corruption promptly.
- v. Exercise their duty to prevent and detect fraud and corruption.

All CEO, program leads and managers must

- i. Ensure staff and third parties they work with are aware of the contents of this policy.
- ii. Vigilantly monitor and regularly review and where necessary, updated controls and procedures to safeguard HCA assets, funds, and stocks.
- iii. Frequently check that these are procedures are being fully observed and implemented

6. CONFLICT OF INTEREST

A potential conflict of interest arises when a director, officer or key person, or that person's relation or business

- i. stands to gain financial benefit from an action HCA takes or a transaction into which it enters; or
- ii. has another interest that impairs, or could be seen to impair, the independence or objectivity of the director, officer or key person in discharging their duties.

The following are Potential conflicts of interest but not limited to:

It is impossible to list all the possible circumstances that could present conflicts of interest. A situation where a board member, staff or key person or their relations or business:

- i. has an ownership or investment interest in any third party that HCA deals with or is considering dealing with;
- ii. receives or may receive compensation or other benefits in connection with a transaction into which HCA enters;
- iii. receives or may receive personal gifts or loans from third parties dealing with HCA;



- iv. serves on the board of directors of another nonprofit organization that is competing HCA for a grant or contract.
- v. has a close personal or business relationship with a participant in a transaction being considered by HCA;
- vi. would like to pursue a transaction being considered by HCA for their personal benefit.

Determining Whether a Conflict of Interest Exists

- i. After disclosure, the concerned party and the committee will determine whether there is a conflict of interest or not. This is after thorough investigation with proof has been conducted. The suspected party is not to decide or vote on whether the matter is considered a conflict of interest or not.
- ii. The committee is charged with the determination or conclusion on potential conflict through assessment of documents presented as breach of policy as per the signed form that highlighted the matter.

Conflict of Interest Disclosure Form

Date: _____

Name: _____

Position (employee/volunteer/board member): _____

Please describe below any relationships, transactions, positions you hold (volunteer or otherwise), or circumstances that you believe could contribute to a conflict of interest between HCA and your personal interests, financial or otherwise: _____

I have no conflict of interest to report _____

I have the following conflict of interest to report (please provide details and insert additional pages where necessary)

1. _____
2. _____
3. _____

I hereby certify that the information set forth above is true and complete to the best of my knowledge (having made reasonable enquiries). I have reviewed, and agree to abide by, the HCA Conflict of Interest Policy.



7. SAFEGUARDING & PROTECTION

Sexually harassment, abuse or exploitation willing or unwilling includes but not limited to

- i. requesting for sexual activity or favors to beneficiaries, staff or members of the public;
- ii. Making intentional or careless physical contact/touch that is sexual in nature;
- iii. Making gestures, noises, jokes or comments about someone's physical body
- iv. Forcing a beneficiary or member of public into sexual act without their consent and for children with or without their consent
- v. as defined from time to time by the organization or government

The Association has zero tolerance for

- i. Sexual exploitation and abuse (SEA)
- ii. Sexual harassment
- iii. Child abuse
- iv. Gender-based violence
- v. Exploitation of vulnerable persons

Therefore, based on these, staff must not:

- i. engage in sexual relationships with beneficiaries
- ii. exchange assistance for favors
- iii. Immediately report concerns to line leads or managers

Failure to report may result in disciplinary action.

8. NON-DISCRIMINATION & EQUALITY

HCA recognizes that all persons must be treated equally regardless of gender, clan, religion, disability, age, political affiliation.

- i. HCA does not and shall not discriminate based on race, color, religion (creed), gender, age, national origin (ancestry), disability, marital status, political affiliation or military status, in any of its activities or operations. These activities include, but are not limited to, the



- appointment to and termination from its Board, hiring and firing of staff or contractors, selection of volunteers, partners, beneficiaries and service provision.
- ii. HCA is an equal opportunity employer and shall not discriminate in employment, recruitment, Board membership, advertisements for employment, compensation, termination, upgrading, promotions, and other conditions of employment against any employee or job applicant on the basis of race, color, religion (creed), gender, age, national origin (ancestry), disability, marital status, or military status, or for any other discriminatory reason.
 - iii. Any staff involved in discrimination will be liable to disciplinary action.

9. CONFIDENTIALITY

HCA is committed to keeping data secure and confidential.

This is by:

- i. Ensuring that all personal data collected and processed, including donors, employees, potential employees, board members, temporary staff, volunteers, grantees, partners, contractors, consultants, suppliers and any and all third parties, is managed appropriately and in compliance with the Data Protection Law of.....
- ii. Ensuring all unauthorized or unlawful processing, loss, transfer, destruction of or damage to data (personal data breaches) are swiftly identified and reported.
- iii. Ensuring security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organizational measures ('integrity and confidentiality')."

Use of personal information

HCA collects elements of personal data when any of the following things happen:

- i. One visits HCA website or interact on social media
- ii. One makes a one-off donation or sign up as a regular giver
- iii. One registers to receive updates from HCA
- iv. One registers for or attend a HCA event
- v. One contacts HCA by email, telephone, letter or through the website.



Collection and use of Personal Data Information by HCA

HCA collects and uses personal data for the following reasons:

- i. To process one's donations and comply with donation-related instructions
- ii. To facilitate media and online engagement
- iii. To conduct due diligence for staff, beneficiaries and partners
- iv. To provide service delivery to beneficiaries, partners and staff
- v. To respond to complaints, queries or actions that need to be taken from time to time
- vi. To keep one informed about our activities and ways to support us
 - i. To deal with any queries or requests one may have
 - ii. To send confirmation of donations and event registrations
 - iii. To improve how we do things, informed by one's feedback to us.

10. USE OF ASSOCIATIONAL RESOURCES

All property maintained by HCA is kept in the best possible working condition and to ensure proper use of such property and HCA networks.

“Property,” as the term is used in this policy, is defined as any piece of equipment, furnishing, vehicle, building or supply leased, owned, donated or otherwise in the custodial care of HCA or any person acting as its agent.

No HCA employee should expect any privacy on HCA premises or when using HCA property or networks, except that which is required by law.

General Guidelines on the Use of Company Property

- i. All HCA employees must maintain their work environment in an orderly fashion and follow all HCA rules for proper use and maintenance.
- ii. Any employee who is found to have neglected or misused HCA property will be subject to disciplinary action up to and including termination as when deemed necessary.
- iii. Should an employee damage one of HCA property, HCA reserves the right to require the employee to pay all or part of the cost to repair or replace the property.
- iv. Misappropriation of HCA property is grounds for immediate termination and possible criminal action.



- v. No employee may use HCA property (including but not limited to computers, telephones, cellphones, copiers, faxes, Internet services and printers) for personal use unless specific permission has been granted by the employee's department head.
- vi. Should permission be granted, the employee will be responsible for the care and return of the loaned property. Special care should be taken to identify any concerns regarding its condition before the property is removed or used by the employee for personal use.

Use of Company Vehicles

- i. Any employee for whom driving is an essential job duty must be authorized and approved to drive HCA vehicles.
- ii. It is the responsibility of the driver of a HCA vehicle to ensure that the vehicle is in full operational condition before each use.
- iii. The driver will sign a vehicle log report noting any problems with, or damage to, the vehicle before each use.
- iv. The log book will be used as a support document in case the vehicle is returned damaged. Any vehicle found to be unsafe will be removed from the operational fleet until appropriate maintenance or repairs have occurred.

11. MEDIA & PUBLIC REPRESENTATION

Use and Dissemination of Company Information

“Information,” in this policy, includes without limitation any information owned or used by HCA, such as:

1. Any staff, board member, beneficiary or partner.
2. Any database information, including emails, addresses and telephone numbers of staff, beneficiaries, board members, partners or donors.
3. Any photographs, videotapes and sound clips of any HCA employee, donor, beneficiary or partner.

Media Representation

- i. Only staff who are authorized by HCA's board members or executive team, or whose job description permits them to do so, may speak on behalf of HCA.



- ii. Specific permission from the HCA's board or executive team will be required before any HCA employee may disseminate confidential HCA information.
- iii. No employee may knowingly dispense such information to any outside party unless authorization has been granted. This could include other staff who do not have the right to know such information.
- iv. Any breach will be considered a violation of HCA policy concerning confidentiality, and it may constitute a violation of state or federal law.

Monitoring of Network Communications

- i. HCA reserves the right to monitor any communications that use HCA networks in any way, including data, voice mail, email, telephone logs, Internet use, to determine proper use.
- ii. HCA will review and analyze network communications activity and patterns. HCA may choose to publish these data for purposes of maintaining this policy.
- iii. No employee may knowingly disable or hack any network software or system identified as a monitoring tool.

12. POLITICAL & RELIGIOUS NEUTRALITY

HCA promotes a diverse, inclusive and equal workplace both internally and externally. Every employee is expected to treat everyone with whom they have contact with dignity, courtesy and respect.

The Association operates with neutrality and impartiality. It hires, promotes and rewards employees based on their capabilities and skills. Gender, race, color, ethnic or national origins, marital status, family circumstances, age, disability, political or religious belief are not relevant to personal and team performance at work.

Employees have the right to work in a safe environment free from discrimination, bullying or harassment.

HCA supports and upholds human rights principles and international standards. The association will not tolerate, engage in or support the use of, forced or child labor. This expectation extends to all board and executive members, staff and partners.

Therefore, staff **must not** be involved in the following:

- i. Use the Association for political campaigning



- ii. Promote political agendas during official duties
- iii. Engage in activities that compromise neutrality

Any staff in breach of this will be liable to disciplinary action

13. REPORTING MISCONDUCT (WHISTLEBLOWING)

Reporting of Suspicions/Whistleblowing

It is mandatory for all Staff and HCA representatives' staff to report suspicions of fraud or corruption immediately.

Suspicions must be reasonably held but do not require any proof before making a report. This can be reported through the following channels:

- i. first report suspicions to the manager who holds their contracts.
- ii. Should the staff feel, the line manager might be involved or will not take the suspicion seriously, they should report it directly to manager.
- iii. Once a manager receives a fraud suspicion, they will be required to report it to the next level manager not later than 48 hours. They may, however, report it to the Executive Director should the manager be involved.
- iv. If the Executive Director is involved, then the report must be made to the Chair of the Board. Staff and HCA representatives' staff and any third party may also report suspicions directly by sending an email to the persons responsible as per the above laid out channels.

Whistleblowers shall be protected from retaliation.

15. DISCIPLINARY ACTION

Complaints and disciplinary procedures

A complaint can be submitted via email, letter or telephone or in person.

Complaints should preferably be submitted by email to For further information on how to complain, consult

- a) If a staff member purposely makes false or misleading allegations on any action by another staff, this is considered misconduct and will be subject to disciplinary action at the discretion of the employer.

Non-retaliation and confidentiality

- i. Stakeholders must be able to lodge their concerns without fear of reprisals or unfair treatment. HCA will do its best to ensure that complaints are handled with confidentiality and without risking on employment or any form of reprisals and/or harassment.
- ii. Confidentiality is crucial to achieving satisfactory results, as it protects the complainant, the subject of the complaint and other witnesses. The nature of the complaints, the identities of those involved and documentation from the investigation are to be kept and remain confidential. They can only share when need arises for necessary administrative investigations and decisions.

Disciplinary measures.

Any upheld breach of this Code of Conduct, in accordance with relevant legislation, lead to internal disciplinary actions, dismissal or even criminal prosecution. This affects both the staff and HCA.

Should HCA fail to fulfil an undertaking, action may be taken under the applicable agreement. If it emerges that an HCA's staff is in breach of any aspect of this Code of Conduct, HCA will enter into dialogue with the member and follow up on how the member deals with this.

The following measures, in their order, will be undertaken during a disciplinary action:

- i. Verbal warning
- ii. Written warning
- iii. Suspension
- iv. Termination
- v. Legal action (if required)

It is important to note that upon investigation, one caught having been in a serious misconduct (e.g., fraud, abuse, corruption) may be immediately dismissed.



16. IMPLEMENTATION

HCA will undertake to disseminate the Code of Ethics through appropriate communication activities. HCA will ensure the following are undertaken through:

- i. Regular training of all staff on the principles of the Code of ethics
- ii. Monitoring compliance with the principles of the Code of Ethics
- iii. Review and participate of the Code of Ethics every two years or as when deemed necessary
- iv. Communication channels for internal and external messages on the implementation of this policy

Implementation plan for the Code of Conduct:

- i. **Recruitment:** All staff members are required to sign the Code upon hiring.
- ii. **Training:** Regular training sessions regarding ethics and safeguarding will be conducted for staff.
- iii. **Review Process:** The Code will undergo a review every two years.

17. ACKNOWLEDGEMENT

I, _____, confirm that I have read and understood the Code of Conduct & Ethics of Hikma Charity Association Somalia and agree to comply with its provisions.

Signed _____ on _____ This _____ day, _____ 1st _____ January _____ 2026

