

ETHICAL CODE OF CONDUCT INCL. PSHEA & CHILD LABOUR



1. Purpose and Scope

The present Ethical Code of Conduct outlines what is considered unethical conduct in Forests of the World's (FoW) internal and extended working environment, and how to address it as both a complainant and responsible organisation. As such, it informs staff and external partners of what behaviour is expected of them, as FoW representatives and in their collaboration with Forests of the World, and the consequences of not respecting the integrity of others.

Forests of the World defines bullying, discrimination, harassment, exploitation and abuse – sexualised or otherwise – within and outside the workplace through any medium unethical conduct.

This document is covered by the FoW General Code of Conduct Framework.

2. Definitions

Bullying is repeated, persistent, unreasonable behaviour by one or more people, directed towards a worker, or a group of employees, that creates a risk to their health and safety. This can include a range of behaviours over time. Bullying can be carried out verbally, physically or in writing (e.g. via email, internet chat rooms, instant messaging and mobile phone technologies such as text messaging). Bullying can be directed in a range of ways in a workplace –downwards (from management level to employees), sideways (between colleagues) and upwards (from employees to management level).

Discrimination refers to when someone is treated unfairly because they belong to a particular group of people or have a particular characteristic. Discrimination may be direct or indirect. Discrimination can occur where persons or groups of people in an identical situation are treated differently, and where persons or groups of people in different situations are treated identically. Direct discrimination occurs, when an individual is treated less favourably by comparison to others in a similar situation, and the differential treatment is due to one or multiple protected characteristics.

Harassment is unwelcome or unreciprocated behaviour, which makes a person feel intimidated, offended, or belittled in the workplace. Harassment based on sex, race, or disability is also unlawful under many national laws, and harassment such as physical assault can be a criminal offence.

Sexual harassment is unwelcome conduct of a sexual nature, which offends, humiliates or intimidates the person at which it is directed, regardless of intent. Sexual harassment may occur in a single incident, as well as a series of incidents. The harassment may be subtle and implicit, rather than explicit. This behaviour frequently involves an abuse of power and/or trust and is often directed at a person, who is unable to stop the behaviour easily or without repercussions. The behaviour may occur at or outside the workplace at workplace-related functions. The respective genders of the two parties are not relevant.

Sexual exploitation is understood as any actual or attempted abuse of position of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.

Sexual abuse is understood as an actual or threatened physical intrusion of a sexualised nature, whether by force or under unequal or coercive conditions.

Child labour is understood as work that deprives children of their childhood, potential and dignity, and that is harmful to their physical or mental development. It refers to work which is mentally, physically, socially or morally dangerous and harmful to children, and/or interferes with their schooling by depriving them of the opportunity to attend school, obliging them to leave school prematurely, or requiring them to combine school attendance with excessively long and heavy work. Forests of the World follows the definitions and age thresholds established by the International Labour Organization (ILO) Conventions No. 138 (Minimum Age) and No. 182 (Worst Forms of Child Labour).

3. Coverage

This Ethical Code of Conduct applies to all FoW staff members – whether full time, part time, or engaged on fixed-term contracts – at any and all offices and

working locations of FoW. All persons receiving their salaries directly from FoW are considered FoW staff.

It also applies to other representatives working with FoW, including (but not limited to) volunteers (including board members), consultants, contractors, suppliers, vendors, interns, visitors (e.g. donors), dependents accompanying staff while working for FoW, and other individuals acting as representatives of FoW.

All staff and representatives named above can raise a complaint via the procedures outlined in the [Feedback and Complaint Mechanism](#), and may be subjects of complaints and investigations covered by this as a function of their association with FoW.

Partner organisations, their staff and their staff's conduct towards third parties are likewise covered by the Ethical Code of Conduct, and both partner staff and third parties may report incidents of unethical conduct directly to either their own management or FoW staff. While FoW does not have the mandate to dictate procedures for handling complaints internally in partner organisations, FoW will hold such organisations to a commitment of dealing with any incoming complaints in a satisfactory manner proportionate to the seriousness of complaints, and FoW will employ countermeasures or repercussions towards the partner organisation, if reactions are not deemed adequate.

4. Conduct Covered

Conduct unacceptable to Forests of the World and thus subject to complaints and potentially various degrees of repercussions and sanctions include (but are not necessarily limited to):

- Bullying
- Discrimination
- Harassment, including sexual harassment
- Exploitation, including sexual exploitation
- Abuse, including sexual abuse
- Buying sexual services
- Child Labour
- Corruption (See FoW Anti-Corruption Code of Conduct)

- Conflicts of Interest (See FoW Conflict of Interest Code of Conduct)

As part of this, it is emphasised that the likely sanction for staff and other representatives engaging in any kind of sexual activity with minors (defined as anyone under the age of 18, or older if the local law indicates this) is dismissal, and will also likely result in FoW filing a police report. Mistaken belief of age will not be considered any defence. This is also the case if staff or other representatives from FoW are found to engage in or promote any form of abusive, exploitative or harmful behaviour towards minors. Dismissal is also the likely consequence of FoW staff or representatives engaging in any form of sexual activity with rights holders or adults at-risk with whom FoW or partners are involved, or any form of abusive, exploitative or harmful behaviour towards these. It is considered an aggravating circumstance if any of the above transgressions befall the rights holders and communities, which hold us in trust, or to adults at particular risk.

5. Forest of the World's Values and Commitment

All people are entitled to a life without bullying, discrimination, harassment, exploitation or abuse. FoW is committed to avoiding any form of bullying, discrimination, harassment, exploitation and abuse (including child abuse and adults at-risk abuse) and responding robustly, when these harms take place. FoW views any form of sexual violence as a gross violation of human rights. FoW does not tolerate sexual harassment, exploitation or abuse, whether internally or externally, and we will not tolerate our staff or other FoW representatives carrying out any form of sexual harassment, exploitation or abuse towards anyone we come into contact with through our work. FoW is committed to ensuring that all allegations of sexual harassment, exploitation and abuse and similar concerns are responded to in a timely, robust, and considerate manner.

As an organisation and a workplace, we are thus committed to ensuring a working environment in which respect for human rights and dignity can thrive, and in which no one is exposed to any form of bullying, discrimination, harassment, exploitation or abuse. At FoW, everyone is obliged to help develop and maintain an open and safe working environment. FoW's management is

responsible for ensuring an enabling framework to do so, and for continuously incorporating lessons relevant to improving the framework and this document.

Moreover, FoW acknowledges that people reporting irregularities or suspicions of abuse or unethical conduct may be under great pressure. Providing information about unacceptable circumstances should be a safe alternative to not providing information. FoW will therefore ensure that complainants and whistle-blowers can inform FoW as easily as possible, and to the extent possible, FoW will protect whistle-blowers against reprisals from the organisation or persons they report on, e.g. their employer or others they might depend on. FoW will therefore protect the identity of a whistle-blower, and make every effort to prevent retaliation.

6. Preventive Action

FoW's management ensures that all individuals representing FoW know their responsibilities and rights, as well as what is considered unethical conduct and the potential consequences of such. Introducing this Ethical Code of Conduct is a natural element when recruiting or onboarding new employees or volunteers, as well as when outposting staff. Also, behavioural aspects of the working environment are included in FoW's regular workplace assessments (APVs), and concerns, results and reflections can be raised by both employees and managers at annual performance and development interviews (MUS), and management performance and development interviews (LUS).

FoW actively communicates our guidelines on safeguarding against bullying, discrimination, harassment, sexual exploitation, abuse of power and child labour, and ensures that all partners are aware that we maintain a zero-tolerance policy towards bullying, discrimination, harassment, exploitation, abuse and child labour. To this purpose, policies on ethical conduct are part and parcel of agreements and contracts with partner organisations, and violation of our guidelines for safeguarding can result in immediate termination of agreements. If incidents include illegal as well as unethical conduct, FoW will also file a police report for further investigation by appropriate authorities.

Anonymised statistics (number and types of complaints) will form the basis for an annual review, lessons will be derived from an analysis of these and used to assess and improve the adequacy of this document.

7. Responsibility

FoW’s Secretary General and Board hold overall accountability for this document and its implementation. They are responsible for ensuring this document is reviewed and updated every year, based on lessons learned.

As part of the FoW working culture, we consider it the duty of the individual to react to matters that violate our ethical principles, and FoW staff and representatives are obliged to report any such breaches.

8. Feedback and Complaints

This Code of Conduct is covered by FoW’s [Feedback and Complaint Handling Mechanism](#). Feedback and complaints can be submitted to FoW through various channels as described on our website and in the above mentioned document.

9. Review

This document will be reviewed every year or more frequently, if necessary.

Date for latest update	Changes made	Responsible
February 2021	First version adopted	
February 2024	Minor changes	ANH
August 2024	Inclusion of child labour and ref. To Conflict of Interest	KL
November 2025	Layout	KSK