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## CODE OF CONDUCT

### **PURPOSE AND SCOPE**

When employed or representing Östgruppen, you must follow the Code of Conduct to optimize the safety and security of Östgruppen and its staff and partners. This Code of Conduct guides the norms, attitudes, values, behavior and practices of Östgruppen to ensure that the organization complies with all laws and regulations. It ensures that Östgruppen has a common understanding of our norms, attitudes, values and behaviors within the organization.

The Code of Conduct applies to all board members, employees, interns, volunteers, consultants and anyone else who at any time represents Östgruppen in any capacity, hereinafter commonly referred to as "staff". It applies at all times and must be followed for the duration of the service, employment or assignment.

### **GUIDING PRINCIPLES AND GENERAL PRECONDITIONS**

Östgruppen is founded on the principles of the rights-based approach participation, non-discrimination, equal opportunity, and democratic organisational structures. We are guided by these values and a vision of full respect for universal human rights and democratic values. As staff you are required to respect and comply with decisions taken within the organisation. You must always adhere to internal policies and regulations.

As staff your actions may affect the reputation and accountability of Östgruppen on and off duty. In order to protect and uphold the dignity and integrity of all staff and rights holders, staff must never engage in any form of activity that can be directly harmful to the organisation and its staff, or that may harm the reputation of the organization and its project partners. In representing Östgruppen you work to

promote and defend human rights and democratic values together in cooperation with organisations and associations who share our values.

Never use information you may obtain as staff, for any purposes other than for which it is disclosed. Slander is not tolerated and will render disciplinary action. Östgruppen maintains a strictly neutral profile in party politics and religious matters, therefore you shall never promote party political or religious views while on duty. You are never allowed to use the Östgruppen brand in party political or religious matters. You must always comply with Swedish law and international conventions for human rights.

### **ABUSE OF POWER**

You must never take advantage of your position in order to gain benefits for yourself or another person. Ensure that your behavior cannot be understood as if you expect favours or benefits of any kind. Corruption is defined as abuse of entrusted power for illegitimate individual or group benefit. Be aware that situations of unequal power will arise when representing Östgruppen. Understand that situations may change or evolve and will be perceived differently among those involved. Always be aware of risk of power abuse or potential conflict of interests when engaging in a personal, consensual relationship with staff at Östgruppen, staff at partner organisations or any person in the immediate professional network. Staff must always declare conflict of interests in any human resource process and if there are any conflict of interest with partner organisations.

### **SEXUAL EXPLOITATION AND ABUSE**

All forms of sexual exploitation and abuse are strictly prohibited. Sexual exploitation is defined as actual or attempted abuse of a position of vulnerability, 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 defined as actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions. Purchase of sexual services are prohibited, regardless of national laws. You are not permitted to receive sexual services in exchange for other services or favours. Visits to pornographic clubs, striptease clubs and similar clubs are prohibited. Sexual exploitation and abuse by staff constitute acts of gross misconduct and are grounds for immediate termination of contract.

### **SEXUAL HARASSMENT**

Östgruppen has a zero-tolerance against sexual harassment. Sexual harassment is defined as any unwelcome sexual advance, request for sexual favour, verbal or physical conduct or gesture of a sexual nature, or any other behaviour of a sexual nature that might reasonably be expected or be perceived to cause offence or humiliation to another, when such conduct interferes with work, is made a condition of employment or creates an intimidating, hostile or offensive work environment. It can take the form of a single incident, but typically it involves a pattern of behaviour. Such behaviour will result in disciplinary measures, is a reason for immediate termination of employment. If there are any reasons to suspect that a criminal offence has been committed, an incident will be reported to the Swedish authorities.

### **PORNOGRAPHY**

All forms of pornographic material are strictly prohibited. Never use technical equipment including computers, phones, cameras that the organization provides for work to consume or disseminate pornographic material. This includes equipment that is provided to you by a third party, when the purpose of the provision is to work within a project funded by and/or related to Östgruppen. Any kind of consumption of child pornography is prohibited and will be reported to Swedish authorities.

### **UNETHICAL BUSINESS PRACTICES**

Östgruppen has a zero-tolerance against corruption and fraud, regulated in the Anti-Corruption. Failure to adhere to the policy will be investigated and can result in termination of contract and may be reported to the authorities in the country in which the incident takes place and in the individual's country of origin. Always follow transparent, accountable and honest practices at all times when dealing with money, goods, services or likewise. Never use or accept bribes or favours in any form to secure contracts or services. Follow established regulations when purchasing goods and/or services, as stated in the Procurement Policy. Staff may never accept gifts from rights holder and/or partner organisations. Gifts can be (but are not limited to) material goods, services, travel, entertainment, and more. Staff may accept a token gift from representatives of partner organisations, in respect of national and local traditions and conventional hospitality. Typical minor token gifts are chocolate, candy or merchandise promoting an organization, such as t-shirts, books and pens are exempted from the general rule. Ensure, where possible, that goods purchased are

produced and delivered under conditions that do not involve the abuse or exploitation of anyone.

### **COMPETING ACTIVITIES**

You must not carry out work or activities that directly or indirectly compete with Östgruppen or undertake assignments or activities that can affect your work negatively. If you intend to undertake an assignment or a spare time job of a more extensive nature, you shall consult with your immediate manager before doing so.

### **ORGANISED CRIME**

Avoid all forms of contact with organised crime. Be aware of organised crime and its forms and ensure that you are not participating in organised crime by ensuring the authenticity of all purchases and trades. You should be aware of different forms of trafficking (trade with people) and be aware of its presence.

### **ALCOHOL AND NARCOTICS**

Östgruppen has a restrictive approach to alcohol and the consumption of alcohol. During work hours, consumption of alcohol by employees or similar is only permitted in exceptional cases like official dinners and similar events or in other situation where the use of alcohol is expected. Alcohol consumption must in such circumstances be modest so as not to affect the work or jeopardise the reputation of Östgruppen. Always avoid all forms of involvement or contact with substances classified as narcotics. If substances classified as narcotics are needed for medical reasons you need to be able to show prescriptions and recommendations from a legitimised doctor. Consumption of any alcohol or narcotic substances before or during driving is prohibited, regardless of national laws.

### **VIOLATIONS**

Violations of this Code of Conduct will lead to disciplinary actions, termination of employment or criminal prosecution. Östgruppen encourages staff and project partners to speak out when witnessing or suspecting violations of Code of Conduct. Disclose information you may have regarding suspected cases of violations of the Code of Conduct to your immediate manager.

### **OTHER DOCUMENTS OF RELEVANCE**

The following policies and guidance documents complement the Code of Conduct:

Östgruppens Code of conduct  
Revised and adopted by board decision, 2025.02.03

- HR policy
- Equal treatment policy
- work environment policy
- The anti-corruption policy

### REVISION HISTORY

- The Code of Conduct was adopted by the board on 2025-02-03

### SIGNATURE

I hereby confirm that I have read and understand the Code of Conduct and that I commit to follow it during my time as staff at Östgruppen.

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Date

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Signature

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Name