

1 INTRODUCTIE

International Justice Mission Nederland bestaat om een stem te zijn voor slachtoffers van slavernij & geweld wereldwijd. Om zo ons land te bewegen zich vol in te zetten voor gerechtigheid. Integriteit ligt daarmee aan de kern van onze missie.

In de goede doelen sector worden terecht hoge eisen aan organisaties gesteld om onethisch handelen te voorkomen en op te treden wanneer dit onverhoopt toch plaats vindt. In dit document staat beschreven hoe wij hier als IJM Nederland invulling aan geven.

1.1 Opzet Integriteitsbeleid

De gedragscode vormt de basis van ons integriteitsbeleid. Daarin staat beschreven hoe medewerkers van IJM en daarmee ook de organisatie zich behoren te gedragen. Aanvullend hierop zijn processen en afspraken vastgelegd om te borgen dat de gedragscode zich vertaalt naar de praktijk van ons handelen en dat er wordt ingegrepen bij misstanden. Wij volgen hierbij de Handreiking Integriteitssysteem van brancheorganisatie Partos. In hoofdstuk 3 staat het preventief beleid beschreven, gevolgd door het repressieve apparaat in hoofdstuk 4. Gezamenlijk vormen deze twee delen de handhavingspraktijk.

1.2 Rolverdeling

In het integriteitsbeleid staan rollen en verantwoordelijkheden toegelicht. Per november 2023 zijn deze rollen als volgt ingevuld:

Directeur:	Carolyn Houmes
Integriteitsfunctionaris:	Chelsea van de Ridder
Vertrouwenspersoon 1:	Henk Jan Kamsteeg
Vertrouwenspersoon 2:	Henriette van der Maaten - Dunnewind

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3 PREVENTIEF BELEID

3.1 Gedragscode

International Justice Mission wil iedere integriteitsschending voorkomen. Het beginsel hierbij is dat medewerkers weten wat er van hen verwacht wordt. Schendingen kunnen namelijk voortkomen uit kwade wil, maar ook uit onwetendheid en onkunde.

Van alle medewerkers (inclusief bestuursleden en vaste vrijwilligers) wordt daarom gevraagd zich vertrouwd te maken met de gedragscode en deze te ondertekenen. Daarnaast wordt dit terugkerend onder de aandacht gebracht zoals toegelicht in het moreel leerproces. Wij zijn ons bewust dat integer handelen zich niet beperkt tot de expliciete normen die in dit document staan beschreven. Daarom wordt van medewerkers verwacht dat zij altijd handelen in lijn met de missie, visie en waarden van de organisatie. Deze elementen zijn opgenomen in de gedragscode welke te vinden is in de bijlage van dit document.

3.2 Wervingsbeleid

Het handelen van de organisatie wordt bepaald door het handelen van haar medewerkers. Het personeelsbeleid is daarom van groot belang voor het integriteitsbeleid. In het wervingsproces is daarom bepaald dat nieuwe medewerkers tenminste 2 referenties en een verklaring omtrent gedrag moeten kunnen overleggen.

3.3 Preventieve werking meldsysteem

Een goed functionerend meldsysteem heeft ook een preventieve functie. Wanneer betrokkenen zien dat meldingen serieus worden opgepakt en normen worden gehandhaafd zal de kans op schendingen afnemen. Het vertrouwen van medewerkers in het meldsysteem is daarom van groot belang en wordt periodiek anoniem geëvalueerd.

3.4 Risicoanalyse en preventie

IJM Nederland heeft een goed functionerend systeem van risicomanagement. Uitgaande van de doelstellingen van IJM NL worden de risico's geïdentificeerd en beheersingsmaatregelen vastgesteld. Hiertoe is een Risico Register opgesteld. Elk kwartaal houdt het leiderschapsteam een risico-assessment en maakt hier verslag van op. Significante risico's worden gedeeld met de Raad van Toezicht.

Risicoanalyses kunnen gericht zijn op processen of op schendingen. In het eerste geval wordt een enkel proces doorgelicht met het oog op de risico's op alle mogelijke schendingen. In het tweede geval worden alle processen doorgelicht met het oog op de risico's op een specifieke schending. Voor de processen die wij als kwetsbaar beschouwen, zijn preventieve maatregelen ingericht. Voorbeelden hiervan zijn dubbele autorisaties om fraude in het betalingsproces te voorkomen en een jaarlijks opgaaf van potentiële belangenverstrengeling door medewerkers.

3.5 Aanvullende richtlijnen

Er zijn ook risico's die betrekking hebben op specifieke schendingen zoals discriminatie en seksueel grensoverschrijdend gedrag. Deze risico's, de bijbehorende normen en de gevolgen van overtredingen worden expliciet besproken met medewerkers en staan uitgewerkt in beleidsstukken, waaronder:

- Anti-Harrassment and Nondiscrimination Policy
- Safeguarding Policy
- Bribery and Extortion Policy
- Confidentiality Policy
- Conflict of Interest Policy
- Data Safeguarding Policy
- Whistleblower Policy

Deze beleidsstukken zijn op aanvraag beschikbaar.

3.6 Externe richtlijnen

IJM onderschrijft de volgende gedragscodes en richtlijnen:

- Erkenningsregeling Goede Doelen
- Regeling beloning directeuren van goede doelenorganisaties
- RJ 650 richtlijn voor verslaglegging t.b.v. de jaarrekening en het jaarverslag
- SBF-code voor Goed Bestuur
- Richtlijn Financieel Beheer Goede Doelen
- Handreiking verwerking en waardering van nalatenschappen belast met (vrucht)gebruik.

4 HET REPRESSIEVE APPARAAT

4.1 Handhaving

IJM Nederland zal zich maximaal inspannen om te waarborgen dat er integer gehandeld wordt. Toch kunnen zich situaties voordoen waarbij dit niet het geval is. Het repressieve apparaat beschrijft hoe dergelijke situaties bekend gemaakt kunnen worden (het meldsysteem) en hoe dit opgevolgd wordt (disciplinair onderzoek).

4.2 Interne meldsysteem

Het interne meldsysteem van IJM Nederland biedt meerdere routes aan medewerkers en vrijwilligers om melding te doen van een integriteitsschending. Hiermee trachten wij de drempel voor een melding te verlagen en de afhankelijkheid van een enkele functionaris te beperken.

4.2.1 Vertrouwenspersoon

De vertrouwenspersoon geldt als voorportaal van het interne meldsysteem. De vertrouwenspersoon heeft de taak om medewerkers die getuige of slachtoffer waren van een integriteitsschending bij te staan. De gesprekken met de vertrouwenspersoon zijn strikt vertrouwelijk. Het gaat er in de eerste plaats om dat de betrokken medewerker zijn verhaal kwijt kan. Vervolgens moet in het gesprek verhelderd worden in hoeverre er sprake is van een integriteitsschending en vervolgens wat de beste vervolgstappen zijn.

Voor de vertrouwenspersoon hanteert IJM Nederland de volgende afspraken:

- Er moet zowel een mannelijk als een vrouwelijk vertrouwenspersoon beschikbaar zijn
- De vertrouwenspersoon kan niet zelf onderdeel zijn van het bestuur van de stichting

4.2.1.1 Taken en bevoegdheden vertrouwenspersoon

Een medewerker kan zelf, zonder de leidinggevende in te lichten, de vertrouwenspersoon inschakelen. Samen bekijken ze het probleem, bespreken ze wat de medewerker zelf al heeft ondernomen en bepalen mogelijke vervolgstappen. De vertrouwenspersoon helpt de medewerker om te gaan met het ongewenste gedrag. Naast een luisterend oor biedt hij ondersteuning bij het bespreekbaar maken van het probleem binnen de organisatie. Alles wat besproken wordt, valt onder het beroepsgeheim en is vertrouwelijk.

De taken zijn onder te verdelen in vier hoofdthema's:

1. Voorlichten en informeren van medewerkers over de werkwijze van de vertrouwenspersoon;
2. Opvang en begeleiding van medewerkers die last hebben van ongewenste omgangsvormen;

3. Het analyseren van voorvallen, adviseren hierin en verwijzen naar professionele hulpverleners;
4. Advies geven aan het Leiderschapsteam over het voorkomen van ongewenst gedrag.

De bevoegdheden zijn van groot belang voor het onafhankelijk uitvoeren van de functie:

1. De vertrouwenspersoon heeft de bevoegdheid om gesprekken te voeren;
2. Hij kan externe deskundigen raadplegen, zoals een externe, gecertificeerde vertrouwenspersoon;
3. De vertrouwenspersoon mag de werknemer doorverwijzen naar een andere (externe) vertrouwenspersoon;
4. Hij heeft geheimhouding, maar als een zaak voor de rechter komt, moet hij wel openheid van zaken geven;
5. Hij mag het Leiderschapsteam gevraagd en ongevraagd advies geven over eventuele patronen die hij ziet;
6. Hij mag de voorzitter van de Raad van Toezicht inlichten wanneer, ondanks gesprekken met het Leiderschapsteam, het ongewenste gedrag blijft bestaan en het een risico vormt voor de gezondheid van de organisatie.

4.2.2 Kanalen interne melding

Het meldsysteem kent drie kanalen waarlangs schendingen kunnen worden gemeld:

1. **Het leiderschapsteam;** Medewerkers kunnen schendingen melden bij zowel hun direct leidinggevende als bij de directeur. Dit kan zowel mondeling als schriftelijk, met de uitdrukkelijke vermelding dat het een melding van een overtreding integriteit betreft. Wanneer een leidinggevende een melding ontvangt zal hij de integriteitsfunctionaris en de directeur hiervan op de hoogte stellen.
2. **De integriteitsfunctionaris;** Medewerkers kunnen een schending ook direct melden bij de integriteitsfunctionaris.
3. **Klokkenluiders-punt;** Als een medewerker geen vertrouwen heeft in de opvolging binnen de organisatie van IJM Nederland is het mogelijk om gebruik te maken van het klokkenluiders-punt van IJM Global.

4.3 Extern meldsysteem

Derden kunnen als volgt een melding maken bij IJM Nederland:

- Allereerst kunnen klachten via onze algemene contactkanalen worden ingediend. Wanneer het expliciet een integriteitsschending betreft zal deze melding te allen tijde door het leiderschapsteam in behandeling worden genomen.
- IJM Nederland biedt derden ook de mogelijkheid om gebruik te maken van de klachtenbemiddeling door brancheorganisatie Prisma. Meldingen zullen hier uitsluitend in behandeling worden genomen wanneer de klager kan aantonen dat de reguliere klachtenprocedure is doorlopen en onvoldoende uitkomst heeft geboden. Voor dergelijke meldingen geldt een specifieke klachtenprocedure, deze is op onze website beschikbaar.

4.4 Onderzoek en sanctionering

4.4.1 Vooronderzoek

Als een melding binnenkomt bij de integriteitsfunctionaris (langs een van de drie kanalen) doet deze een vooronderzoek. Doel van dat onderzoek is om vast te stellen of er naar deze melding een disciplinair onderzoek gedaan moet worden of dat een andere opvolging noodzakelijk is. De eerste vraag die de integriteitsfunctionaris beantwoordt, is of er bij de kwestie überhaupt sprake is van een schending. Verder gaat zij na of er redenen zijn om te concluderen dat de beschuldiging niet waar kan zijn. Zij maakt ook een inschatting van de bewijsbaarheid. Tenslotte kijkt zij of de schade die het onderzoek zou doen, een eventueel passende straf zou overtreffen.

4.4.2 Onderzoek

Als de integriteitsfunctionaris concludeert dat een onderzoek geboden is, legt zij een voorstel voor onderzoek voor aan de directeur. De directeur bepaalt welk onderzoek er plaats vindt en door wie dit wordt uitgevoerd. Bij complexe of ernstige situaties zullen doorgaans externe onderzoekers worden ingeschakeld. Wanneer een onderzoek wordt opgestart wordt de Raad van Toezicht hiervan op de hoogte gesteld. IJM Global is in de Raad van Toezicht vertegenwoordigd.

4.4.3 Sanctionering

Als het onderzoek aantoont dat een medewerker een schending heeft begaan, wordt er door een extern of intern juridisch medewerker een strafadvies opgesteld. De medewerker houdt daarbij rekening met de jurisprudentie om tot een proportionele en consistente strafmaat te komen. Vervolgens wordt het advies aan de directeur voorgelegd. Mogelijke maatregelen zijn als volgt:

- Aangifte (in het geval van criminele handelingen)
- Formele waarschuwing;
- Schorsing (tijdelijk op non-actiefstelling);
- Ontslag

De directeur neemt het uiteindelijke besluit over het eventueel opleggen van straf. Bij ernstige misstanden zal ook de toezichthouder CBF worden geïnformeerd.

5 HET MOREEL LEERPROCES

Er zijn helaas voldoende voorbeelden bekend van organisaties die een keurig beleidsstuk hadden liggen en toch niet integer handelden. Daarnaast zijn ethische vraagstukken niet altijd zwart-wit, maar dient er soms een belangenafweging gemaakt te worden in het grijze gebied.

IJM Nederland vindt het daarom van belang om scherp te blijven op het thema integriteit en het gesprek en de intervisie hierover aan te moedigen. Wij geven hier op de volgende manieren invulling aan:

- Tenminste jaarlijks vindt er een moment plaats waarin aandacht wordt besteed aan een onderdeel van het integriteitsbeleid.
- Het bestuur reflecteert jaarlijks op de invulling van het integriteitsbeleid en legt dit vast in het jaarverslag.

6 BIJLAGE 1 - GEDRAGSCODE

6.1 Introduction

IJM is a global team that protects the poor from violence throughout the developing world. IJM partners with local authorities to rescue victims of violence, bring criminals to justice, restore survivors, and strengthen justice systems.

6.1.1 Mission Statement

The mission of International Justice Mission is to protect people from violent forces of injustice by securing rescue and restoration for victims and ensuring public justice systems work for the poor.

6.1.2 IJM's Core Commitments and Corporate Values

The employees of IJM have come together around a commitment to doing the work of justice **as a Christian community**. Because of the universal appeal of the work of justice, others doing such work can and have organized themselves differently; but we have chosen to work together as a **community of Christian spiritual formation**.

We are committed to the work of justice not only because the work of justice is a *spiritual fruit* of Christian formation (i.e. justice is what Jesus would do and it manifests obedience to Him); but also because the work of justice is a *spiritual discipline* of service that God uses to shape us to be more like Christ. Our justice work, therefore, is both a *fruit* and a *means* of our shared journey **to be more like Christ** – which is our shared purpose in life.

Accordingly, IJM employees are expected to make and continuously live out three core commitments:

- 1. We affirm the Apostles' Creed.**
- 2. We affirm our intention to obey Christ in everything.**
- 3. We affirm our desire to participate in IJM's community of Christian spiritual formation and its rhythms of spiritual exercises.**

In addition, IJM's corporate values affect everything we do. The manner in which IJM employees conduct themselves is often as important as the work itself. We are **Christian**. We are **professional**. We are **bridge builders**.

We are Christian. We are inspired by Jesus Christ, submitted to the Father, dependent upon the Holy Spirit, directed by the Scriptures, and in community with the Body of Christ at home and abroad. We seek to manifest the fruit of the Spirit in all that we do: love, joy, peace, patience, kindness, gentleness, goodness, faithfulness, and self-control.

We are professional. The nature of our work involves matters of the utmost gravity. By implication, everything that we do in matters of both substance and presentation, we



pursue with the highest level of professionalism to engender, earn, and keep the trust of those whom we serve. Accordingly, we value knowledge and expertise. We demand accuracy and dependability. We invest in excellence. We exert extreme efforts to achieve outcomes. We evaluate by outcomes. And we love to learn.

We are bridge builders. Fundamentally, being bridge builders means that we pursue our work vigorously, boldly, and forcefully – but with humility. We do not derive our core identity from a subculture of exclusion, but from a witness of loving grace. Where it advances our mission of serving the victims of injustice, we actively strive to find common ground of cooperative endeavour with all people of good will from a broad range of cultures, religions, social backgrounds, experiences, and passions. We invest in building relationships with people – especially with people who are unfamiliar with or outside our subculture. We are careful about the language we use and recognize the power of words to both needlessly alienate as well as strategically enfold.

6.2 IJM's Theory of Change

IJM engages at every level of protecting the poor from violence, using casework to drive system reform, leverage global influence, and scale impact through partnership. Through our unique Justice System Transformation model, we help victims of violence secure justice and partner with key authorities to fix broken justice systems in the countries where we work.

We collaborate with local police to rescue victims from ongoing violence and bring them to safety. We join with social workers to restore survivors to safety through counselling, education and skill training. We partner with police to restrain criminals, traffickers, and slave owners from hurting others. We identify gaps in the systems that protect the poor, and then work with police and courts to address these challenges.

6.3 Governance

IJM shall exercise good governance by observing its Articles of Association and applicable law. Management and Supervisory Board Members must exercise their powers and discharge their duties with the degree of care and diligence of a reasonable person. Additionally, they must

- a. not misuse their position as a Management or Supervisory Board member;
- b. not misuse information they gain in their role as a Management or Supervisory Board member;
- c. disclose any perceived or actual material conflicts of interest pursuant to IJM's conflict of interest policy;
- d. ensure that the financial affairs of IJM are managed responsibly; and
- e. ensure the assets of IJM are used solely to further the charitable purpose of IJM.

6.4 How We Work

One of IJM's core values is professionalism. We realize that the work of IJM touches lives. Our every effort should manifest our commitment to excellence. Both our work product

and our comportment should reflect this core value. Every written piece or other work product we release should be thoughtfully prepared and carefully reviewed for both content and presentation.

6.4.1 Ethical Conduct

As a nonprofit organization, we should be transparent in all our activities, except as appropriate in confidential or sensitive internal investigations and with confidential case-related investigations as appropriate. It is the policy of IJM to conduct its activities according to the highest ethics. All employees are expected to act with integrity when dealing with government agencies, missions, nationals, like agencies, sponsors and donors, suppliers, fellow employees, the general public, and those whom we are seeking to serve.

6.4.2 Conflicts of Interest

IJM employees shall conduct IJM affairs decently and above reproach and shall operate with the highest level of integrity to avoid conflicts of interest. The Management Board has adopted a Policy on Conflicts of Interest, a copy of the current version of which is available in the Policy Library on SharePoint. In the most general terms, the Policy reflects the determination by the Board that each individual authorized to make commitments on behalf of IJM should be in a position to make those commitments free from any distracting economic, familial, or other conflicting interest. Employees and Board members should read and be familiar with the Policy and the ways in which it applies to their activities.

6.4.3 Bribery and Extortion

As an international organization, IJM must conduct its mission cross-culturally, influenced by the values and norms of the local society. Some standards, however, are trans-cultural and will not be compromised. It is the policy of IJM that no staff member is allowed to offer or accept bribes. Following the guidance of the United Nations Convention against Corruption, IJM defines a bribe as: *An undue advantage given to a person or entity in order that a person act or refrain from acting in the exercise of his or her duties.*

Examples of bribery include, but are not limited to, the following:

- Payment of an unofficial fee to a judicial clerk to ensure an IJM case is heard on a timely basis or to secure copies of court records.
- Payment of an unofficial fee to a police officer to execute a warrant of arrest or file a report.
- Payment of an unofficial fee to secure the dropping of charges against, or release from detention of, an IJM staff member or client.
- Payment of an unofficial fee to secure an MOU or visa authorizing work in the country.
- Providing an official with cash, property or services that exceed the value of the actual expenses incurred by the government office or official.



IJM will not participate in these corrupt and unjust practices and will not tolerate such actions by its staff.

Commendations, awards, and covering actual operation expenses (e.g., buying fuel for a police vehicle or providing a vehicle for an operation) are not prohibited by this policy.

6.4.4 Accepting personal gifts

Employees are prohibited from soliciting any personal gift, gratuity, favor, service, or other benefit (collectively, a “gift”) from individuals or companies seeking any advantageous action by, or relationship with, IJM. The acceptance of a personal gift, even if unsolicited, is also prohibited in most instances. A personal gift valued in excess of \$50 or of undetermined value, unless employed for purpose or shared widely within the organization, must be declined or returned immediately. Multiple gifts from a single source in any calendar year are prohibited.

Gifts of promotional items without significant value that are routinely distributed by suppliers to clients, and courtesy copies of professional printed matter, may be accepted. However, employees are prohibited from accepting gifts of money or their equivalent, regardless of the amount, at any time.

Employees are prohibited from accepting a supplier’s offer to pay for travel to and/or attendance at a conference, business meeting, or similar function without the prior written approval of the Manager or Executive Director.

6.4.5 Government Regulations

It is the policy IJM to be a good corporate citizen of each community, state and nation in which it operates by respecting and following all government regulations clearly applicable to it and affecting the conduct of the organization. Where a government regulation appears to be unjust or a hindrance to IJM fulfilling its corporate purposes, the organization may use appropriate legal measures to advocate change in the law or regulation or its application to the organization or to the victims we seek to serve.

6.4.6 Information Security

During the course of daily work activities at IJM, staff have access to numerous forms of confidential information. Confidential information may include the following in any format:

- Casework and investigative materials
- Client stories and experiences
- Personal data of staff, donors, clients, and others
- Investigation staff identities
- Proprietary data, metrics and program design

Staff are expected to take precautions with IJM information, both while employed and after his/her tenure with IJM. Employees are expected to gain the appropriate non-



disclosure agreements, waivers, and contracts for any work conducted by third parties on behalf of IJM prior to beginning any project – including non-disclosure agreements for any third parties who will have any access to confidential materials.

No IJM agent (including all employees, interns, fellows, and volunteers) – past and present – is authorized to publish books, memoirs or other formal works relaying information about their time at/working with IJM without the express permission of IJM Global.

6.4.7 Conflict Resolution & Grievances

As human beings, disputes may arise between us - either between IJM employees or between an employee and IJM itself. As Christians we chose to find resolution, as outlined below (*with the exception of harassment and discriminatory behavior, see final section*).

Serve God • Instead of focusing on our own desires or dwelling on what others may do, we will seek to please and honor God by depending on His wisdom, power, and love; and by seeking to maintain a loving, merciful, and forgiving attitude.

Get the log out of your own eye • Instead of attacking others or dwelling on their wrongs, we will take responsibility for our own contribution to conflicts, ask God to help us change any attitudes and habits that lead to conflict, and seek to repair any harm we have caused.

Speak directly to the person involved • Instead of pretending that conflict does not exist or talking about others behind their backs, we will choose to overlook minor offenses or we will talk directly and graciously with those whose offenses seem too serious to overlook. When a conflict with another cannot be resolved in private, we will ask others to help us settle the matter.

Go and be reconciled • Instead of accepting premature compromise or allowing relationships to wither, we will actively pursue genuine peace and reconciliation, forgiving others, and seeking just and mutually beneficial solutions to our differences.

With the exception of harassment and discriminatory behavior, which should be reported as indicated below, IJM expects all employees to follow the principle of first confronting those who have wronged you. However, if this is not possible or appropriate given the particular circumstances, an employee with a grievance should first report the grievance to his/her manager. If, given the nature of the grievance, one's manager would not be appropriate, please contact the Executive Director. If the grievance involves the Executive Director, please contact the Board Chair or Global People Support. The Management Board welcomes any employee to contact them when:

- Internal grievance procedures outlined in this manual have been exhausted;

- The employee alleges either that the IJM policy has been violated to his or her detriment or that the IJM policy does not adequately protect his or her rights.

6.4.8 Non-Harassment and Non-Discrimination

The preceding Conflict Resolution & Grievance Procedure is a general policy covering disagreements in the workplace. This Non-Harassment and Non-Discrimination policy is distinguished from the Conflict Resolution policy in that it prohibits harassment and/or discrimination based upon a protected classification. This policy encourages, but does not require, the reporter to first confront the person alleged to have violated the policy. IJM desires to create and maintain a work environment in which all people—staff, volunteers, contractors, donors, partners, and other visitors and supporters—are treated with dignity, decency, and respect. This is not merely out of an obligation to comply with legal requirements prohibiting harassment, unlawful discrimination, and other forms of inappropriate behavior, although legal compliance is critical. Nor is this motivated solely by pragmatic goals of creating a more attractive and effective work environment, although offensive and disrespectful behavior does indeed interfere with work performance and employee retention.

Rather, this commitment stems primarily from a desire to reflect in IJM's work environment the character of God. Harassment, unlawful discrimination, and other forms of inappropriate behavior are inconsistent with, and undermine, IJM's identity as a community of spiritual formation, and our core values. While IJM takes seriously its legal obligations to prevent such inappropriate behavior, it strives to go beyond mere compliance to create an affirmatively welcoming, loving, and respectful workplace.

It is against IJM policy for any employee, client, government official, donor or vendor to harass or discriminate against any IJM employee or non-IJM employee unlawfully. IJM will not tolerate unlawful harassment or discrimination because it is personally offensive, fails to respect the rights of others and interferes with work performance. All employees, contractors, managers and non-managers must comply with this policy and take appropriate measures to ensure that such conduct does not occur.

A specific prohibited type of harassment is sexual harassment. Sexual harassment includes, but is not limited to, unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature when:

- Submission to such conduct is made either explicitly or implicitly in a term or condition of an individual's employment; or
- Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or
- Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment.

Harassment may take many forms, including, but not limited to:

- **Verbal:** innuendoes; suggestive comments; jokes of a sexual, ethnic, or racist nature; sexual propositions, advances or threats; subtle or overt pressure for sexual favors; inappropriate comments about an individual's body, clothing or personal inquiries into their private lives
- **Non-verbal:** objects or pictures, email, sounds, gestures, and downloading or accessing certain websites
- **Physical:** unwanted contact, including touching, pinching, brushing the body or pushing

Any supervisor/manager who has reason to suspect harassment may be occurring, or who receives a complaint of harassment or inappropriate behavior in violation of this policy on the part of or from any employee, vendor, client, government official, donor or contractor concerning an IJM employee, must notify the Office of General Counsel (legal@ijm.org) (IJM Global) immediately.

In addition, IJM encourages any employee who believes they are experiencing harassment or discrimination in the workplace to advise the offender promptly that their behavior is unwelcome and request that it be discontinued. However, IJM recognizes that an employee may not be comfortable talking directly to his/her offender. In all instances, the individual should report such offending behavior immediately to their supervisor/manager, Global People Support (globalpeoplesupport@ijm.org) (IJM Global) or the Office of General Counsel (legal@ijm.org) (IJM Global). Further, any employee who believes they witnessed harassment should immediately report the matter to any of the previously listed resources. All complaints of harassment or discrimination will be promptly and appropriately investigated. Employees must cooperate in all investigations. If the complaint is found to be valid, the activity found to be harassment or discrimination or any conduct which violates this policy, IJM will take proper remedial action. Retaliatory measures will not be taken, or tolerated, against an employee who complains of harassment/discrimination in good faith or who participate in the investigation of such complaints in good faith. There should not be any circumstances in which the employee should report the harassment to a supervisor/manager who they are accusing of harassment.

IJM will, to the maximum extent feasible, maintain the confidentiality of such complaints on a need-to-know basis. However, investigation of such complaints will require disclosure to the accused party and other witnesses in order to gather pertinent facts.

Misconduct constituting harassment or inappropriate behavior contrary to this policy will be dealt with appropriately and promptly. Violations of this policy may result in corrective action up to, and including, termination of employment. Corrective action is determined on a case-by-case basis and may include training, counseling, warnings and/or termination. In addition, under applicable law, violations of this policy may lead to personal liability and financial responsibility to the accused harasser.

6.4.9 Workplace Violence Prevention

IJM is committed to preventing workplace violence and to maintaining a safe work environment. IJM has adopted the following guidelines to deal with intimidation or other threats of or actual violence that may occur onsite or offsite during work-related activities. All employees, customers, vendors and business associates should be treated with courtesy and respect at all times. Employees are expected to refrain from fighting or other reckless conduct that may be dangerous to others. Conduct that threatens, intimidates or coerces another employee, customer, vendor, or associate will not be tolerated. IJM resources may not be used to threaten, stalk or harass anyone at or outside the workplace. IJM treats threats coming from an abusive personal relationship as it does other forms of violence.

Indirect or direct threats of violence, incidents of actual violence, and suspicious individuals or activities should be reported as soon as possible to a supervisor, Global Safety & Security, Global People Support, or any member of senior management. When reporting a threat or incident of violence, the employee should be as specific and detailed as possible. Employees should not place themselves in peril, nor should they attempt to intercede during an incident.

Employees should promptly inform Global People Support of any protective or restraining order that they have obtained that lists the workplace as a protected area. Employees are encouraged to report safety concerns with regard to intimate partner violence. IJM will not retaliate against employees making good-faith reports. IJM is committed to supporting victims of intimate partner violence by providing referrals to the organization's employee assistance program and community resources and providing time off for reasons related to intimate partner violence.

IJM will promptly and thoroughly investigate all reports of threats of violence or incidents of actual violence and of suspicious individuals or activities. IJM will not retaliate against employees making good-faith reports of violence, threats or suspicious individuals or activities. To maintain workplace safety and the integrity of its investigation, IJM may suspend employees suspected of workplace violence or threats of violence, either with or without pay, pending investigation. Anyone found to be responsible for threats of or actual violence or other conduct that is in violation of these guidelines will be subject to prompt corrective action up to and including termination of employment.

In order to promote a safe working environment for all, possession of firearms or other weapons are prohibited in IJM premises and vehicles (rented or owned).

6.4.10 Whistleblower Protection

The preceding Conflict Resolution & Grievance Procedure is a general policy covering disagreements in the workplace. This Whistleblower Protection policy is distinguished from the Conflict Resolution policy in that employees who are aware of illegal or unethical behavior within the organization need not first confront the person alleged to



have committed the infraction, but should immediately report it to the appropriate IJM representative (see below).

A “whistleblower” is defined as an IJM employee who reports to an appropriate authority any activity that he or she considers to be illegal or unethical. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures, as appropriate management officials are charged with these responsibilities.

Examples of illegal or unethical activities include but are not limited to theft; other violations of federal, state or local laws; fraudulent financial reporting; or intentional misrepresentation of facts to donors or other constituents. Whistleblower protection shall also be extended to those who report physical, sexual, or emotional abuse of any kind inflicted by IJM employees on IJM clients or their families.

If an employee suspects or is aware of illegal, dishonest or fraudulent activity, the employee must contact his/her immediate supervisor and the Office of General Counsel (OGC) (IJM Global). The OGC is responsible for investigating the allegations and working with Global People Support (IJM Global) to coordinate any appropriate corrective action, and reporting the incident to the proper authorities.

Although the whistleblower need not fully investigate the matter before reporting it, he or she must exercise reasonable judgment to avoid baseless allegations. A whistleblower who *intentionally* files a false report of wrongdoing will be subject to corrective action up to, and including, termination.

IJM will, to the maximum extent feasible, maintain the confidentiality of such complaints on a need-to-know basis. However, investigation of such complaints will require disclosure to the accused party and other witnesses in order to gather pertinent facts.

All “whistleblower” complaints covered by this policy will be promptly investigated. Employees must cooperate in all investigations. If the complaint is found to be valid, IJM will take proper remedial action. Retaliatory measures will not be taken or tolerated against a whistleblower who highlights illegal or unethical activity in good faith or who participate in the investigation of such complaints in good faith.

6.4.11 Drugs and Alcohol: Drug-Free Workplace

IJM has a commitment to protect the health and safety of its employees. As part of this commitment, the Organization seeks to maintain a workforce and environment free from the harmful effects of alcohol and drug abuse. The Organization strives to prevent drug and alcohol abuse including providing assistance toward the rehabilitation of any employees who seeks the Organization’s help in overcoming an addiction to, dependence upon, or problem with alcohol and/or drugs.

The Organization has established the following rules regarding illegal drugs, controlled substances and alcohol abuse. The obligations set forth in these rules constitute a condition of employment.

The unlawful or unauthorized manufacture, distribution, dispensation, possession or use of a controlled substance (drugs) or drug paraphernalia is prohibited in the IJM workplace while on Organization business (whether or not on Organization premises) or while representing IJM and will constitute grounds for immediate termination of employment. Under no circumstances shall an IJM employee operate a motor vehicle while under the influence of alcoholic beverages or controlled substances (drugs).

Involvement with or knowledge of the sale of illegal drugs or controlled substances on Organization premises constitutes grounds for termination of employment. Employees are also prohibited from reporting to work or working while they are using or under the influence of any illegal drug or any controlled substances that may impact an employee's ability to perform their job or otherwise pose safety concerns. Nonetheless, in the case of controlled substances, such usage is permitted if pursuant to a licensed medical practitioner's instructions authorizing the employee or individual to report to work while using the controlled substance. However, this does not extend any right to report to work under the influence of medical marijuana, to the extent permitted by and in accordance with applicable law.

The Organization maintains a policy of non-discrimination and will endeavor to make reasonable accommodations to assist individuals recovering from substance and alcohol dependencies, and those who have a medical history which reflects treatment for substance abuse conditions. However, employees may not request an accommodation to avoid discipline for a policy violation.

The Organization reserves the right to conduct random searches or drug or alcohol tests to ensure compliance with this policy. Violation of this policy will result in corrective action, up to and including termination.

6.4.12 Attire

Our attire is one of the easiest ways for us to express our corporate identity and values. We expect all staff members to use their best judgment and dress in the manner that would best represent IJM and build credibility in the specific context in which they find themselves.

Our office observes smart business casual attire. Since tastes and preferences vary, IJM staff members are expected to demonstrate good judgment and professional taste in choosing what to wear at work. It is IJM's intention to maintain an image that enhances IJM's reputation as a professional organization.

Supervisors/managers will be responsible for answering questions and resolving concerns related to this policy on a case-by-case basis to ensure unique circumstances are appropriately considered.

6.4.13 Mobile Devices and Driving

Of concern to IJM are the dangers of distracted driving, therefore we prohibit texting or talking on a handheld device while operating a vehicle for work purposes, unless using a hands-free setup. This includes, but is not limited to, answering or making phone calls, engaging in phone conversations, reading or responding to e-mails and text messages. Employees are encouraged to pull over to a safe place if a call must be made or received while on the road.

6.5 Partnerships

To accomplish its vision, IJM will enter into formal affiliations with a wide variety of NGO, IGO, private, and government entities (e.g., strategic alliances, partnerships, affiliations, MOUs, memberships, endorsements, etc.). The CEO / Executive Director shall maintain management policies that provide for appropriate evaluation, approval and management of potential formal affiliations.

The policy shall allow management to establish formal affiliations only with organizations whose mission and values are not conflicting with IJM's mission and values. Whenever possible, IJM shall provide and rely on its own articulation of its mission and values, rather than assenting to or affirming another organization's mission, values, beliefs or principles.

The policy shall also define the various categories of formal affiliations, and the appropriate level of management evaluation and approval for each category. The highest category of formal affiliations, i.e., long-term relationships that require significant investment of IJM resources (financial, staff time, technical capacity, or brand equity) and involve significant co-branding or co-marketing, shall be defined in the policy as "Strategic Alliances," and shall be evaluated and approved at the highest management level.

6.6 Financial Standards and Transparency

As stated in IJM's conflict of interest policy, as a not-for-profit organization, we should be transparent in all our activities. It is the policy of IJM to conduct its ministry according to the highest ethics, based upon Biblical standards. All employees are expected to act with integrity when dealing with government agencies, mission and relief and development organizations, other agencies, sponsors and donors, suppliers, fellow employees, nationals, and the general public.



International Justice Mission will conduct its affairs decently and above reproach, and will operate with the highest level of integrity and avoid conflicts of interest.

Between the organization and its Board, officers and management employees, there exists a fiduciary duty that carries with it a broad and unbending duty of loyalty. The Board, officers and management employees have the responsibility to administer the affairs of the organization honestly and prudently, and to exercise their best care, skill and judgment for the sole benefit of IJM and those it seeks to serve. These persons shall exercise the utmost good faith in all transactions involved in their duties, and they shall not use their positions with the organization or knowledge gained there from for their personal benefit. The interests of the organization must have the first priority, and all purchases of goods and services must be effected on a basis that secures for the organization full competitive advantage as to product service and price.