

ABH PARTNERS PLC

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Knowledge. Synergy. Impact.

POLICY NAME	Code of Ethics and Professional Conduct			POLICY NO.	4
EFFECTIVE DATE	Nov. 11, 2025	DATE OF LAST REVISION	Nov. 11, 2025	VERSION NO.	3
ADMINISTRATOR RESPONSIBLE	Ethics and Compliance Officer	CONTACT INFORMATION	T. +251 116 186 520		

VERSION HISTORY				
VERSION	APPROVED BY	REVISION DATE	DESCRIPTION OF CHANGE	AUTHOR
1	Approved by CEO	6/20/2020	First version	HR
2	Approved by CEO	2/26/2022	Second Version, more elaborate and specific with definitions	Business Development Officer
3	Approved by CEO	11/11/2025	Added the UN requirements	Business Development Officer

1 Purpose and Scope

ABH Partners is committed to the highest standards of integrity, transparency, accountability, and ethical conduct in all its operations. This Code of Ethics establishes the fundamental principles and rules that govern the behavior of all individuals working for or on behalf of ABH Partners, including General Assembly, staff, consultants, contractors, and partners. Adherence to this Code is mandatory and a core requirement for working with any multilateral and bilateral donor and for maintaining trust with stakeholders, partners, and the public.

This Code is designed to:

- Define expected standards of ethical and professional behavior.
- Protect the organization's reputation, assets, and mission.
- Prevent fraud, corruption, and misconduct.
- Ensure compliance with all applicable laws and regulations
- Ensure overall compliance with applicable multilateral and bilateral program funders.

2 Core Values and Ethical Principles

All representatives of ABH Partners shall be guided by the following principles:

- **Integrity:** Act honestly, fairly, and reliably in all professional dealings.
- **Accountability:** Take responsibility for decisions and actions, and be answerable for their consequences.
- **Transparency:** Conduct operations in an open manner, with appropriate disclosure of information.
- **Impartiality:** Exercise objective and independent judgment, free from conflicts of interest.
- **Respect:** Treat all people with dignity, fairness, and courtesy, upholding human rights.
- **Stewardship:** Manage resources (financial, human, environmental) responsibly and efficiently to achieve our mission.

3 Standards of Conduct

3.1 References

This standard makes reference to ABH policies including: Anti-Fraud and Anti-Corruption Policy; Anti-Money Laundering/ Counter Financing of Terrorism (AML/CFT) Policy; Conflict of Interest (CoI) Policy; as well as Prohibited Practice Policy.

3.2 *Prohibition of Fraud and Corruption*

- ABH Partners has a **zero-tolerance policy** towards fraud, bribery, corruption, collusion, coercion, or any form of unethical advantage.
- Staff shall not offer, give, solicit, or accept any bribe or undue advantage in connection with their duties.
- All financial transactions and records must be accurate, complete, and transparent.

3.3 *Fair Dealing and Procurement*

- All procurement processes for goods, services, and works must be fair, transparent, competitive, and based on objective criteria.
- Favoritism, nepotism, or preferential treatment is prohibited.
- Confidential bidding information shall not be disclosed.

3.4 *Protection of Assets and Resources*

- All individuals are responsible for safeguarding ABH Partners' tangible and intangible assets (including funds, equipment, data, and intellectual property) from loss, theft, misuse, or waste.
- Resources shall be used solely for legitimate organizational purposes.

3.5 *Confidentiality and Data Protection*

- Confidential information pertaining to the organization, its partners, beneficiaries, or staff shall not be disclosed without proper authorization.
- Personal data shall be collected, stored, and processed in accordance with applicable data protection laws and principles.

3.6 *Workplace Environment*

- ABH Partners is committed to a work environment free from harassment, discrimination, abuse, or exploitation of any kind.
- We promote diversity, equity, and inclusion, and provide equal opportunity based on merit.

3.7 *Reporting Misconduct (Whistleblowing)*

- All individuals have a responsibility to report in good faith any suspected violation of this Code, laws, or funder policies for programs if applicable.

- Reports can be made through line managers, the **Ethics and Compliance/Protection Officer**, or via channels outlined in the **Whistle-blower Policy**.
- Retaliation against good-faith whistleblowers is strictly prohibited and will result in disciplinary action.

3.8 *Relations with Stakeholders and Communities*

- Engagement with governments, communities, civil society, and the private sector shall be conducted respectfully, transparently, and in accordance with our Environmental and Social Policy.

4 *Compliance with Laws and Funders' Policies*

All individuals must comply with the national laws of the countries where ABH Partners operates, as well as all applicable policies and guidelines of our Funders when applicable. Where this Code sets a higher standard, the higher standard shall apply.

5 *Implementation and Responsibilities*

- Senior Management is responsible for championing this Code, ensuring its integration into all systems, and leading by example.
- Ethics and Compliance Officer/Protection Officer is responsible for overseeing implementation, providing guidance, managing declarations, and investigating reports of misconduct.
- All staff is bound by this Code and are responsible for reading, understanding, and complying with its provisions. They must complete mandatory ethics training and sign an acknowledgment form.

6 *Declaration and Transparency*

Key senior personnel and project decision-makers shall submit annual Conflict of Interest Declarations. A summary of the Code and its implementation will be publicly disclosed on ABH Partners' website.

7 *Breaches and Disciplinary Actions*

Violations of this Code will be investigated promptly and fairly. Depending on the severity, consequences may include:

- Mandatory training or counseling.
- Formal warning or reprimand.
- Suspension or termination of contract/employment.
- Legal action and reporting to relevant authorities, including the GCF.

- Financial restitution where applicable.

8 Review

This Code of Ethics will be reviewed periodically (at least every three years) and updated as necessary to reflect changes in law, requirements, and organizational experience.



Acknowledgement of Receipt and Understanding of Code of Ethics

This is to confirm that I have received a copy of the Code of Ethics and Professional Conduct of ABH Partners.

I acknowledge that I have read, understood, and agree to comply with the principles, policies, standards, and guidelines outlined above. I understand that the Code of Ethics represents the organization's expectations regarding professional conduct, integrity, accountability, confidentiality, compliance with applicable laws and regulations, and ethical behavior in all business dealings.

I further acknowledge that:

- I am responsible for adhering to the Code of Ethics at all times while representing or performing duties on behalf of the Company.
- I will seek clarification from Management or the Human Resources Department if I have any questions regarding the interpretation or application of this Policy.
- I am obligated to report any known or suspected violations of this Policy in accordance with the Company's reporting procedures.
- Failure to comply with the Code of Ethics may result in disciplinary action, up to and including termination of employment or contract.
- This acknowledgement does not constitute a contract of employment nor does it alter the terms of my employment agreement.
- I understand that ABH may amend, modify, or rescind any policy or practice, described in this Policy, with or without notice, and it is my responsibility to stay informed of such changes.

By signing below, I confirm my commitment to uphold the ethical standards and values of the Company.

Employee Name: _____

Employee Signature: _____

Position/Title: _____

Department: _____

Date: _____