



AFR

Third Party Code of Conduct Policy



ACCESS TO FINANCE RWANDA

AFR Third Party Code of Conduct

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Introduction

AFR's Third Party Code of Conduct (the Code) highlights the minimum standards of integrity and business conduct AFR expects of its third parties with which it engages. The Code is not a substitute for third parties' accountability and responsibility to exercise good governance.

Scope

All third parties should adhere to the overarching principles of the Third-Party Code of Conduct. Each third party must confirm in writing that they have reviewed the Code and understands and agrees to it before being onboarded.

By AFR third parties, we mean suppliers, contractors, sub-contractors, consultants, implementing partners, sub implementing partners, interns, etc.

Policy elements

All third parties are bound by their contract to follow the Third-Party Code of Conduct while engaging with AFR.

The components of the Code of Conduct are:

1. Compliance with laws and regulations.

AFR is committed to monitoring compliance against its internal policies and procedures, local laws and regulations.

As an AFR third party:

1. I will have adequate mechanisms in place to ensure compliance with the Code, applicable AFR policy and procedures and local laws and regulations.
2. I will provide complete and accurate information to facilitate due diligence efforts undertaken by AFR, where requested.
3. I will promptly implement, as advised, remediation plans prescribed by AFR in instances where I am found to violate AFR's internal policy and procedures, laws and regulations and/or the Code.

2. Whistle blowing and non-retaliation.

AFR is committed to addressing potential violations and protecting its partners and employees against retaliation for reporting concerns. Procedures have been set out on how suspicions or allegations of aid diversion, fraud, money laundering or counter-terrorism finance can be reported.

As an AFR third party:

I will report in good faith any concerns in connection with AFR's operations and potential violations of this Code, laws, regulations, or ethical standards to the following whistleblowing hotlines that provide for anonymous reporting and are available 24/7. For details of the hotlines, refer to the AFR Whistleblowing Policy or AFR website www.afr.rw

3. Conflict of interest

AFR is committed to identifying and addressing real and potential conflicts of interests that may arise in the course of carrying out its activities.

As an AFR third party:

1. I will notify AFR of actual or potential conflict of interest that may impact my engagement with AFR on a timely basis.
2. I will not be associated or involved in any way, directly or indirectly, with the preparation of the design, specifications and/or other documents used as part of any selection for which I am submitting a bid or proposal.
3. I will put in place relevant measures to mitigate conflict of interest risks.

4. Corruption and bribery

AFR does not tolerate corruption or bribery in any form. Soliciting, accepting, offering, promising or making other improper payments, including facilitation payments, is strictly prohibited.

As an AFR third party:

1. I will comply with all applicable laws and regulations relating to corruption in any form, including bribery, fraud, and facilitation payments.
2. I will not accept, offer, promise, or give undue advantage, favour or incentive that has no legitimate business purpose of influencing decision making.
3. I will report if approached or solicited as per the whistleblowing mechanisms put in place by AFR.

5. Gifts, benefits and hospitality

While accepting gifts and hospitality in certain circumstances may further AFR's interests this must be balanced with upholding high standards of propriety and guarding against any reasonable suspicion of perceived or actual conflicts of interest or an undue obligation being created.

As an AFR third party:

1. I will comply with AFR conflict of interest policy.
2. I will not provide or accept gifts or hospitality with the intention of influencing the recipient.
3. I will provide or accept gifts or hospitality within the reasonable limits (maximum: USD 50).

6. Economic crime and money laundering

AFR does not tolerate economic crime, including money laundering and terrorist financing activities.

As an AFR third party:

1. I will not provide any service or enter into any arrangement that may constitute AFR being involved directly or indirectly in economic crime, including money laundering activities.
2. I will not channel any funds to, or support illegal activities such as terrorism, tax evasion, fraud, etc.

7. Fair competition

AFR is committed to fair competition and does not tolerate anti-competitive behaviour.

As an AFR third party:

1. I will not engage in unfair competition in any form under applicable antitrust and competition laws and regulations, either alone or in collusion with other entities or individuals.
2. I will not enter into any agreement, formally or informally, to unlawfully restrict competition and/or influence pricing within the market.

8. Value for money and governance

AFR seeks to maximise development results while driving cost efficiency throughout the programme' lifecycle.

As an AFR third party:

1. I will pursue continuous improvement and enhance my governance structures to reduce waste and improve efficiency.
2. I will be open and honest about my capacity and capability, accepting accountability and responsibility for my performance.

9. Safeguarding and human rights

AFR is committed to providing equal opportunities to all and a safe and non-discriminatory working environment.

As an AFR third party:

1. I will not discriminate against any individual in my employment or hiring practice. This includes discrimination based on race, ethnicity, colour, age, gender, sexual orientation, political inclination, religion, etc.
2. I will provide a working environment free of abusive, violent, threatening, disruptive behaviour, sexual harassment, and bullying.
3. I will not engage in forced or compulsory labour in any form.

4. I will not employ children in any manner that is economically exploitative or is likely to interfere with the child's health. Strict adherence to the minimum legal age limit will be observed during hiring.
5. I will not commit any act of sexual exploitation, sexual abuse or sexual violence.
6. I will not engage in any sexual activity with any of the beneficiaries (adult or child), or with any persons under the age of 18 years, regardless of the age of majority or consent locally.
7. I will not exchange money, employment, goods, or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour. This prohibition extends to any use of sex trade workers.
8. I will not produce, procure, distribute, or use pornographic material within AFR's offices or using the organisation's equipment. This includes accessing pornographic websites or sending pornographic emails.

10. Health and Safety

AFR is committed to providing a healthy and safe working environment in line with applicable Occupational Safety and Health Administration (OSHA) standards.

As an AFR third party:

1. I will provide adequate occupational safety training for employees.
2. I will identify, assess, and control potential exposure to safety hazards.

11. Environment

AFR is committed to preventing harm to the environment and minimises environmental damage.

As an AFR third party:

1. I will comply with relevant national environmental legislation and discharge permits.
2. I will work to achieve energy efficiency and minimize harmful discharge, emissions, and waste production.

12. Confidentiality and data protection

AFR respects the privacy and confidentiality of information relating or belonging to its clients, partners, staff and others. AFR protects personal and other confidential information in all forms.

As an AFR third party:

1. I will handle and disclose personal data and confidential information obtained during my engagement with AFR, only as authorized by AFR and as required by applicable laws and regulations.
2. I will protect personal data and confidential information against unauthorised and unlawful use, access, loss, damage, or destruction.
3. I will not use, in a manner not authorised, intellectual property obtained in the course of my relationship with AFR.
4. I will use security controls that meet AFR's minimum requirements to maintain and protect information, physical and electronic assets.

Referenced Documents

1. Procurement policy
2. Whistleblowing policy
3. Anti-bullying and harassment policy
4. Counter terrorism financing and anti-money laundering policy
5. Anti-fraud and Anti-corruption Policy
6. Conflict of interest policy
7. Safeguarding and Prevention of Sexual Harassment, Exploitation and Abuse Policy
8. Health and safety policy
9. Data protection policy
10. Information Technology Policy

Acknowledgement

I, _____, confirm that I have read and understood this Third-Party Code of Conduct, and I agree by its terms, which form part of the conditions of my contractual agreement with Access to Finance Rwanda (AFR).

Signature _____

Date _____

Access to Finance Rwanda

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