

Integrity Guideline

GRC - NATIONAL HEADQUARTERS



Foreword

Dear employees,

Protecting the reputation of the German Red Cross, protecting confidential information, and treating each other with respect have always been very important to us. For this reason, we have put together a set of Integrity Guidelines to provide orientation for the daily work of all full-time employees of the GRC - National Headquarters. This is about more than just implementing legal and internal requirements, e. g. to avoid any kind of corruption and liability risks. It is meant to foster a strong culture of trust. Compliance violations can almost always be avoided if advice is obtained at an early stage.

In this regard, our managers have a special responsibility to lead with integrity and a duty of care for the employees. So please do not hesitate to take matters up with your supervisor or our compliance officers when you encounter conflicts of interest or dubious situations. Treating each other fairly and establishing an atmosphere of trust are two things that are especially important to me.

Yours faithfully,



Christian Reuter
Secretary General of the GRC National Headquarters



Preamble

The German Red Cross is a member of the International Red Cross and Red Crescent Movement, which provides comprehensive aid based solely on the severity of need to the victims of armed conflicts and disasters, as well as other persons in need who are experiencing health-related or social emergencies. Additionally, as a “voluntary aid society, auxiliary to the German authorities in the humanitarian field”, the GRC - National Headquarters (hereinafter referred to as “GRC”) has taken up a unique position, with its foundations in the Geneva Convention and the GRC Act, which differs from that of other national aid organizations. As a national society of the Red Cross and the recognized head organization of the independent welfare organizations, the GRC commits to the seven principles of the International Red Cross and Red Crescent Movement: Humanity, impartiality, neutrality, independence, the voluntary basis, unity, and universality. The commitment to these principles is also established in the GRC Act.

Our mission is to provide effective aid and thus consistently implement the principles of the Red Cross and Red Crescent Movement. The principles constitute a particular duty for all of us and are also instrumental in shaping our organizational culture in the GRC. At the same time, they also form the foundation for the very high identification of the voluntary and full-time employees of the German Red Cross.

Here at the GRC, we consider compliance to be adherence to legal and inter-

nal requirements. This also involves the protection of every individual employee and the protection of the GRC in matters concerning its reputation and liability risk. Based on the principles of the Red Cross and Red Crescent Movement as well as the resolutions and position papers of the movement, the Integrity Guidelines of the GRC address particularly important legal provisions and internal requirements that govern how we interact with public officers, business and cooperation partners, and donors as well as voluntary and full-time employees and even the company itself. The Integrity Guidelines should give all employees orientation for making decisions within the context of their work for the GRC.

The Integrity Guidelines of the GRC apply without exception for all full-time employees. Of course they cannot address all relevant situations that we may be confronted with in the practical situations of our everyday work. It is expected that all employees of the GRC will follow all legal and internal requirements relevant to their work and make their decisions in light of the principles outlined in these Integrity Guidelines. They should be supported in this process by their supervisors and with the help of a corresponding compliance training. In case of doubt, employees should approach their supervisor or the compliance office and include them in the decision-making process as early as possible.

Our Guidelines

1

Our compliance management aims to develop a strong culture of compliance.

2

Respectful interaction and appreciative communication are a matter of course for us.

3

The responsible handling of donations as well as other contributions and assets of the GRC is a matter of course for us.

4

Our internal control system aims to develop a positive error culture.

5

We can prevent the development of conflicts of interest through foresighted action.

6

We act with integrity and expect this from our business and cooperation partners as well.

7

We adhere to legal stipulations and internal requirements.

8

The protection of confidential information, data, and IT security are important for us.

9

We handle justified indications of compliance violations appropriately.

1

Our compliance management aims to develop a strong culture of compliance

The establishment of the compliance management system and the work of the compliance officer aim to promote the development of a strong compliance culture in the GRC Internal communication based on a shared understanding of the great importance of adherence to compliance requirements and a trust in the efficiency of preventative measures is indicative of a strong compliance culture.

Compliance violations can almost always be avoided if advice is obtained at an early stage. The corresponding managers and compliance officers are always available for advice when questions arise concerning existing compliance requirements, prevention measures, and the behaviour expected of GRC employees (especially in critical situations).

2

Respectful interaction and appreciative communication are a matter of course for us

As employees of the GRC, we always conduct ourselves fairly and respectfully when interacting with colleagues. We will not tolerate any discrimination based on ethnic background, gender, religion, ideology, disability, age, sexual identity, or other legally protected characteristics. Similarly, we will not tolerate any behaviour or actions within the company that could lead to the abuse of power.

in deciding the extent to which the leadership principles defined for the GRC are implemented and brought to life. The way in which the managers look after their employees as well as the collegiate and trusting interaction of managers among each other are especially significant. Managers have a special responsibility in ensuring that conflicts arising in the GRC are handled in a de-escalating and solution-oriented way.

Mutual respect is an important requirement for developing a positive work environment and a strong culture of trust. We should all be striving to proactively disclose relevant information and communicate in a respectful way. All managers take on a particular stance as role models in this context. With their behaviour, they are a significant factor

In the GRC, clearly defined responsibilities facilitate open communication. All employees of the GRC are always aware of their particular responsibility to protect the reputation of the German Red Cross.

3

The responsible handling of donations as well as other contributions and assets of the GRC is a matter of course for us

We handle the donations and other contributions and assets entrusted to the GRC responsibly. The requirements of the donors and contributors are strictly adhered to by us. With the aim of working in a more

result-oriented way, we proactively work towards improving the content and structure of aid programs.

4

Our internal control system aims to develop a positive error culture

We strive to develop a positive error culture at the GRC. Our understanding of a positive error culture includes internal communication within the GRC on the basis of the shared view that acknowledged errors should be seen primarily as opportunities to learn. This means that we should directly address acknowledged errors in a collegial way and be prepared to be approached for our own possible errors.

The internal review is charged with inspecting the essential processes and the effectiveness of the internal control system within the context of a risk-oriented inspection approach in order to identify recommendations for improving our internal processes. By the nature of the work, an internal review can make an important contribution to the development of a positive error culture in the GRC.

Essential to the protection of allocated funds and assets of the GRC is adherence to the control principles implemented in our internal processes (particularly the second opinion principle, separation of irreconcilable functions/roles/tasks, documentation).

It is expected that all employees of the GRC will become acquainted with the functionality of the internal control system and the requirements for our internal processes which derived from it. The respective manager is available to you as a contact person for any questions you may have.

5

We can prevent the development of conflicts of interest through foresighted action

It is expected that employees of the GRC will keep business and private interests strictly separate. All employees should act in the best interest of the GRC and refrain from any behaviours that could damage the reputation of the GRC. Foresighted action should be used to avoid situations in which employees' personal interests contradict the interests of the GRC or could give the impression of such to third parties.

If, however, a situation should arise in which third parties might get the impression that decisions are not being made primarily in the interest of the GRC, but rather for personal interests, a manager or compliance officer must be informed immediately so that a solution can be found to avoid or minimize the conflict of interest.

6

We act with integrity and expect this from our business and cooperation partners as well

All employees and persons completing transactions in the name of the GRC are prohibited to be involved in any kind of bribery. Employees of the GRC should never demand or accept advantages (e.g. gifts or other personal contributions) that could even just give the impression of an (attempted) influence on our decisions. Similarly, public officers or employees from other organizations should never be promised or given any personal advantages in order to garner any advantages for the GRC. The established procedures should be carefully followed when handling invitations, gifts, and other contributions. When deployed internationally, all employees of the GRC

must also strictly adhere to the valid version of the international code of conduct.

We also expect our business and cooperation partners to act with integrity. In order to ensure this as best as possible, the corresponding manager or compliance officer must be informed immediately when a business partner offers or demands a personal advantage. This also applies when someone has received credible tips concerning (possible) practices of our business and cooperation partners that violate the code of conduct of the GRC.

7

We adhere to legal stipulations and internal requirements

Legally compliant conduct, adherence to internal requirements, and our personal integrity determine our actions at the GRC. In our work for the GRC, we observe all applicable laws and the relevant internal requirements. Our managers are particularly responsible for conveying and implementing our code of conduct. Managers are expected to be aware that they act as role mod-

els. Foresighted behaviour should make it possible to avoid even just the appearance of a possible violation of legal requirements. It is expected that all employees will consult with their supervisors or with the compliance officer in case of doubt and establish the transparency necessary in order to ensure and prove the integrity of conduct of the GRC.

8

The protection of confidential information, data, and IT security are important for us

Confidential information is protected in the GRC. When forwarding information to third parties, employees must carefully adhere to the applicable internal and external requirements.

Personal data can only be collected, processed, and used within the context of the applicable legal regulations and internal requirements. All personal data accessed legitimately within the context of daily operations of the GRC must be treated as confidential and can only be forwarded externally or internally within the restrictions set for the respective purpose. Before any personal information is forwarded to third parties that are not entrusted with completing a task, their authorization to access the data must be reviewed. Performance of the review must be documented together with the result. This obligation

remains binding for all employees, even after their work at the GRC is terminated. When the need for further advising arises, our data protection officer is available to all employees as a contact person.

Access to the internet and to the electronic exchange of information for business purposes is a decisive requirement for the effectiveness of our activity. The advantages of electronic communication also come with risks for identity protection and the security of data. Our internal requirements for IT security serve as an effective precaution against these risks.

It is expected that the employees of the GRC e.V. maintain an awareness of the data protection and IT security requirements relevant to them and adhere carefully to these stipulations.

9

We handle justified indications of compliance violations appropriately

If employees become aware of credible indications of possible serious compliance violations by employees of the GRC, or by a business or cooperation partner, the corresponding manager should be informed immediately. At the latest, when it becomes clear after an initial assessment performed by the manager that a compliance violation has taken place, the manager should involve the compliance officer. Additionally, employees also have access to our compliance officer in addition to or as an alternative and to our external ombudsperson at all times. All comments as well as the identity of informers are treated

as strictly confidential. No actions will be tolerated that are directed against employees who have submitted comments on possible compliance violations in good faith.

Indications on compliance violations are reviewed as legally permissible. In the case of a violation against legal requirements or a serious violation of internal guidelines, employees should expect corresponding consequences that could include disciplinary measures and legal action.



Changes to the Integrity Guidelines

The chair of the board of directors of the GRC is responsible for approving and publishing the Integrity Guidelines. The Integrity Guidelines are regularly reviewed by compliance officers as well as the legal department in order to determine if editing is

necessary. The chair of the board of directors of the GRC is responsible for approving any change to the Integrity Guidelines.

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Fundamental Principles



Humanity

The International Red Cross and Red Crescent Movement, born of a desire to bring assistance without discrimination to the wounded on the battlefield, endeavours, in its international and national capacity, to prevent and alleviate human suffering wherever it may be found. Its purpose is to protect life and health and to ensure respect for the human being. It promotes mutual understanding, friendship, cooperation and lasting peace amongst all peoples.



Independence

The Movement is independent. The National Societies, while auxiliaries in the humanitarian services of their governments and subject to the laws of their respective countries, must always maintain their autonomy so that they may be able at all times to act in accordance with the principles of the Movement.



Impartiality

It makes no discrimination as to nationality, race, religious beliefs, class or political opinions. It endeavours to relieve the suffering of individuals, being guided solely by their needs, and to give priority to the most urgent cases of distress.



Voluntary service

It is a voluntary relief movement not prompted in any manner by desire for gain.



Unity

There can be only one Red Cross or one Red Crescent Society in any one country. It must be open to all. It must carry on its humanitarian work throughout its territory.



Neutrality

In order to continue to enjoy the confidence of all, the Movement may not take sides in hostilities or engage at any time in controversies of a political, racial, religious or ideological nature.



Universality

The International Red Cross and Red Crescent Movement, in which all Societies have equal status and share equal responsibilities and duties in helping each other, is worldwide.