HOW DOES OXFAM NOVIB ENSURE THAT PROJECT FUNDS ARE SPENT AND USED IN LINE WITH INTEGRITY?

Integrity and accountability are at the heart of our work and must therefore be a part of our DNA. This means that we are accountable for our actions, for spending our donor money wisely and for adhering to moral and ethical principles.

CORPORATE SOCIAL RESPONSIBILITY

Oxfam Novib strives for a just world, without poverty. Minimizing our own environmental impact is part of this effort. We comply with the Dutch government's sustainability criteria for all our purchases and acquisitions and, wherever possible, go beyond. For example, we ask suppliers to show us what happens in their supply chains, and we enquire about their policies on human rights, the environment and the treatment of their staff. All suppliers must comply with the Oxfam Ethical Purchase Policies. By signing these conditions, as part of the agreement, suppliers are both morally and legally obliged to adhere to our ethical and environmental standards.

CODE OF CONDUCT

Every Oxfam employee is obliged to sign an <u>internal Code of Conduct</u>. Sexual abuse, sexual harassment, misconduct and fraud are part of that Code of Conduct.

CHILD PROTECTION POLICY

Oxfam's child protection policy is a guideline which clearly emphasizes the rights children have to be protection from abuse and exploitation. It sets out the responsibility Oxfam has to ensure that all employees, volunteers, contractors and partners are given guidance about the standards of behavior and practice required of them at all times when they are in contact with children. The policy also formulates guidelines for incorporating Child Protection into program and other work, as well as internal and external reporting procedures and what the steps are when the policy is breached.

ANTI-BULLYING AND HARASSMENT POLICY

Oxfam's anti-bullying and harassment policy sets out guidelines to ensure that everyone working for Oxfam (employees and volunteers) are treated with dignity, fairness and respect. In our commitment to provide a workplace that is free from bullying and harassment, the guidelines provide definitions of bullying and harassment, as well as what steps to take for employees when faced with bullying and harassment.

SECURITY POLICY

The Oxfam security policy aims to record and communicate the guiding principles and responsibilities that form the governing framework for security risk management. The policy provides managers and staff direction and guidance to enable Oxfam's program objectives to be effectively implemented while at the same time protecting Oxfam's employees, reputation and assets from harm.

FRAUD PREVENTION AND MONITORING

As part of our approach to integrity, Oxfam Novib is committed to preventing and fighting all types of fraud and corruption within our organization and the partner organizations we work with. To enable us to live up to this commitment, Oxfam Novib has a counter fraud and corruption strategy, which includes:

- Policies against bribery and other types of corruption and holding employees and partner organizations accountable for reporting incidents.
- Maintaining, updating and enforcing additional policies and procedures for countering corruption within identified risk areas.
- Holding employees and partner organizations accountable for reporting suspected cases of corruption, providing them with suitable channels of communication and ensuring that sensitive information is treated appropriately.
- Investigating instances of alleged fraud and corruption and taking firm action against any employee or partner organization involved in proven corruption.
- Strengthening partner organizations to improve their accountability systems and procedures.

QUALITY MANAGEMENT SYSTEM

To ensure the quality of Oxfam Novib as an organization, a Quality Management System is in place, including various external and internal quality standards. We are firmly committed to doing our utmost to meet these standards, to enable the organization to perform in an efficient, professional and transparent manner. In order to achieve this, we adhere to a range of standards and tools, such as internal and external audits, as well as adhering to external standards.

INTERNAL AUDITS

Oxfam Novib uses external audits as well as internal audits to monitor compliance and continuous improvement. We perform internal audits on country offices and country clusters, and on our units in the Hague office. Internal audits follow the main rules and regulations for compliance with institutional donors.

With regard to external audits, country offices and partner organizations are supported in following up on audit results. In addition, project audits are held of a

sample of all projects, covering internal control processes around approvals and transfers to partner organizations.

EXTERNAL STANDARDS

ISO 9001:2015: Oxfam Novib is measured against a Quality Management System standard defined by the International Organization for Standardization (ISO) 9001. Our ISO 9001 certificate is based on the framework of standards set in 2015, which features the high-level structure as its new foundation. Oxfam Novib is audited against these standards on an annual basis.

Partos: Oxfam Novib also complies with the Partos 9001 standard for the development cooperation sector in the Netherlands. This special Partos standard is derived from the ISO 9001:2015 framework of standards, specifically for the development sector in the Netherlands. We are certified for Partos 9001 since 2016/17. In addition, and as a member of Partos, Oxfam Novib is committed to upholding the agreements laid down in the Partos Code of Conduct, in the interests of effective collaborative development.

Goede Doelen Nederland: We are party to and comply with the code of conduct for members of the Dutch charity sector's association Goede Doelen Nederland, on standards of behavior and actions for fundraising organizations.

CBF Recognized Charity: Introduced in 2016, this quality label for charities in the Netherlands, replaced multiple codes, guidelines and labels within the sector. The label was co-developed by Goede Doelen Nederland and is granted and monitored by the Netherlands Fundraising Regulator (CBF). Oxfam Novib has the 'CBF-Recognized Charity' label since 2016.

International Aid Transparency Initiative (IATI): Oxfam Novib complies with the IATI standard for open data and transparency and hosts the Atlas website (atlas.oxfamnovib.nl) to digitally disclose information on all our projects. By sharing our project information and making our data accessible, we aim to connect with organizations and individuals similar to us who are committed to transparency. We add value by providing insight into our work, share knowledge, join forces, and compare projects and work done by different organizations. This way, we can improve our responses and avoid duplication of efforts.

RISK MANAGEMENT

Oxfam Novib works in a complex, multi-level and dynamic environment. Working in such an environment, it is of a paramount importance to identify risks on different levels within the organization and manage them adequately. Risk management throughout the organization is therefore considered a high priority. Oxfam Novib has integrated risk management at all organizational levels, as well as in our relationships with our partner organizations.

RISKS AT THE ORGANIZATIONAL LEVEL: THE RISK REGISTER

Oxfam Novib's Risk Register identifies potential internal and external risks, classifies the risks and defines and monitors mitigation measures. We renew our risk register on an annual basis. The risk assessments are carried out with the management team and the Board of Directors, before being submitted to (the financial committee of) the Board of Supervisors. Based on the risks (and sub-risks) mentioned in the risk registers, mitigation measures are determined and monitored on an annual basis. In some cases we create internal project teams to deal with these risks.

RISKS AT THE COUNTRY LEVEL: CONTROL FRAMEWORK

All country offices have separate (financial) risk profiles. Wherever and whenever needed, Oxfam Novib supports its country offices from our office in The Hague. We minimize risks by providing support and training, and through a solid control framework. Furthermore, through the internal audit cycle (as explained above), all main risk areas are tested and checked regularly.

RISKS AT THE PROJECT LEVEL: PARTNER ASSESSMENTS

Risks within the projects we execute are managed throughout the entire project cycle. Oxfam Novib uses the Project and Partnership Risk Management (PRISMA) approach to assess and manage these risks, as part of responsible, mature and accountable project management in partnerships. The approach covers both internal and external risks, and provides a holistic, two-way (partner and Oxfam Novib, and vice versa) risk management approach. All partners we work with undergo integrity checks in order to mitigate the risk of financing non-compliant individuals or organizations.

RISKS AT THE PERSONAL LEVEL: SECURITY

As we work in high-risk, conflict-sensitive and fragile areas, the safety of our employees is paramount. Oxfam Novib provides mandatory security training for all travelling employees, a global toolkit for security management, security briefings incountry and constant monitoring of the security situation in designated areas. If a security situation does not allow our staff to work in a safe way, our projects continue to be closely monitored from another location. In order to ensure a safe working environment for all Oxfam Novib employees, the organization complies with an anti-bullying and anti-harassment policy in addition to the Code of Conduct. Oxfam Novib also provides in-house confidential counselors, who are selected and approved by the Board of Directors and the Works Council.