CODE OF CONDUCT POLICY

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Approved by:

Board of Directors, Lim Nguen Foundation

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LIM NGUEN FOUNDATION
UPLIFING LIVES

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LIM NGUEN FOUNDATION
UPLIFING LIVES

1. INTRODUCTION

Lim Nguen Foundation (LNF) is a youth-led and Refugee-Led (RLO) humanitarian and development organization committed to serving vulnerable and crisis-affected communities across South Sudan. LNF works to support internally displaced persons (IDPs), refugees, returnees, women, youth, children, and other marginalized groups through protection, resilience-building, climate-smart livelihoods, WASH, and community empowerment initiatives.

As an organization founded on lived experience and community leadership, LNF recognizes the heightened vulnerability of the populations it serves and the responsibility entrusted to it by communities, partners, and donors. Upholding the highest standards of integrity, accountability, and professionalism is therefore fundamental to its mission and operations.

This Code of Conduct defines the ethical standards, professional behavior, and accountability expectations for all individuals representing LNF. It establishes clear guidelines to ensure that all organizational activities are conducted in a manner that promotes trust, safeguards beneficiaries, and maintains the credibility and reputation of the organization.

LNF is committed to upholding the core humanitarian principles of:

- Humanity – Addressing human suffering wherever it is found, with particular attention to the most vulnerable.
- Neutrality – Not taking sides in hostilities or engaging in political, racial, religious, or ideological controversies.
- Impartiality – Providing assistance solely on the basis of need, without discrimination.
- Independence – Maintaining autonomy from political, economic, military, or other external agendas.

All LNF representatives must conduct themselves in a manner that protects the dignity, rights, safety, and well-being of the communities we serve. Every action taken under the name of LNF must reflect the organization's commitment to ethical conduct, safeguarding, transparency, and respect for human rights.

2. PURPOSE

The purpose of this Code of Conduct is to establish clear ethical standards and behavioral expectations that guide all individuals representing Lim Nguen Foundation (LNF) in the performance of their duties. This policy serves as a foundation for responsible, transparent, and accountable humanitarian action.

Specifically, this Code of Conduct aims to:

- Promote ethical and professional behavior by defining acceptable standards of conduct that reflect integrity, respect, fairness, and responsibility in all organizational activities.
- Prevent misconduct, abuse, fraud, corruption, and exploitation by clearly outlining prohibited behaviors and reinforcing a zero-tolerance approach to violations of ethical standards.
- Protect beneficiaries, staff, volunteers, and partners from harm by establishing safeguards that reduce risks of sexual exploitation and abuse (SEA), harassment, discrimination, and other forms of misconduct.
- Ensure compliance with national laws, humanitarian principles, and donor regulations, including adherence to South Sudan legal frameworks and applicable international standards governing humanitarian and development work.
- Strengthen institutional integrity and accountability by promoting transparency, responsible stewardship of resources, and a culture of reporting and addressing wrongdoing.
- Foster trust and credibility with affected communities, partners, donors, and stakeholders by demonstrating LNF's commitment to responsible and principled humanitarian action.
- Provide a clear framework for disciplinary action and corrective measures in cases where violations occur, ensuring fairness, due process, and consistency.

This Code of Conduct reinforces LNF's commitment to safeguarding, ethical leadership, and the responsible delivery of assistance to vulnerable populations.

3. SCOPE

This Code of Conduct applies to all individuals and entities acting on behalf of Lim Nguen Foundation (LNF), regardless of contractual status or duration of engagement. Compliance with this policy is mandatory and forms part of the conditions of employment, partnership, or collaboration with LNF.

This policy applies to:

- Members of the Board of Directors
- The Executive Director
- Employees (full-time, part-time, and project-based staff)
- Volunteers
- Consultants and advisors
- Contractors and service providers
- Partner organizations and implementing partners
- Temporary staff, interns, and casual workers

All individuals covered under this policy are expected to adhere to its provisions at all times when representing or associated with LNF.

The Code of Conduct applies:
During official working hour**s**

- Outside working hours when representing LNF or engaged in activities related to LNF
- During travel, field missions, community engagement activities, trainings, workshops, and public events
- In both physical and digital environments, including email communications, social media platforms, virtual meetings, and other online engagements
- This policy also applies to behavior that may occur outside the workplace but has a direct impact on LNF's reputation, operations, beneficiaries, or working environment.
- All covered individuals are required to acknowledge, understand, and comply with this Code as a condition of their association with LNF.

4. CORE VALUES AND PRINCIPLES

All LNF personnel must uphold the following values:

4.1 Integrity

Act honestly, transparently, and responsibly in all professional activities.

4.2 Respect for Human Dignity

Treat all individuals with dignity, fairness, and respect, regardless of: Gender; Ethnicity, Religion, Disability, Political opinion & Social status

4.3 Accountability

Take responsibility for decisions, actions, and use of resources.

4.4 Professionalism

Perform duties competently, ethically, and in line with organizational policies.

4.5 Do No Harm

Ensure that all interventions avoid causing physical, psychological, social, or economic harm.

5. EXPECTED STANDARDS OF CONDUCT

All LNF personnel are required to uphold the highest standards of integrity, professionalism, and accountability in the performance of their duties. The following standards apply to all individuals covered under this Code of Conduct:

5.1 Compliance with Laws and Policies

Comply with the Constitution and laws of the Republic of South Sudan and any applicable local regulations in areas of operation.

Follow all donor rules, funding agreements, and contractual obligations associated with projects and partnerships.

Adhere strictly to all LNF internal policies, procedures, financial regulations, safeguarding standards, and operational guidelines.

Cooperate fully with internal and external audits, reviews, and investigations.

Failure to comply with legal and policy requirements may result in disciplinary action and possible legal consequences.

5.2 Protection of Beneficiaries

LNF personnel have a duty of care toward the communities they serve. All personnel shall:

- Safeguard vulnerable individuals from all forms of exploitation, abuse, neglect, and harm.
- Promote safe, inclusive, and accountable programming practices that reduce risks to beneficiaries.
- Avoid any behavior that may place beneficiaries at risk or create perceptions of exploitation or favoritism.
- Immediately report any suspected misconduct, safeguarding concerns, or violations of protection standards in accordance with LNF reporting procedures.

- The safety and dignity of beneficiaries must always be prioritized in decision-making and program implementation.

5.3 Non-Discrimination and Impartiality

- Provide assistance impartially, based solely on need and vulnerability.
- Avoid discrimination based on gender, ethnicity, religion, disability, political affiliation, age, social status, or any other protected characteristic.
- Refrain from favoritism, nepotism, or bias in service delivery, recruitment, procurement, or beneficiary selection.
- Promote equality, inclusion, and respect in all interactions with communities and colleagues.
- Lim Nguen Foundation is committed to ensuring equal and fair access to assistance and opportunities.

5.4 Respectful Workplace Behavior

LNF is committed to maintaining a safe, inclusive, and respectful working environment. All personnel shall:

- Maintain a workplace free from harassment, intimidation, and hostility.
- Refrain from bullying, verbal abuse, threats, or degrading behavior.
- Respect professional boundaries and maintain appropriate conduct with colleagues and partners.
- Promote teamwork, cooperation, and open communication.
- Address disagreements professionally and constructively.
- Any form of workplace harassment or abuse will not be tolerated.

5.5 Confidentiality and Data Protection

All LNF personnel are responsible for safeguarding sensitive information. Personnel shall:

- Protect personal data and confidential information relating to beneficiaries, staff, donors, and partners.
- Avoid unauthorized disclosure of sensitive information to third parties.
- Use organizational data only for legitimate work-related purposes.
- Ensure that physical documents are securely stored and that digital data is password-protected and handled responsibly.
- Confidentiality obligations continue even after the termination of employment or engagement with LNF.

6. PROHIBITED CONDUCT

All personnel and representatives of Lim Nguen Foundation (LNF) are expected to conduct themselves in a professional and ethical manner at all times. The following behaviors are strictly prohibited and constitute violations of this Code of Conduct. Any confirmed breach may result in disciplinary action, including termination, legal proceedings, and reporting to relevant authorities or donors.

6.1 Sexual Exploitation and Abuse (SEA)

LNF has zero tolerance for sexual exploitation and abuse. Engaging in any form of sexual activity with beneficiaries, exchanging assistance for sexual favors, or engaging in sexual activity with persons under 18 years of age is strictly prohibited. Any abuse of authority, position, or power to gain sexual advantage over beneficiaries, colleagues, or partners is also forbidden. Personnel must maintain professional boundaries at all times and ensure that the dignity and safety of all individuals, particularly vulnerable populations, are protected.

6.2 Harassment

Harassment of any form, including sexual harassment, verbal abuse, psychological intimidation, bullying, or hostile and degrading behavior, is strictly prohibited. LNF is committed to maintaining a safe, respectful, and inclusive work environment. All personnel must treat colleagues, partners, and beneficiaries with courtesy, professionalism, and respect, and refrain from actions or language that could cause distress, fear, or humiliation.

6.3 Fraud and Corruption

Theft, embezzlement, misappropriation, or misuse of LNF funds, assets, or resources is strictly prohibited. Personnel are forbidden from falsifying documents, manipulating procurement processes, offering or accepting bribes or kickbacks, or engaging in any form of corruption. All financial and operational activities must be transparent, properly documented, and in compliance with donor rules, organizational procedures, and national laws.

6.4 Conflict of Interest

All personnel must avoid situations where personal interests could conflict with their responsibilities to LNF. Undisclosed financial interests, awarding contracts to family members, or using organizational resources for personal gain are strictly prohibited. Individuals must disclose any potential conflicts of interest immediately and recuse themselves from decisions or activities where a conflict exists.

6.5 Abuse of Authority

Any misuse of authority, position, or influence for personal gain, coercion, or intimidation of staff, volunteers, beneficiaries, or partners is prohibited. Leaders and managers must exercise authority fairly and responsibly, ensuring decisions are made in the best interest of the organization and the communities it serves.

6.6 Substance Abuse

Working under the influence of drugs or alcohol, or the possession, distribution, or use of illegal substances while on duty or representing LNF, is strictly prohibited. Personnel are expected to maintain a professional and safe working environment at all times.

7. USE OF ORGANIZATIONAL RESOURCES

All personnel of Lim Nguen Foundation (LNF) are responsible for the careful and responsible use of organizational resources, including funds, assets, equipment, vehicles, and property. LNF resources must be used solely for official organizational purposes and in support of approved programs and activities.

Personnel are required to protect all assets from loss, theft, damage, or misuse. This includes ensuring proper storage, maintenance, and handling of equipment, vehicles, and materials. All financial transactions, procurement processes, and asset usage must be properly documented and accounted for in accordance with LNF financial and operational procedures.

Misuse or unauthorized use of organizational resources, including vehicles, equipment, technology, or funds, is strictly prohibited and may result in disciplinary action, restitution, and reporting to relevant authorities or donors. All personnel have a duty to report any suspected misuse or misappropriation immediately to their supervisor or through established reporting mechanisms.

8. SOCIAL MEDIA AND PUBLIC REPRESENTATION

All personnel representing LNF are expected to maintain the organization’s reputation and credibility in all public communications, whether online, in-person, or through media engagements. Employees, volunteers, and partners must represent the organization responsibly and professionally, ensuring that their conduct aligns with LNF values and humanitarian principles.

Personnel must avoid sharing confidential or sensitive information about LNF, beneficiaries, partners, or staff on social media or other public platforms. Posting discriminatory, abusive,

offensive, or political content that could harm the organization's reputation, compromise its neutrality, or create perceptions of bias is strictly prohibited.

All public statements, posts, or communications should reflect LNF's commitment to ethical, transparent, and accountable humanitarian action. Personnel are encouraged to seek guidance from supervisors or communications officers if uncertain about public representation or the use of social media in relation to organizational activities.

9. REPORTING MISCONDUCT

All staff and representatives have a duty to report violations of this Code.

Reports may be made to:

- Executive Director
- Board Chairperson
- Designated Safeguarding or PSEA Focal Point
- Confidential reporting email or complaint box
- Reports may be made anonymously.

10. WHISTLEBLOWER PROTECTION

Lim Nguen Foundation (LNF) is committed to creating a safe environment where individuals feel empowered to report misconduct, violations of this Code, or any unethical behavior. LNF strictly prohibits any form of retaliation, harassment, or discrimination against personnel who report concerns in good faith or participate as witnesses in investigations.

Protection measures ensure that whistleblowers can report issues confidentially and without fear of reprisal. Any individual found engaging in retaliation against a reporter or witness will face disciplinary action, which may include suspension, termination, or legal consequences. LNF emphasizes that safeguarding whistleblowers is a fundamental part of maintaining organizational integrity and accountability.

11. INVESTIGATION PROCEDURES

Upon receipt of a complaint, LNF will conduct a timely and fair process to determine the validity of the allegation. A preliminary review will first assess the nature and urgency of the complaint. If further action is required, a confidential investigation will follow, led by designated personnel or an independent investigator to ensure objectivity and impartiality.

All findings will be carefully documented and reviewed, and appropriate corrective or disciplinary action will be taken based on the outcome. Serious cases, including fraud, corruption, sexual exploitation, or abuse, may be reported to donors, regulatory authorities, or law enforcement as

required by law or contractual obligations. LNF is committed to ensuring that investigations are conducted with transparency, confidentiality, and respect for the rights of all parties involved.

12. DISCIPLINARY MEASURES

Violations of this Code of Conduct are taken seriously and may result in a range of disciplinary actions depending on the severity of the misconduct. Possible measures include verbal or written warnings, suspension, termination of employment or engagement, recovery of misappropriated funds, and legal action.

In cases where donor rules or national laws are implicated, violations may also be reported to relevant authorities or funding partners. The severity of sanctions will be proportionate to the seriousness of the violation, ensuring fairness and consistency in enforcing organizational standards. LNF is committed to applying disciplinary measures in a transparent, objective, and accountable manner.

13. TRAINING AND AWARENESS

LNF recognizes that the effectiveness of this Code of Conduct depends on personnel understanding and internalizing its principles. All staff, volunteers, consultants, and partners will be oriented on this Code upon engagement and are required to acknowledge their understanding and acceptance in writing.

Periodic refresher training will be conducted to reinforce awareness, address emerging risks, and update personnel on any changes in policies or procedures. New employees, interns, and temporary staff must sign a declaration confirming their understanding and commitment to comply with the Code before commencing their duties.

Training and awareness programs are designed to foster a culture of ethical behavior, accountability, and respect, ensuring that all LNF personnel consistently uphold the highest standards of conduct in their interactions with beneficiaries, colleagues, and partners.

14. POLICY REVIEW

This Code of Conduct is a living document and shall be reviewed at least every two years to ensure its continued relevance, effectiveness, and alignment with best practices in humanitarian operations. Reviews may also be conducted sooner if required due to changes in donor requirements, updates to national or international laws, organizational restructuring, or emerging risks identified in the course of operations.

The review process will involve the Executive Director, relevant management staff, and, where appropriate, the Board of Directors or designated governance bodies. Any revisions or updates resulting from the review will be formally approved, documented, communicated to all personnel, and reflected in updated training and awareness programs. This ensures that all staff, volunteers, consultants, and partners are continuously informed and compliant with current standards of ethical and professional conduct.

15. DECLARATION OF COMPLIANCE

I, the undersigned, confirm that I have read, understood, and agree to comply with the Lim Nguen Foundation Policy.

Name: _____
Position: _____
Signature: _____
Date: _____

Approved By:

Name: Yoal Wuol Lim

Position: Chairperson Board of Directors

Signature: _____

LIM NGUEN FOUNDATION
"UPLIFTING LIVES"

Date: 10 December 2025