



# REC Caucasus Ethics Policy

2024

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## **1. Purpose**

The REC Caucasus Ethics Policy (2024) establishes the principles, standards of conduct, and institutional mechanisms that guide ethical behavior across all activities implemented by REC Caucasus. The Policy aims to promote integrity, accountability, transparency, professionalism, and respect in all organizational operations and relationships with staff, consultants, partners, beneficiaries, service providers, donors, and stakeholders.

The Policy applies to all REC Caucasus personnel, including employees, management, consultants, interns, volunteers, contractors, and implementing partners engaged in REC Caucasus-supported activities.

## **2. Objectives**

The objectives of this Policy are to promote a culture of integrity, ethical conduct, and accountability; prevent fraud, corruption, conflicts of interest, harassment, discrimination, retaliation, and other forms of misconduct; ensure fair, transparent, and respectful workplace practices; establish clear procedures for reporting, reviewing, and addressing ethical concerns and misconduct allegations; protect individuals who report concerns in good faith from retaliation; and strengthen institutional credibility and compliance with international standards and donor requirements.

## **3. Guiding Principles**

REC Caucasus personnel shall uphold the principles of integrity and honesty in all professional activities, independence and impartiality in decision-making, accountability for actions and use of organizational resources, respect for diversity, dignity, equality, and human rights, confidentiality and responsible handling of information, transparency and avoidance of conflicts of interest, and compliance with applicable laws, regulations, and organizational policies.

## **4. Prohibited Conduct**

REC Caucasus maintains zero tolerance for fraud, corruption, bribery, financial mismanagement, abuse of authority, misuse of organizational resources, undisclosed conflicts of interest, harassment, discrimination, bullying, intimidation, breaches of confidentiality, retaliation against whistleblowers or complainants, procurement irregularities, and any conduct that undermines the integrity, reputation, or objectives of REC Caucasus.

## 5. Reporting Ethical Concerns

REC Caucasus encourages staff members, consultants, project personnel, partners, service providers, beneficiaries, and other external stakeholders to report suspected misconduct, unethical behavior, conflicts of interest, fraud, corruption, harassment, discrimination, misuse of organizational resources, or other violations of internal policies and procedures through designated reporting channels. Reports may be submitted confidentially through official email channels, written submissions, internal grievance or ethics reporting mechanisms, or other formally designated communication channels established by REC Caucasus (See Annex 1).

Anonymous reports (See Annex 2) may also be reviewed where sufficient information is provided to allow preliminary assessment. All reports shall be handled confidentially and in accordance with principles of fairness, impartiality, and due process.

REC Caucasus maintains a Misconduct Reporting and Resolution Log (See Annex 3) to document and monitor reported ethical concerns, complaints, investigations, corrective actions, outcomes, and lessons learned. The log includes information such as case reference number, date reported, type and category of violation, persons or units involved, investigation status, actions taken, findings, disciplinary or corrective measures applied, financial implications where applicable, closure status, and preventive measures introduced to strengthen organizational integrity and accountability.

In accordance with the organizational structure of REC Caucasus, the following roles and responsibilities apply in relation to reporting and handling ethical concerns:

- The Executive Director provides overall oversight of organizational integrity, ethical compliance, and accountability mechanisms, and ensures that ethical concerns are addressed appropriately and in line with internal procedures.
- The HR Officer serves as a focal point for staff-related grievances, workplace conduct concerns, and issues related to professional behavior, confidentiality, non-discrimination, and staff welfare. The HR Officer may coordinate preliminary review and referral of cases to the appropriate management level.
- The Internal Auditor (to be hired) may receive or review serious reports related to fraud, misuse of funds, procurement irregularities, internal control weaknesses, financial misconduct, or non-compliance with organizational procedures, and may conduct independent assessments where necessary.
- The Fin-Admin Head, Financial Officer, and Procurement and Accounting Specialist support the review of concerns related to financial management, procurement processes, payments, disbursements, and compliance with financial control procedures.
- Programme Managers, Heads of Units, and Project Coordinators are responsible for promoting ethical conduct within their respective teams and projects, ensuring that concerns raised by personnel are communicated through appropriate channels and addressed in a timely and impartial manner.

- The Development Head and Partnerships Advisor may support the handling of concerns involving external stakeholders, partnerships, donor relations, or cooperation processes where relevant.
- All staff members are expected to cooperate with reviews and investigations conducted in relation to reported concerns, maintain confidentiality, and refrain from retaliation against individuals who report concerns in good faith.

Where necessary, reported concerns may be escalated to senior management, the Internal Auditor (to be hired), or other authorized bodies within the governance structure of REC Caucasus for further review and appropriate action.

## **Internal Conduct Review Committee**

### **6. Establishment**

REC Caucasus establishes an Internal Conduct Review Committee (ICRC) as the internal oversight body responsible for reviewing ethics-related concerns, allegations of misconduct, and compliance with this Policy.

The Committee operates independently, objectively, and confidentially in carrying out its functions.

### **7. Composition**

The Internal Conduct Review Committee shall consist of designated representatives appointed by REC Caucasus management. Committee composition should ensure impartiality, professional competence, confidentiality, and avoidance of conflicts of interest.

Where necessary, external experts or advisors may be consulted to support specific reviews or investigations. Members directly involved in a reported matter shall recuse themselves from related deliberations and decisions.

### **8. Roles and Responsibilities of the Internal Conduct Review Committee**

The Internal Conduct Review Committee is composed of the following members: the Executive Director (Chair), HR Officer, Programme Manager (rotating), Internal Auditor (to be hired), Fin-Admin Head, Financial Officer and Procurement and Accounting Specialist.

The Internal Conduct Review Committee is responsible for monitoring implementation of the REC Caucasus Ethics Policy and related procedures and for promoting ethical standards and organizational integrity across REC Caucasus operations. The Committee receives, reviews, and assesses reports of alleged misconduct, ethical violations, and prohibited practices and determines whether sufficient grounds exist for further review or investigation.

Where necessary, the Committee may coordinate or recommend internal reviews and fact-finding processes and recommend corrective, disciplinary, administrative, or preventive measures as appropriate. The Committee also supports institutional learning by identifying recurring ethics or compliance risks and recommending awareness-raising activities, training, and policy improvements aimed at strengthening organizational integrity systems.

In carrying out its functions, the Committee safeguards confidentiality of reported information and promotes protection against retaliation for individuals reporting concerns in good faith. The Committee also maintains appropriate records of reviewed cases and actions taken and prepares annual ethics oversight summaries and institutional reporting documentation.

## **9. Meetings and Annual Reporting**

The Internal Conduct Review Committee shall meet at least once annually in April to review ethics and conduct matters concerning the previous calendar year and to prepare the corresponding annual internal report.

Additional meetings may be convened at any time as circumstances require, including in response to reported or urgent ethics-related matters, misconduct allegations, or other issues requiring timely review or action.

During the annual April meeting, the Committee shall review ethics and conduct matters concerning the previous calendar year, including reported allegations and complaints, actions taken and resolutions implemented, emerging institutional risks and trends, and the effectiveness of existing ethics and compliance measures.

Following this review, the Committee shall prepare an annual internal report summarizing the overall state of ethics and integrity oversight during the previous year, including general categories of issues reviewed, actions and recommendations undertaken, and institutional measures proposed for strengthening ethical compliance and accountability.

All reports shall maintain confidentiality and shall not disclose sensitive personal information except where legally or institutionally required.

## **Confidentiality and Non-Retaliation**

REC Caucus strictly prohibits retaliation against any individual who reports concerns or participates in reviews or investigations in good faith.

All ethics-related information shall be treated confidentially and accessed only by authorized individuals involved in the review process.

## **Policy Review**

This Policy shall be reviewed periodically and updated as necessary to ensure continued alignment with applicable legal requirements, donor expectations, and international good governance standards.

## **Entry into Force**

This Policy enters into force upon approval by REC Caucasus management and applies to all relevant operations and activities thereafter.

The Policy along with its annexes is approved and signed by REC Caucasus Executive Director



Sophiko Akhonadze

Executive Director

# Annex 1. Non-Anonymous Ethical Concern Reporting Form

## Ethical Concern / Misconduct Reporting Form

### 1. Information About the Reporting Person

**Full Name:** \_\_\_\_\_

**Position / Organization:** \_\_\_\_\_

**Department / Project / Unit:** \_\_\_\_\_

**Email Address:** \_\_\_\_\_

**Phone Number:** \_\_\_\_\_

### 2. Type of Concern Being Reported

- Fraud or financial misconduct
- Corruption or bribery
- Conflict of interest
- Procurement irregularities
- Harassment or discrimination
- Abuse of authority or misconduct
- Violation of internal policies or procedures
- Misuse of organizational resources
- Retaliation against reporting person
- Safeguards or ethical compliance issue
- Other: \_\_\_\_\_

### 3. Description of the Concern

Please describe the incident, concern, or suspected misconduct in detail, including relevant facts, dates, actions, and circumstances.

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### 4. Person(s) Involved

Please identify the person(s), department(s), contractor(s), or external party/parties involved, if known.

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5. Date and Location of Incident

**Date(s):** \_\_\_\_\_

**Location / Project / Office:** \_\_\_\_\_

6. Witnesses or Supporting Information

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7. Supporting Documents or Evidence Attached

Yes

No

If yes, please list the attached documents/materials:

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8. Confidentiality Statement

REC Caucusus will handle reports confidentially and in accordance with principles of fairness, impartiality, and due process. Information will be shared only with authorized persons involved in the review and handling of the concern.

9. Declaration

I confirm that the information provided in this report is true and accurate to the best of my knowledge and is submitted in good faith.

**Name:** \_\_\_\_\_

**Signature:** \_\_\_\_\_

**Date:** \_\_\_\_\_

## Annex 2. Anonymous Ethical Concern Reporting Form

Anonymous Ethical Concern Reporting Form

1. Type of Concern Being Reported

- Fraud or financial misconduct
- Corruption or bribery
- Conflict of interest
- Procurement irregularities
- Harassment or discrimination
- Abuse of authority or misconduct
- Violation of internal policies or procedures
- Misuse of organizational resources
- Retaliation against reporting person
- Safeguards or ethical compliance issue
- Other: \_\_\_\_\_

**2. Description of the Concern**

Please describe the incident, concern, or suspected misconduct in as much detail as possible, including relevant facts, dates, actions, and circumstances.

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**3. Person(s) Involved**

Please identify the person(s), department(s), contractor(s), or external party/parties involved, if known.

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**4. Date and Location of Incident**

**Date(s):** \_\_\_\_\_

**Location / Project / Office:** \_\_\_\_\_

**5. Witnesses or Supporting Information**

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**6. Supporting Documents or Evidence Attached**

- Yes
- No

If yes, please list the attached documents/materials:

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### 7. Confidentiality Statement

Anonymous reports may be reviewed where sufficient information is provided to allow preliminary assessment. REC Caucasus will handle reports confidentially and in accordance with principles of fairness, impartiality, and due process.

### 8. Optional Contact Information

If you wish to be contacted for clarification or follow-up, you may provide contact details below. Providing this information is optional.

**Email or Phone Number (optional):** \_\_\_\_\_

**Preferred Method of Contact (optional):** \_\_\_\_\_

Annex 3. Misconduct Reporting and Resolution Log

Case Reference No.	Date Reported	Anonymous Complaint (Yes/No)	Type of Violation	Category	Brief Description of Allegation	Source of Complaint / Detection	Person(s) / Unit Involved	Initial Risk Level	Investigation Initiated (Yes/No)	Investigating Body / Officer	Internal Audit (To be established) Reference	Internal Conduct Review Committee Meeting Date	Key Actions Taken	Current Status	Outcome / Findings	Disciplinary or Corrective Measures Applied	Financial Loss Identified (if applicable)	Amount Recovered (if applicable)	Date Closed	Lessons Learned / Preventive Measures	Remarks