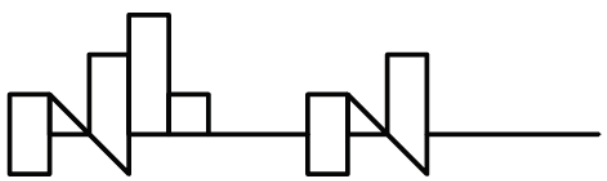


Iceland 
Liechtenstein **Norway**
Norway grants **grants**

ANNEX III
ETHICAL GUIDELINES

INTRODUCTION AND GENERAL RULES

1. Unless otherwise specified, all terms used in the Ethical Guidelines have the same meaning as in the Project Contract General Conditions.
2. All information should be considered and treated as confidential, unless specifically stated otherwise, and should not be disclosed to any non-authorised personnel or members of the public.
3. The use of the Ethical Guidelines aims to mitigate any risk of abuse of power or ethics dumping by the Project Partners and their staff. The Ethical Guidelines also set the key measures to be taken by the FO in case abusive practices occur, in order to reduce their negative effects and protect the public image of the EEA and the Norway Grants. In case of any ethical violations, the FO will notify the FMO, and, if necessary, the European and national ethics bodies of such violations.
4. The compliance with the Ethical Guidelines shall be required during the entire Project implementation period from everyone involved in the Project. As stipulated in paragraph 3 of this Article, the FO will report to the FMO immediately any circumstance that may create a potential conflict of interest, violation, abuse or any irregularity.
5. Project Partners are committed to the rigorous investigation of any allegation of fraud, corruption and bribery within their staff, and where fraud, corruption, bribery or other criminal act is proven, to ensure that wrongdoers are appropriately dealt with.
6. In instances where such a question might subsist after full disclosure, corrective steps shall be taken to mitigate the impact and to avoid the problem in the future. Without prejudice to employees' rights under national laws, the Project Partners shall replace immediately any member of its staff involved in such a situation.
7. Investigations and measures adopted to solve any problem should be executed professionally and confidentially and protect the anonymity of the whistle-blowers.

CODE OF CONDUCT

VALUES AND RESPECT OF HUMAN RIGHTS

1. Project Partners' staff and any person participating in the Project implementation are equal before the law. Any discrimination based on any ground such as sex, race, colour, ethnic or social origin, genetic features, language, religion or belief, political or any other opinion, membership of a national minority, property, birth, disability, age or sexual orientation shall be prohibited.
2. Focusing on individual rights alongside those of the larger group or culture, prudence dictates one's human dignity and personal rights secured through proper moral behaviour.
3. Project Partners ensure the honest and equal treatment of Project Partners' staff and of any person involved in the Project implementation:
 - (1) Project Partners do not hire or fire, reward or punish, award or deny contracts based on personal considerations, including but not limited to, favouritism, nepotism, or bribery.
 - (2) Project Partners do not discriminate against others based on, but not limited to, gender, race, age, religion, disability, nationality, or sexual orientation.
 - (3) Project Partners apply the rules of Ethical Guidelines without favouritism or prejudice.
4. Project Partners' value is to demonstrate professionalism, integrity, respect, honesty and ability to work in a team. In this respect, Project Partners will implement the Project forming a team

composed by people from different organisations, countries and sometimes cultures in order to disseminate and implement the funds entrusted by the Donor in the best possible way.

5. Each Project Partners' staff is expected to:
 - (1) treat each other with fairness, dignity, and respect
 - (2) display utmost courtesy and tolerance
 - (3) respect the individuality and personal values of their colleagues
 - (4) be inclusive, supportive and listen actively to others;
 - (5) be respectful and mindful of individual work/life balance goals
 - (6) take responsibility for own safety, and that of their colleagues, in the workplace
 - (7) abide by all applicable health, safety, environmental laws and policies
 - (8) report all health, safety, or environmental hazards.

LAW

1. Project Partners, their staff and any person involved in the Project implementation are required to comply with ethical standards foreseen in these Guidelines, the common values of respect for human dignity, freedom, democracy, equality, the rule of law and respect for human rights, including the rights of persons belonging to minorities and national law.
2. Project Partners, their staff and any person involved in Project's implementation abide by rules of UN and ILO conventions, EU law and national law of the country concerned. In particular, Project Partners, their staff and any person involved in the Project implementation abide by rules of the UN Universal Declaration of Human Rights and follow the UN Convention on the Rights of Children and ILO eight conventions on fundamental labour standards, such as child labour, forced labour, unions and collective bargaining, and discrimination in the workplace.

CULTURE

1. Project Partners aim to fulfil all Donors' and FO's requirements and rules set for the Project.
2. Project Partners' main goal is to implement and close the Project, by acting based on the highest standards, ensuring the best possible results and benefits for the Project's beneficiaries and thanks to it, for the social and business environment.
3. During the project implementation period, Project Partners shall comply with the following requirements of ethical behaviour:
 - (1) mutual respect, openness and frankness;
 - (2) treating the entrusted funds with the utmost care and caution;
 - (3) responsible attitude towards every Project activity;
 - (4) proactive attitude to tasks and inspiring one another;
 - (5) taking into consideration each stakeholder;
 - (6) designing user-friendly procedures;
 - (7) thinking about final results of their work;
 - (8) being professional.
4. Project Partners shall recognise that everyone is entitled to work in a harassment-free environment. Display of physical anger, sarcasm, ridicule or belittlement, whether in private or in front of a group, is unacceptable.

ANTI-CORRUPTION

1. It will be the general policy during the Project implementation to purchase all materials and supplies on the basis of price, quality and service. It is an offence under national laws for any

individual to pay, offer, request or accept a bribe. A Project Partner's staff member may also commit an offense if an individual gives or offers a bribe with the intention of retaining or obtaining business for the Project or gaining a benefit or advantage on behalf of the Project.

2. Project Partners must have a zero tolerance policy towards corruption, they will neither pay nor accept any bribe, gratuity or similar payment (such as facilitation payment) from anyone in connection with the Project's business.
3. If an employee is in doubt as to whether the acceptance of any gift, benefit or hospitality could be perceived to give rise to a potential conflict of interest, he/she should inform his/her own supervisor under the Project or Lead Partner Project's Key Personnel.
4. Any Project Partner's staff member who has (or believes that he/she may have) a personal or financial interest which might conflict with these Ethical Guidelines, should immediately make all the facts known to the Lead Partner's project manager or to his/her direct supervisor under the Project.
5. Project Partners must take a very serious view of any fraudulent or other improper behaviour, corruption, bribery or other serious malpractice and general abuse occurring in the workplace. Any Project Partners' staff suspected of such behaviour will be investigated under the relevant entity's disciplinary policies.
6. A Project Partners' staff who become aware of possible malpractice should report it to the Lead Partner's project manager or to their direct supervisor under the Project. Any Project Partner's staff making such a disclosure will be protected by national laws and legislation and the matter will be treated with the utmost confidentiality and will be immediately investigated. Following an investigation, the Project Partners' staff raising the initial concern will be informed of the outcome of the investigation, and of any proposed actions. If the outcome of any investigation is that the complaint has been brought maliciously this will be regarded as a serious disciplinary matter and will be dealt with under the Project Partner's managing personnel decision.