

CODE OF ETHICAL GUIDELINES OF THE COMMONWEALTH TELECOMMUNICATIONS ORGANISATION

A PREAMBLE

1. We are the CTO, the oldest and largest Commonwealth organisation in the field of Information and Communication Technologies (ICTs) that uses its experience and expertise to support members in using ICTs to deliver effective development interventions that enrich, empower and emancipate all peoples within the Commonwealth and beyond.
2. Our operations and reputation are based on integrity and transparency.
3. We value the trust and confidence of our stakeholders and consider our reputation and relationships as an important element of our long term sustainability.
4. We recognise our obligations to our wider stakeholder network including members, employees, partners and, particularly, the people living in our member countries.
5. We require and endeavour to maintain the highest ethical standards in carrying out our activities, and our employees are expected to conduct themselves according to the same ethical standards. We will ensure the protection of employees in instances where compliance with our code of ethics jeopardises the reaching of financial or other targets.
6. We will pursue all our activities with respect for diversity and human rights.
7. This Code of Ethical Guidelines (Code) has been adopted by the CTO to provide a framework through which its relationships with members, partners and other interlocutors can be conducted.
8. We will treat very seriously a breach of these guidelines and take appropriate remedial action.
9. We wish to work with other organisations that aspire to achieve similar standards.

B PURPOSE AND THE USE OF THIS CODE

- 1 This code:
 - describes the principles that govern our membership and partnership practices.
 - sets out our responsibilities towards our stakeholders.
 - specifies how employees are expected to act in relation to the CTO's values as well as the laws and regulations that control our operations.
 - applies to all staff and all our membership, business, and operational activities
 - should be used alongside other CTO policies, guidance, rules and contract documents.
 - provides guidance to help resolve dilemmas about business conduct and points employees where they can obtain further assistance.
 - cannot address or anticipate all likely ethical dilemmas. It is intended to guide staff in how to act with integrity, good conscience and judgement based on the CTO's core values at all times.
 - imposes an obligation on employees to report actual or potential infringements of this code.
- 2 Management has the additional responsibilities of
 - acting as role models by visibly demonstrating support for and adherence to this Code.
 - ensuring that employees receive training and guidance on compliance with this Code and related legal standards in the context of their individual roles within the CTO.
 - creating an environment that encourage open discussion on ethical standards and concerns.

C RELATIONS WITH EMPLOYEES

- 1 We aim to be an employer of choice through the creation of a positive, responsible, open and exemplary working environment.
- 2 We value diversity.
- 3 Our relations with employees are based on respect for diversity, the dignity of the individual, and fair treatment for all.
- 4 We strive to maintain an environment that is based on merit and inclusiveness.
- 5 We will recruit and promote employees on the basis of their suitability for the job and organisational needs without discrimination such as on race, religion, national or ethnic origin, colour, gender, sexual orientation, age, marital status or disability unrelated to the tasks in hand, union membership or political affiliation.
- 6 We expect employees to conduct their relationships with co-workers, customers, stakeholders, and partners with respect for all people without regard to differences or similarities.
- 7 We will explain the purpose of individual jobs, foster communication and involve employees in improving their work and that of the CTO as a whole.
- 8 We will provide employees with opportunities to enhance their skills and capabilities, enabling them to develop fulfilling careers and to maximise their contribution to the CTO.
- 9 In recognition of the efforts of the employees, we will maintain a framework of fair and just remuneration policies and structures. Pay systems will seek to recognise both the contribution of the individuals and the performances of the teams they belong to.
- 10 We place a high priority on the health, safety and security of employees and their work environment in line with the best industrial practices. We will act to prevent the exposure of employees to personal security risks at all times and we require the completion of risk assessments for all overseas travel.
- 11 We provide voluntary health promotion programmes designed to enhance employees' well-being, productivity and personal safety.
- 12 Employees for their part, have a duty to take every reasonable precaution to avoid injury to themselves, their colleagues and members of the public. This includes reporting to work free from the influence of any substance that could inhibit safe and acceptable conduct.
- 13 We prohibit the use of child or forced labour in any of our operations and strive to influence our stakeholders to act similarly.
- 14 Organisation time, physical and intellectual property should be used for business purposes only unless permission has been granted otherwise.
- 15 We respect employee's privacy and dignity. We will only collect and retain personal information from employees that is required for the effective operation of the CTO or as required by law. We will keep that information confidential and release it only to those who have a legitimate need to know.
- 16 Information received by employees in the course of their duties or in the course of business dealings may not be used for gain for themselves, either directly or indirectly. This obligation shall be in addition to any obligations that current laws shall impose on employees.
- 17 Employees shall not become involved with any activity for personal gain which is in conflict with the interests of the CTO. Any personal interests, either direct or indirect, in relation to the CTO's business, must be disclosed.

- 18 Employees shall not work, paid or unpaid, simultaneously for another person or organisation without the expressed permission of the CTO. It is the responsibility of the employee to check whether a situation of conflict of interest exists.
- 19 We will not tolerate any sexual, physical or mental harassment, or bullying of our employees.
- 20 Employees are expected to be open, honest and courteous with each other.
- 21 If an employee has a concern that cannot be resolved with his/her line manager, the CTO has a grievance procedure for dealing promptly and fairly with the matters ensuring the employee has a fair hearing of any grievance, has a right to take the issue to higher management where appropriate or deemed necessary, and has the right to appeal.
- 22 We will maintain communications with employees individually as well as through the groupings they work in.
- 23 We will consult with employees on matters of importance. We recognise the freedom of association of employees and the employees' right to join labour unions.
- 24 We are committed to providing fair pay, benefits, and equitable terms and conditions of employment. We will seek agreement for changing those terms that need amending to meet business needs or changing operational contexts.
- 25 We encourage our employees to achieve a balance between work and private life, and actively support them to reconcile family lives and careers.

D THE CTO'S COMMITMENT TO MEMBERS AND PARTNERS

- 1 Our reputation and the loyalty of our members and partners depend on the way we deliver services and interact with them. The confidence that members have in our professional excellence, competence, and the quality of its services, as well as their belief that our services provide value, are vital to the CTO's sustainability.
- 2 We will treat all our members and partners with respect, honesty and fairness.
- 3 We will not do anything to create an advantage for one member or partner, or one group of members or partners to the detriment of other members and partners.
- 4 We will seek to ensure good value and consistent quality, reliability and safety in delivering services. We will not knowingly provide services that are not in the best interests of the recipient of the service.
- 5 Untruths, concealment and overstatements will be avoided in our communications.
- 6 We will provide redress if a service is found to be lacking in quality or lower than the agreed standards.
- 7 Entertainment will be provided to our interlocutors only in the ordinary course of business provided that it is reasonable, modest and proportionate to the occasion, and it will not influence the recipient's objectivity or make the recipient feel obliged.
- 8 We respect the confidence of our stakeholders and seek to protect their interests entrusted to us, or to which the CTO has access including confidential information and intellectual property.
- 9 We strive to meet our contractual obligations and charge honestly for our services.
- 10 We ensure that a detailed report on governance along with audited annual accounts is provided to stakeholders who are entitled to receive such reports in order to inform them of the status of governance of the CTO.
- 11 We will communicate our business policies, achievements and prospects honestly and in a timely manner to all members.

E RELATIONS WITH BUSINESS PARTNERS

- 1 Strengthening the CTO's marketplace, relationships and opportunities depends on our reputation for conducting all aspects of our business with our business partners, including suppliers, contractors and sub-contractors, in a way that is mutually beneficial as well as open.
- 2 Decisions to form a business relationship is made on the basis of objective criteria such as conformity with the mandate of the CTO, quality, reliability, technical excellence, price, delivery, service and maintenance of adequate sources of supply. Business decisions will never be made on the basis of personal relationships and friendships or the opportunity for personal financial gain by individual employees.
- 3 We undertake to pay our suppliers, subcontractors and agents in accordance with agreed terms.
- 4 As the receipt of gifts or substantial favours by employees from business partners could give rise to embarrassing situations and may be seen as improper inducement to give concessions in return to the donor, the following principles will be observed:
 - Gifts and favours must not be solicited.
 - Gifts of money must never be accepted.
 - Reasonable small tokens (below a value of £50/-) and hospitality may be accepted provided they do not place the recipient under any obligation, are not capable of being misconstrued and can be reciprocated at the same level.
 - Any offer of gifts or favours of unusual size or questionable purpose should be reported immediately to the employee's manager and the corporate secretary.
 - Gifts and entertainment that are given or received by CTO staff are recorded in a gift register.
- 5 Where possible, we will favour local suppliers who demonstrate socially and environmentally responsible behaviour and high standards of ethical business conduct.
- 6 Where business partners, subcontractors, agents and other third parties act on our behalf they will be expected to conduct business in accordance with the standards set out in this Code. Wherever possible, the obligation to comply with this Code will be incorporated into relevant contracts.
- 7 Commissions or fees paid to agents and consultants must be reasonable in relation to the services provided. Employees must not agree or pay commissions or fees that could be considered to be improper payments. Agreements with consultants, brokers, sponsors, agents or other intermediaries shall not be used to channel payments to any person or persons, including public officials or customer employees.

F RELATIONS WITH GOVERNMENTS AND LOCAL COMMUNITIES

- 1 We recognise that success in business depends on compliance with legal constraints, sensitivity to local customs and conventions governing business relationships, and a commitment to make a positive contribution to the sustainable development of the communities in which we work.
- 2 We will comply with all laws and regulations wherever we operate. Where they are considered by us to be inadequate or ambiguous, our aim is to set a high ethical standard exceeding the basic requirements of applicable law.
- 3 We will respect the traditions and cultures of each country in which we operate. Where there is conflict between local custom and the principles and values set out in this Code, we will apply either the Code or local requirements, whichever sets the higher standard of behaviour.

- 4 We will take into account the concerns of the wider community including both national and local interests, in all our operations.
- 5 We aim to promote strong relationships with and enhance the capacities of the communities of which we are a part.
- 6 We will respect the authority of the governments in the countries in which we operate. It is therefore imperative that our employees maintain an honest, transparent and ethical relationship with the government, their agencies, officials and personnel. Employees must ensure that when providing organisational information to representatives of the government, that they are accurate, comprehensive and in compliance with applicable laws and regulations.
- 7 We do not directly or indirectly participate in party politics nor make payments to political parties or individual politicians. We elect to represent impartial views to governments and others only on matters relating to our mandate.
- 8 No employee shall make any payment, or kickback, or offer improper financial advantage to an official of a government or a government controlled entity for the purpose of obtaining business or other services.
- 9 We may hire government officials or employees to perform services that have a legitimate business purpose, with the necessary prior approvals. Under no circumstances would a government employee or official be hired to perform services that conflict with that employee's or official's governmental duties or obligations.
- 10 We will not knowingly evade tax obligations.
- 11 We will record and report all transactions, including those where payment is made in cash.
- 12 We will endeavour to make sure that we are not exploited for the purposes of money laundering, drug trafficking or tax evasion.
- 13 We aim for constructive relations with relevant non-governmental and civil society organisations, where their input has the potential to lead to better practices and an increase of our understanding of our host communities.
- 14 We are committed to openness and transparency in communicating with external audiences and seek a constructive relationship with all relevant external stakeholders and the general public.

G ENVIRONMENTAL RESPONSIBILITY

In the context of sustainability, we will prevent, or otherwise minimise, mitigate and remediate any harmful effects of our operations on the natural environment and finite resources, where applicable. We will therefore strive to:

- i. Set out environmental quality standards which are desirable and attainable and comply fully with all relevant environmental legislation.
- ii. Ensure that, our waste management policy not only observes statutory controls and regulations, but sets higher standards where practicable.
- iii. Continually look for ways to reduce the environmental impact of our operations and services.
- iv. Encourage all our staff to conduct their work with regard to best environmental practices and refrain from wasting resources.

H IMPLEMENTING AND MONITORING THIS CODE

- 1 This Code applies to all employees and anyone acting on our behalf. Our commitment to this Code of Ethics is considered fundamental to our success. This will be demonstrated through our systems of training, enforcement and accountability regarding performance as well as our corporate policies and communications.
- 2 Strict adherence to the provisions of this Code is a condition of employment at the CTO. Managers and supervisors must ensure that employees understand this Code and the values that underpin it and are informed of the requirements relating to their job.
- 3 We aim to create a culture in which it is normal for employees both to 'do the right thing' and to voice genuinely held concerns about behaviour or decisions that they perceive to be unethical.
- 4 We will ensure employee protection in cases where conformity with the code jeopardises the reaching of financial or other targets.
- 5 We will implement this code throughout the Organisation by making ethics training part of the basic programme for new employees. Ethical awareness will be maintained by regular training sessions and workshops in which relevant issues will be discussed.
- 6 Retaliation or retribution for reporting concerns will be treated as a violation of the Organisation's ethical principles and will not be tolerated.
- 7 The Corporate Secretary is responsible for initiating and supervising the investigation of all reports of breaches of this Code and ensuring that appropriate disciplinary action is taken when required.
- 8 We will monitor ethical performance regularly and our auditors may be asked to report on any practice they discover in the course of their work which appears to breach this Code.
- 9 No part of this Code may be waived or suspended.
- 10 Members of Management may be required at the end of each financial year to sign an 'Annual Certificate of Compliance' (ACC) stating that they have read the code and have taken all reasonable steps to ensure that they and those reporting to them have conducted business responsibly and in compliance with applicable laws, regulations and the Code.
- 11 We will regularly review and amended this code to ensure that it accurately reflects the demands and affairs of the Organisation and concerns of its employees.