



Ministry of Innovation and Technology

Eastern Africa Regional Digital Integration Project (EARDIP) & Ethiopian Digital Foundation Project (EDFP)

Gender Based Violence(GBV) - Code of Conduct

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Gender Based Violence Code of Conduct for EARDIP & EDFP Project Implementation

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I. Abbreviations & Acronyms

CoC	Code of Conduct
CEDAW	Convention on the Elimination of all forms of Discrimination Against Women
DEVAW	Declaration on the Elimination of Violence Against Women.
EARDIP	Eastern Africa Regional Digital Integration Project
EDFP	Ethiopian Digital Foundation Project
ESCP	Environment & Social Commiteement Plan
GBV	Gender Based Violence
GRM	Grievance Redress Mechanism
GRMC	Grievance Redress Mechanism Committee
M & E	Monitoring & Evaluation
MoJ	Ministry of Justice
MOWSA	Ministry of Women & Social Affairs
NGO	Non Governmental Organizations
PIU	Project Implementation Unit
SEA	Sexual Exploitation & Abuse
SH	Sexual Harassment
UN	United Nations
UNICEF	United Nations International Children's Emergency Fund

II. Definition of Key Terms

To ensure clarity and consistency in implementing the GBV Code of Conduct, the following key terms are defined:

Term	Definition
Code of Conduct (CoC)	A set of rules and behavioral standards that outline acceptable conduct and explicitly prohibit all forms of Gender-Based Violence (GBV), including Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH), within the context of project implementation.
Confidentiality	The obligation to protect all information related to GBV/SEA/SH cases from unauthorized disclosure. This includes safeguarding the identity of survivors, witnesses, and anyone involved in the case, and sharing information only with authorized persons on a need-to-know basis, in accordance with applicable laws and the project's reporting and referral procedures.
Consent	An informed, voluntary, and mutual agreement to engage in an activity. Consent cannot be obtained through coercion, manipulation, threats, or when a person is incapacitated or underage.
Consultant	Firms or individuals contracted to provide technical expertise, advisory services, studies, training, or supervision in support of project planning, design, or implementation.
Contractor	An entity or individual awarded a contract to perform specific project tasks or services, often hiring staff or subcontractors to carry out the work.
Firm	A legal entity or organization responsible for managing its staff and subcontractors, ensuring compliance with project policies, including the GBV Code of Conduct.
Gender-Based Violence (GBV)	Any harmful act perpetrated against a person based on their gender. It includes physical, sexual, emotional, psychological, and economic abuse, as well as harmful practices like child marriage and female genital mutilation.
Grievance Redress Mechanism (GRM)	The process established by a project to receive and address complaints.
Perpetrator	An individual, group, or institution that directly or indirectly commits or supports acts of GBV.
Project Site	All physical and virtual spaces associated with the project, such as offices, construction or field sites, training venues, stakeholder meetings, and digital communication platforms.

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Project Staff	Individuals employed or engaged by contractors or subcontractors, including professional, skilled, and unskilled personnel, who directly or indirectly contribute to the implementation of project activities.
Safeguarding	Measures taken to protect individuals from harm, abuse, and exploitation, particularly in project and workplace environments.
Sexual Abuse	Any actual or threatened physical intrusion of a sexual nature, including acts perpetrated by force or under unequal power dynamics.
Sexual Exploitation	Any actual or attempted abuse of a position of vulnerability, power, or trust for sexual purposes, including profiting monetarily, socially, or politically from the sexual exploitation of another.
Sexual Harassment	Any unwelcome or inappropriate behaviour, advances, or remarks of a sexual nature (verbal, non-verbal, or physical) that create a hostile, intimidating, or offensive environment for the victim. It can occur in various settings, including workplaces, schools, public spaces, or online, and can affect individuals of any gender.
Sub-contractor	Entities or individuals contracted by the main contractor to perform specific tasks or services within a project, including the provision of labour, materials, or expertise, under the supervision and responsibility of the main contractor.
Survivor	An individual who has experienced or been subjected to GBV, including sexual exploitation, abuse, or harassment, regardless of whether they report the incident or seek support services.
Survivor-Centered Approach	An approach that prioritizes the rights, dignity, safety, and well-being of survivors throughout GBV prevention and response interventions.

PART ONE:

1. Introduction

The **Ethiopian Digital Foundations Project (EDFP)** and the **Eastern Africa Regional Digital Integration Project (EARDIP)** are trans-formative initiatives aimed at strengthening digital infrastructure, enhancing regional connectivity, and promoting inclusive socioeconomic development across the region.

These two trans-formative initiatives aim to strengthen digital infrastructure, enhance regional connectivity, and promote inclusive socioeconomic development across Ethiopia and the Eastern African region. In doing so, they recognize that the effectiveness, sustainability, and ethical standing of development projects depend on creating safe, respectful, and inclusive environments for everyone involved—especially women and other vulnerable groups.

Gender-Based Violence encompasses harmful acts directed at individuals based on gender, including **sexual harassment, exploitation, and abuse**. Such acts are not only grave violations of human rights but also pose significant risks to the effectiveness, sustainability, and ethical standing of development efforts. To uphold the highest standards of integrity and accountability, the EDFP and EARDIP projects mandate that all project staff, contractors, sub-contractors & consultants adhere to the CoC.

A core element of this commitment is the implementation of a **comprehensive Code of Conduct (CoC)**, which is enforced for contractors, consultants, and their workers, and actively promoted through engagement with implementing partners and beneficiary institutions, who are encouraged to support and participate in its application.

The CoC clearly outlines **acceptable behaviors, strictly prohibits all forms of GBV—including sexual harassment, exploitation, and abuse , the disciplinary measures for violating the CoC**, and confidential procedures for reporting, redress, and survivor support. It functions as a practical framework for **identifying, mitigating, and responding to GBV risks** throughout the entire project life-cycle, in both workplace and community contexts.

Furthermore, the CoC ensures compliance with the **safeguard policies** of the financing institution—particularly those related to GBV—and aligns with relevant **international and national legal frameworks**. Its enforcement is supported through continuous capacity building, targeted awareness-raising, and the integration of GBV risk mitigation strategies into all phases of project planning and implementation.

This Code of Conduct (CoC) is binding for all contractors, subcontractors, Project staffs involved in the project, all of whom are required to fully comply with its principles and obligations. While not directly bound by the CoC, implementing agencies and beneficiary institutions play a vital supportive role in promoting its implementation and fostering accountability. Beneficiaries and survivors also contribute meaningfully to the prevention, timely reporting, and response to Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH). Through coordinated efforts and shared responsibility, the project seeks to cultivate a culture of respect, safety, and zero tolerance for GBV—ensuring inclusive participation and protection for all, particularly those most at risk

1.1. Purpose of the Code of Conduct

The purpose of this Code of Conduct (CoC) is to establish clear, consistent, and actionable principles that define the roles, responsibilities, and expected behaviour of firms, contractors, subcontractors, and project staff involved in the projects. It also sets the repercussions of violations of the code of conduct and reinforces accountability among all those directly engaged in project activities. The CoC serves as a practical guide to ensure that all actions are carried out in an ethical, socially responsible, and legally compliant manner throughout the project life-cycle.

A central focus of the CoC is the promotion of **gender equality** and the **prevention of Gender-Based Violence (GBV)**. It aims to foster a safe, inclusive, and equitable environment for all individuals engaged in or impacted by the projects. The CoC incorporates specific measures to advance gender equality, prevent all forms of GBV, and ensure that both women and men have equal access to and benefit from the opportunities created by the projects.

1.2. Scope of the Code of Conduct

The scope of this Code of Conduct (CoC) outlines the individuals and environments to which it applies, ensuring comprehensive coverage of all actors and contexts involved in the implementation of the EDFP and EARDIP projects.

1.2.1. Technical Scope

The CoC applies to the following groups, includes:

All firms, individuals, and entities contracted to deliver services, execute project activities, or support implementation in any capacity along with their employees and any sub-contracted personnel.

1.2.2. Geographical Coverage

The CoC applies across all operational settings where project activities are conducted, specifically includes all physical and virtual spaces associated with the project, such as **offices, construction or field sites, training venues, stakeholder meetings, and digital communication platforms.**

1.3. Core Principles

All stakeholders involved in the implementation of the **Ethiopian Digital Foundations Project (EDFP)** and the **Eastern Africa Regional Digital Integration Project (EARDIP)** are expected to uphold the following core “**Gender Equality and GBV Prevention**” Principles:

- **Ensure Equal Opportunities:** Guarantee equal access and opportunities for men, women, from all sectors of society irrespective of social, ethnic, religious, and other differences across all phases of the projects—from planning to implementation and beyond.
- **Apply Gender-Sensitive Approaches:** Integrate gender considerations into the planning, design, construction, and execution of all project components to address the distinct needs and priorities of all genders.

- **Prevent and Address GBV:** Proactively identify, prevent, and respond to all forms of Gender-Based Violence (GBV), including physical, emotional, and sexual abuse, harassment, and exploitation.
- **Build Capacity and Awareness:** Ensure that all stakeholders—including staff, contractors/subcontractor/ project staffs ,partners, and beneficiaries/ communities/ receive adequate training to recognize, prevent, and respond to GBV and gender-related risks throughout the project life-cycle.

PART TWO:

2. GBV/SEA/SH Code of Conduct

This Code of Conduct establishes the required standards of behavior to prevent and respond to **Gender-Based Violence (GBV)**, **Sexual Exploitation and Abuse (SEA)**, and **Sexual Harassment (SH)** in all project activities. It sets clear expectations and prohibits any behavior that undermines dignity, safety, and equality. Violations of this Code will result in appropriate disciplinary actions, including but not limited to **suspension, termination of contract, or legal action**, depending on the severity of the offense.

2.1. Expected Standards of Conduct

In line with our commitment to maintaining a safe, inclusive, and respectful work environment, all project staff, including firms, contractors, subcontractors, and their personnel, must observe the following standards:

2.1.1. Respectful and Professional Behavior

- Treat all individuals with respect, dignity, and fairness, regardless of gender, age, ethnicity, religion, disability, or background.
- Maintain professional conduct at all times; avoid discriminatory, demeaning, offensive, or inappropriate behavior.
- Refrain from forming intimate or sexual relationships where there is a power imbalance, including relationships with beneficiaries or those dependent on project services.

2.2. Prohibited Behaviors: Zero Tolerance for GBV/SEA/SH

The following actions are strictly prohibited under this Code of Conduct:

- **Sexual Harassment:**
Engaging in unwelcome sexual advances or behavior—verbal, non-verbal, or physical—that creates an intimidating, hostile, or offensive environment.
- **Sexual Exploitation:**
Offering or requesting sexual favors in exchange for project-related benefits, such as employment, promotion, access to services, or training opportunities.
- **Sexual Abuse:**
Any non-consensual or coercive sexual act or attempt, including acts involving threats, manipulation, deception, or force.
- **Physical or Psychological Abuse:**
Acts of violence, intimidation, bullying, humiliation, or any other conduct that causes physical or emotional harm.

- **Relationships Involving Abuse of Power:**

Engaging in any relationship—sexual or otherwise—that exploits a power imbalance, particularly with project beneficiaries.

2.3. Reporting Misconduct and GBV Incidents:

All project personnel are expected to take the following actions to ensure accountability and uphold the Code of Conduct:

- Promptly report any suspected or observed violations of this Code, including GBV-related incidents.
- Cooperate fully with investigations while ensuring confidentiality and protection of survivors.

2.4. Protection Against Retaliation:

All individuals are entitled to report concerns without fear of reprisal. The following measures are upheld to ensure protection and trust in the reporting process:

- Retaliation against individuals who report misconduct or use grievance mechanisms is strictly prohibited.
- Foster a safe, supportive environment for reporting concerns.

2.5. Safeguarding Vulnerable Populations:

The firm, contractors, sub-contractors & project staff are responsible for upholding the highest standards of care and protection for at-risk groups: This includes;

- Take proactive measures to protect women, children, and other vulnerable groups from harm and exploitation.
- Ensuring all project activities are conducted in a manner that **safeguards their safety, dignity, and rights.**

PART-THREE:

3. Roles & Responsibilities:

Effective prevention and response to Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH) within the **Ethiopian Digital Foundation Project (EDFP)** and the **Eastern Africa Regional Digital Integration Project (EARDIP)** require the active engagement and accountability of **firms, contractors, subcontractors, and project staff/workers**. They have a critical role to play in ensuring the **implementation of GBV safeguards**, adherence to the **Code of Conduct (CoC)**, and proper functioning of the **Grievance Redress Mechanism (GRM)** across all levels of project delivery.

3.1. Firms (Consulting/Implementing Firms)

- **Sign and comply with the Code of Conduct prior to project implementation.**
- Integrate **GBV/SEA/SH risk mitigation measures** into all phases of project planning and execution.

- **Develop, disseminate, and enforce Codes of Conduct** for all staff and project-affiliated personnel.
- **Provide regular training** on GBV, SEA/SH, and Code of Conduct compliance for employees and partners.
- **Coordinate with the GRMC to support the effective functioning of the Grievance Redress Mechanism (GRM)**, ensure that project staff are aware of and comply with reporting procedures, and facilitate safe and confidential access to the mechanism for survivors and complainants.
- **Report all incidents of GBV, SEA/SH, or other misconduct** promptly to GRMC or the appropriate project authority.
- Ensure that **project beneficiaries and surrounding communities** are oriented on the behavioral standards expected from project personnel and the available grievance and reporting channels.

3.2. Contractors

- **Sign and comply with the Code of Conduct and ensure all staff under their management do the same.**
- Implement **site-specific GBV/SEA/SH risk mitigation measures** as part of daily operations.
- **Ensure all workers under their supervision read, sign, and comply with the Code of Conduct.**
- Ensure that all workers **receive training, understand, and follow expected behavioral standards and** aware of reporting procedures.
- **Promote a workplace culture** that discourages all forms of abuse, discrimination, and harassment.
- Keep records of awareness sessions, complaints received, actions taken, and share relevant updates with the PIU in a confidential and timely manner.

3.3. Sub-Contractors

- **Sign and comply with the Code of Conduct prior to project implementation.**
- Adhere to the same **behavioral standards and obligations** as main contractors.
- **Ensure all workers under their supervision read, sign, and comply with the Code of Conduct.**
- Participate in **mandatory training sessions** on GBV, SEA/SH, and the Code of Conduct.
- **Promptly report any violations** to the main contractor and relevant project oversight or grievance body.
- Promote and maintain a **safe, respectful, and inclusive work environment** at all sites of operation.

3.4. Project Staff / Workers

- **Sign and comply** with the Code of Conduct.
- Participate in **mandatory training** on GBV, SEA/SH, CoC, and GRM.
- **Maintain respectful behaviour** towards coworkers and community members.
- Report any witnessed or experienced **misconduct through the proper GRM channels**.
- **Protect confidentiality** of survivors and support a survivor-centered approach.
- **Cooperate in awareness-raising efforts** within the project context.

PART-FOUR:

4. GBV/SEA/SH Reporting, Complaint Handling Mechanism

A clear, safe, and confidential reporting and complaint-handling system is essential to prevent and respond to Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH). The following mechanism outlines how complaints are reported and handled at the project site, with clear roles for both the **Grievance Redress Mechanism Committee (GRMC)** and **Contractors**:

4.1. Reporting Channels Available to Survivors and Witnesses

Survivors, witnesses, or concerned individuals can report GBV/SEA/SH incidents through the following accessible and confidential channels:

- Directly to the **GBV Focal Person** at the beneficiary institution.
- Through the **Contractor's designated GBV Focal Person** or supervisor.
- Via the **GRMC** (in person, suggestion box, phone, written complaint).
- Through **email, or other digital platforms** (if available).

4.2. Contractor Responsibilities in Reporting and Response

- Establish and maintain a safe, confidential, and accessible internal system for project staff and beneficiaries **to report CoC violations**.
- Assign a GBV Focal Person.
- **Receive and document complaints confidentially** from their staff or community members.
- Promptly **report any GBV/SEA/SH incidents** to the PIU or project grievance mechanism, **not exceeding 24 hrs**.
- **Cooperate fully with the GRMC** during **investigations**, providing necessary information and support while respecting confidentiality.
- **Immediately share reports** with the GRMC or site-level GBV Focal Person, while respecting the survivor's informed consent.
- **Ensure all staff are trained and aware** of the reporting process and their rights and responsibilities.

- **Take immediate protective and disciplinary action** when violations are identified.
- **Support survivor access to services**, including health, psycho-social, legal, and protection support.

4.3. GRMC Roles in Complaint Handling and Oversight

The project established Grievance Redress Mechanism Committees (GRMCs) at federal, regional, and wereda levels. The federal GRMC, set up by the PIU, had six members (including a GBV focal person) with 30–50% women’s representation. Regional & Wereda GRMCs had four members from each beneficiary/implementing entity and stakeholders, also including GBV focal persons, with 30–50% women. All GRMCs handle SEA/SH cases and were reachable through designated contacts in every project location.

The Grievance Redress Mechanism Committee (GRMC) is responsible for:

- **Coordinating with contractors** to ensure that any reports they receive are promptly and confidentially handled.
- **Receiving, documenting, and verifying complaints** from all sources, including direct and contractor channels.
- **Ensuring confidentiality and a survivor-centered approach** at every stage of the process.
- **Manage & direct survivors to appropriate services in line with the** established referral pathway.
- **Monitoring follow-up actions** taken by contractors and recommending additional disciplinary or legal measures if necessary
- **Maintaining secure and anonymous records** of all complaints and actions taken.

PART FIVE:

Disciplinary Actions

Contractors take timely disciplinary measures against staff found responsible for violations in accordance with the project’s CoC and legal requirements. The potential disciplinary measures for Gender-Based Violence (GBV) incidents vary depending on the context, jurisdiction, and severity of the incident. These measures aim to hold perpetrators accountable, support survivors, and prevent further incidents. Below are **the potential disciplinary measures** should be taken in the project & sub-project implementation areas includes.

5.1. Low-Level Violations : Warning or Reprimand

In cases of **misconduct that does not involve physical harm, coercion, or repeated behaviors**, and is often **correctable through administrative measures**, including but not limited to:

- **Verbal harassment or inappropriate language or gestures.**
- **Unwelcome compliments** or suggestive remarks.
- **Ignoring complaints or failing to report minor incidents of sexual harassment**

A **formal written warning or reprimand** may be issued, particularly when it is a **first-time offense** or a **less severe form** of GBV/SEA/SH, in line with the project's disciplinary procedures.

5.2. High-Level Violations

High-level violations refer to **severe, abusive, or criminal acts** that involve **coercion, physical or psychological harm, exploitation, or abuse of power**.

5.2.1. Suspension or Probation

These acts typically have a serious impact on the survivor, the workplace environment, and the integrity of the project. Such violation includes, but not limited to:

- **Repeated, unwanted touching or sexual advances.**
- **Threats to a person's job, safety, or well-being in a sexual context**

The individual may be **placed on suspension or probation**, either **pending further investigation** or while **corrective or disciplinary actions** are being implemented, in accordance with the project's procedures and applicable labour laws.

5.2.2. Termination of Employment or Contract

In cases involving the **most serious forms of Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA), or Sexual Harassment (SH)**—including but not limited to:

- **Physical or sexual assault**, including attempted or actual rape.
- **Sexual exploitation**, such as demanding or accepting sex in exchange for employment, services, or other benefits.
- **Retaliation against complainants**, including threats, intimidation, or punishment of survivors or whistle blowers
- **The immediate termination of employment or contract** shall be applied as a disciplinary measure for confirmed violations, in accordance with the project's disciplinary procedures, the contractor's contractual obligations, and applicable labour laws.

5.3. Consistency and Proportionality:

- Responses to cases will be fair, consistent, and tailored to the severity, impact, and history of offenses, ensuring proportionality in all actions taken.

PART SIX

6. Revision & Transparency of the Document

6.1. Periodic Review: Regularly reviewing and updating this COC to ensure its effectiveness and relevance.

6.2. Transparency: Making this COC widely available to all stakeholders.

References

1. Convention on the Elimination of Discrimination Against Women (CEDAW)

2. CARE – Ethical Principles for GBV Programming
3. Declaration on the Elimination of Violence Against Women (DEVAW)
4. Environmental and Social Commitment Plan (ESCP) for EARDIP
5. Ethiopian Women’s Empowerment and Gender Equality Policy (2010):
6. GBV Guidelines – Integrating GBV Interventions in Humanitarian Action
7. Gender-Based Violence Area of Responsibility (GBV AoR), (MOWSA in Collaboration with UNICEF),
8. International Labour Organization (ILO) –Violence & Harassment Convention, 2019 (No. 190).
9. National Policy and Strategy on GBV Prevention and Response, Ministry of Justice (MoJ), with support from UN Women and UNICEF
10. School-related Gender-Based Violence Code of Conduct. Ministry of Education with the Ethiopian penal code with support of UNICEF, 2014.
11. WB Group “Gender strategy” (FY 16-23)
12. WB safeguard policies & Procedures

ANNEXES:

GBV Code of Conduct – Individual and Firm Signing Templates & Contact Addresses

Gender Based Violence Code of Conduct for EARDIP & EDFP Project Implementation

This annex section contains all the necessary templates and contact information to support the implementation of the Gender-Based Violence (GBV) Code of Conduct in the project. It includes:

1. **Individual Code of Conduct Signing Template** – to be signed by every employee, consultant, and subcontractor, workers engaged by the firm.
2. **Firm Code of Conduct Signing Template** – signed by the authorized representative of the contracting firm.
3. **Contact Addresses for Reporting GBV/SEA/SH Incidents** – a list of designated focal persons to receive and handle GBV-related reports in accordance with the project's GBV Action Plan and national referral pathways.

ANNEX 1:

Individual Code of Conduct Signing Template

Applicable to Contractors, Subcontractors, Consultants, and Personnel Engaged in Project Activities

1. Purpose

This Individual GBV Code of Conduct (CoC) is designed to uphold the highest standards of ethical and professional behavior by all personnel engaged in project activities. It reflects the project's commitment to preventing and responding to all forms of GBV, including Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH), thereby ensuring a safe, respectful, and inclusive environment for staff, community members, and stakeholders.

2. Commitment

As an individual engaged in this project, I will ;

1. **Respect the rights and dignity of all people** regardless of gender, age, disability, ethnicity, religion, or any other status.
2. **Prevent and never engage in** any form of GBV, SEA, or SH, whether at the worksite, during work-related activities, or in the community.
3. **Uphold a culture of zero tolerance** for GBV through my actions, language, and interactions.

3. Prohibited Conduct

I understand that the following behaviors are strictly prohibited:

- **Any language or behavior towards women, children or men** that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
- **Engaging in sexual harassment of work personnel and staff** —for instance, making unwelcome sexual advances, requests for sexual favors, and other physical, verbal, gesture, or digital communication of a sexual nature is prohibited.
- **Engaging in sexual favors** —for instance, making promises of favorable treatment (e.g. promotion), threats of unfavorable treatment (e.g. loss of job or opportunity) or payments in kind or in cash, dependent on sexual acts—or other forms of humiliating, degrading or exploitative behavior.
- **Engaging in sexual relationships with community members** where a power imbalance exists, even if seemingly consensual.
- **Engaging in any sexual activity with a person under the age of 18**, regardless of perceived or claimed consent or permitted by social norm.

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- Any act of **intimidation, retaliation, or threats** against individuals who report or are suspected to have reported GBV incidents.

4. Responsibilities

I will:

- Attend and actively participate in all **GBV/SEA/SH prevention and response training** required by the project.
- **Report any suspected or actual incidents of GBV** by a fellow worker or any breaches of this CoC immediately through established project reporting channels or to the designated focal person.
- **Support survivors** in accessing **appropriate services**, respecting **confidentiality** at all times.
- **Cooperate** fully with **investigations and disciplinary procedures** when required.
- Follow the **site-specific GBV Referral Pathway**, to ensure survivors receive timely and appropriate services.

5. Consequences for Misconduct

I understand that:

- Any act of GBV is a serious violation of this Code of Conduct.
- Such acts will not be tolerated and shall result in appropriate actions in line with the project's disciplinary procedures.

• 6. Acknowledgement

By signing this Code of Conduct, I confirm that I have read, understood, and agree to abide by its terms throughout my engagement with the project.

Name: _____

Position/Role: _____

Organization: _____

Signature & Date : _____

ANNEX 2:

Firm GBV-Code of Conduct Signing Template

1. Purpose

This Code of Conduct (CoC) outlines the commitments and responsibilities of the Firm to prevent, mitigate, and respond to Gender-Based Violence (GBV), including Sexual Exploitation and Abuse (SEA) and Sexual Harassment (SH), in accordance with:

- **World Bank Environmental and Social Framework (ESF)**, including ESS1, ESS2, and ESS4
- **World Bank Good Practice Note on Addressing GBV in Investment Project Financing**
- **National laws** and relevant sector regulations

2. Scope of Application

This CoC applies to:

- The contracting **Firm** (the legal entity)
- **Contractors, Subcontractors, consultants & project staffs** engaged in the project
- All **locations, project sites, and work-related settings** (on-site, training sites, in transit, or online)

3. Firm's Commitments

The Firm shall:

1. **Sign and comply with the Code of Conduct prior to project implementation and ensure all staff under their management do the same.**
2. **Adopt a Zero-Tolerance Policy** towards GBV, SEA, and SH.
3. **Disseminate, and enforce Codes of Conduct** for all staff and project-affiliated personnel.
4. **Integrate GBV requirements into contractual documents** with all subcontractors, suppliers, and consultants.
5. **Conduct mandatory GBV/SEA/SH training** for all workers before engagement in project activities.
6. **Cooperate fully with the Project Implementing Unit (PIU), the World Bank, and relevant authorities in the investigation of GBV cases.**
7. **Monitor and report** on GBV prevention and response measures in regular progress reports to the PIU.

4. Prohibited Conduct

In line with the project & WB requirements, the following acts ,but not limited to, are strictly prohibited:

- **Discrimination** based on age, gender, disability, ethnicity or other status.
- Any form of **sexual exploitation, abuse, or harassment** in the **work place,& community interactions**.
- Sexual activity with anyone **under the age of 18**, regardless of perceived or claimed consent or permitted by social norm .
- Any sexual interaction involving a **power imbalance** between a **firm representative** (including employees, subcontractors, or consultants) and **community members, beneficiaries, or project stakeholders** where one party holds influence, authority, or control over the other.
- **Offering or soliciting sex in exchange** for jobs, promotions, goods, services, or any other benefits.

- **Using sexual, discriminatory, or harassing language, or behavior such as,** Words, jokes, gestures, or physical actions that are sexual in nature or demean another person based on their gender or identity in any work-related context.
- **Retaliation against or intimidating** anyone who, in good faith, reports or participates in the investigation of a GBV- related incident.

5. Reporting and Response Procedures

- GBV incidents shall be reported immediately to the designated GBV Focal Person within the Firm, beneficiary and implementing institutions, or to the project GRM, in line with confidentiality protocols.
- Reports shall be handled confidentially, and survivors shall be referred promptly to appropriate GBV support services.
- All GBV cases shall be documented and reported to the PIU in accordance with the project GBV Action Plan.

6. Monitoring and Enforcement

- The Firm will **appoint and train a GBV Focal Person** responsible for compliance oversight.
- GBV compliance will be subject to **periodic monitoring** by the PIU and the World Bank.

7. Firm Declaration

We, the undersigned, commit to implementing this GBV Code of Conduct in all aspects of our operations and to ensuring that all project staff, contractors & subcontractors comply with its provisions. We acknowledge that compliance with this Code is a binding obligation under the terms of our contract. We further acknowledge that any breach of this Code may result in appropriate disciplinary or contractual actions, in line with the World Bank Standard Procurement Documents and applicable national labor laws.

Firm Name: _____
Authorized Representative: _____
Title: _____
Signature: _____
Date: _____

ANNEX 3 :

Contact Information for Reporting GBV/SEA/SH Incidents

Purpose:

This contact list is provided to facilitate timely, confidential, and survivor-centered reporting of Gender-Based Violence (GBV), Sexual Exploitation and Abuse (SEA), and Sexual Harassment (SH) incidents related to the project. All focal persons listed below are designated representatives from the Project Implementation Unit (including the Gender Specialist), implementing partners, and beneficiary institutions' gender departments. They are trained and authorized to receive, manage, and respond to reports in accordance with the project's GBV Action Plan and the national referral pathways.

Confidentiality:

All reports will be treated with strict confidentiality. Information will only be shared with relevant parties on a "need-to-know" basis to protect the survivor's safety and privacy.

List of Focal Persons

S. N	Focal Person Name	Organization	Telephone No.	E-mail
1	Munit Mekuria	Project Implementaion Unit (PIU)	0911487566	munitm@projects.gov.et
2	Elsabet Gebreselase	Ministry of Innovation & Technology	0923808672	elsabethkal@gmail.com
3	Hiwot Teshome	Ministry of Education (ETHERNET)	0911174992	Hiwot.teshome@ethernet.edu.et
4	Misrak Mohammed	Refugge & Returnes Service (RRS)	91 147 9952	misrakm@rrs.gov.et
5	Meskerem Abebaw	Ethiopian Communication Authority (ECA)	0911783788	meskeremabebaw@eca.gov.et