

# Code of Conduct



**SCEHS**  
Spiritan Centre for Empowerment and Humanitarian Support, Makurdi



**SPIRITAN CENTRE FOR EMPOWERMENT AND  
HUMANITARIAN SUPPORT (SCEHS), MAKURDI**



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**DECEMBER 2025**

# CODE OF CONDUCT

## SPIRITAN CENTRE FOR EMPOWERMENT AND HUMANITARIAN SUPPORT (SCEHS), MAKURDI



DECEMBER 2025

# Principles for integrity

## The underlying ethics for achieving our goals

Status: Approved by the Governing Council

Chairperson - Fr. Samuel Terwase **UDOGBO**, C.S.Sp  
Sign and Seal:



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## 1 Introduction

The purpose of our Code of Conduct is to express the commitment of Spiritan Centre for Empowerment and Humanitarian Support (SCEHS), Makurdi to the highest level of integrity. The activities of the organization are strongly interlinked with our society, in particular the poor, as we seek to empower people to care for themselves. As a structure with purpose, we value transparency, being distinct and being proud for positive impact.

Our Code of Conduct was established by members of the Governing Council in collaboration with the Board of Trustees. The scope of our Code of Conduct is derived from a reflection of Spiritan values, along with a benchmark of local and international ethical perspectives.

Employees of SCEHS are expected to conduct relationships with each other, the organization and external partners according to these values. The Board of Trustees and Governing Council Members agree to the fulfilment of our Code of Conduct and will enforce consequences if any violation of it becomes evident. Our Code of Conduct is therefore the point of reference for SCEHS to work in an ethical manner and with integrity.

The following guidelines support the organisation in achieving its long-term goals in an ethical manner and provide a solid framework for addressing any ethical violations. These guidelines will be regularly reviewed and adapted according to best practices and the ongoing learning and experience of the organization.

## 1.1 Mission

The organization has a clearly stated mission and purpose:

- 1.1.1** To mobilize people to take action that benefits their lives through empowerment and humanitarian support.
- 1.1.2** We expect all who work for or on behalf of the organization to understand that mission and purpose.
- 1.1.3** The safeguarding of children is integral to the execution of our activities; children will always be treated with respect, regardless of their gender, ethnic or social origin, language, religious or other beliefs, disability, sexual orientation or other status.

## 1.2 Applicability

This Code of Conduct applies to:

- 1.2.1** Members of SCEHS
- 1.2.2** Members of the Governing Council (GC), committee members, and Employees of SCEHS and SCEHS partner organizations
- 1.2.3** Interns, other contracted personnel and business partners (e.g. consultants)
- 1.2.4** Volunteers and visitors of SCEHS
- 1.2.5** The Code of Conduct applies to all activities and functions executed on behalf of SCEHS.
- 1.2.6** As part of the onboarding process, employees and

members of the GC are familiar with our Code of Conduct. By signing the Code of Conduct as part of their contract, they confirm that they acknowledge and will follow the Code of Conduct. For employees and all those to whom our Code of Conduct applies, the Code of Conduct shall be used as a guideline to raise critical questions when taking decisions that might have ethical implications. It is encouraged to think before acting and to seek guidance when unsure.

## 1.3 Reporting Mechanism

All those to whom our Code of Conduct applies are required to closely reflect and align their activities accordingly. If questions occur or irregularities are observed, members of staff should report issues in any of the following ways:

- 1.3.1** Anonymous report through post or through the whistle blowing method
- 1.3.2** Contact the person responsible for ethics and compliance
- 1.3.3** Contact any member of the GC that you are comfortable to talk to.

## 2 Code of Conduct

### 2.1 Working with Integrity

- 2.1.1** We adhere to the general legal principles of Nigerian law and, where applicable, local laws
- 2.1.2** We act professionally, honestly, openly and with integrity.
- 2.1.3** We consider sustainable development by taking a balanced account of social, ecological and economic interests.

- 2.1.4** We do not exploit our position/function for any private purposes or personal advantages.
- 2.1.5** We do not accept bribes and decline any undue benefits that are offered.
- 2.1.6** We do not bribe, nor do we incite others to bribe, and we do not grant any undue advantages to officials, companies or other persons.
- 2.1.7** We reject any act of violence or harassment of any nature.
- 2.1.8** We work inclusively and do not tolerate any form of discrimination.
- 2.1.9** We avoid and declare conflicts of interest by adhering to the Conflicts of Interest Policy.
- 2.1.10** We follow the Grant-Making Policy in the service of applicants and grantees.
- 2.1.11** We have a learning culture and are committed to learning from failure.
- 2.1.12** We proactively seek feedback across hierarchies and learn from it.

## **2.2 Governance**

The organization has a GC that is responsible for setting the mission and strategic direction, and that provides an oversight of the finances, operations and policies of SCEHS. The GC ensures that:

- 2.2.1** Its members have the requisite skills and experience to carry out their duties and fulfil their governance duties, acting for the benefit of the organization and its purpose;
- 2.2.2** The Executive Director and relevant staff provide the GC

with timely and comprehensive information so that it can effectively carry out its duties;

- 2.2.3** The organization conducts all transactions and dealings with integrity and honesty;
- 2.2.4** The organization promotes working relationships with Board members, staff and grantees that are based on mutual respect, fairness, trust and openness;
- 2.2.5** The organization is fair and inclusive in its hiring and promotion of policies and practices for all GC members and staff positions;
- 2.2.6** Policies of the organization are set down in writing, clearly articulated and officially adopted;
- 2.2.7** The organization has the capacity to carry out its programs effectively.

## **2.3 Working with Children**

All those covered by our Code of Conduct commit to respecting, promoting, upholding and protecting the rights of children always, as set out in the UN Convention on the Rights of the Child (see: <https://www.unicef.org/media/56661/file>), the Paris Declaration on Aid Effectiveness as well as the Child Protection (see: [https://www.oecd.org/content/dam/oecd/en/publications/reports/2009/02/aid-effectiveness\\_g1gha834/9789264050877-en.pdf](https://www.oecd.org/content/dam/oecd/en/publications/reports/2009/02/aid-effectiveness_g1gha834/9789264050877-en.pdf)), as may be reviewed from time to time and the Policy of SCEHS.

## **2.4 Working with Partners**

- 2.4.1** We take our Code of Conduct as the basis for cooperation and relations with both legal entities and natural persons and partners. We guarantee this basic position by inserting the following integrity clause in contractual agreements:

**a) Anti-Corruption: The Contractual Partner and its staff and associates declare and guarantee that no offer, gift or payment, consideration or benefit of any kind, which constitutes an illegal or corrupt practice, has been or will be made to anyone by the Contractual Partner either directly or indirectly, as an inducement or reward for the award or execution of this agreement**

The Contractual Partner declares and guarantees that neither Contractual Partner, nor staff or partners or associates, temporary nor permanent, who would be involved in the implementation of this contract:

- i) Have been convicted during a period of three (3) years prior to the submission of their proposals for this project, by a court of law in Nigeria or in any other jurisdiction for an offence involving bribery or corruption
- ii) Are under sanction, for an offence involving bribery or corruption, imposed by a government, a governmental organization or a development organization providing development assistance

**b) Anti-Terrorism: The Contractual Partner declares and guarantees that the funds provided by SCEHS for the service shall not knowingly be used to benefit terrorist groups as defined in the Penal Laws of Nigeria or individual members of those groups or for terrorist activities either directly or indirectly.**

**c) Anti-Terrorism, Anti-Bribery and Sanctions: The Contractual Partner represents and warrants that it has not provided within the previous 10 years, and will not provide, material support or resources to any individual or entity that commits, attempts to commit, advocates, facilitates or participates in terrorist activities, which term includes:**

- i. any act prohibited pursuant to any of the United Nations Conventions and Protocols relating to terrorism; or
- ii. an act of premeditated, politically motivated violence perpetrated against non-combatant targets by sub national groups or clandestine agents; or
- iii. any other act intended to cause death or serious bodily injury to a civilian or any other person not taking an active part in hostilities in a situation of armed conflict, when the purpose of such act, by its nature or context, is to intimidate a population, or to compel a government or an international organisation to do or abstain from doing any act.

Breach of this clause shall be deemed a material breach of this Agreement by the Contractual Partner and such breach shall be deemed incapable of remedy.

d) The contractual partner undertakes, within the framework of this contractual relationship (i.e. with regard to the services and benefits defined in this agreement), to respect the SCEHS Code of Conduct and to take all necessary measures to avoid any misconduct. Our Code of Conduct is deemed to form an integral part of the contract; any negligent or willful breach thereof may lead to early termination of the contract on serious grounds.

e) We only work with partners who are aligned with SCEHS's values and interests, and who confirm that, in their activities with SCEHS and in the entire service provision process, they adhere to the corresponding applicable legal provisions.

## **2.5 Origin and Use of Financial Resources**

- 2.5.1** We reduce the risk of unintentional involvement in unethical practices by following a due diligence procedure before involvement with external parties.
- 2.5.2** We utilise financial means exclusively for the humanitarian objectives of the Organization
- 2.5.3** We effect transactions in accordance with the Signatory Authority Policy and the corresponding dual-control principle.
- 2.5.4** We verify all transactions in accordance with correct, comprehensive and lawful bookkeeping.
- 2.5.5** Accepting money with an illegal origin or its concealment is prohibited.
- 2.5.6** We ensure that all payments and financial contributions are not used as a pretext for corruption.
- 2.5.7** We aspire to all assets of SCEHS being invested ethically.

## **2.6 Reporting and Investigation**

- 2.6.1** All parties to which our Code of Conduct is applicable are obliged to report concerns, suspicions, allegations and incidents that indicate actual or potential breaches of our Code of Conduct.
- 2.6.2** SCEHS is committed to responding appropriately and effectively to all allegations and suspicions of abuse, through complaint mechanisms that are simple, clear, fair and accessible to all stakeholders, including children. The Executive Team as well as the GC are committed to this task with high priority.



**2.6.3** All those subject to complaints will be treated fairly and in line with the principles of natural justice (i.e. rule against bias and the right to a fair hearing). Investigations will be objective and transparent and will be guided by external professional expertise and support when required. To the extent reasonable, SCEHS will strive to maintain confidentiality to protect the affected individual(s), subject to its goal of engaging in a thorough investigation. SCEHS may, however, be required to disclose the allegations or result of the investigation to the authorities.

## **2.7 Sanctions**

SCEHS will monitor the implementation of our Code of Conduct. It reserves the right to terminate its collaboration with the accused party immediately if no satisfactory action is taken or if not enough information is provided in the event of a suspicious incident. If necessary, legal action shall be taken.

## **3 Reviews and amendments**

Our Code of Conduct must be reviewed regularly and amended if necessary. Resolutions about the amendment of this code may be passed at any time.