

## Code of Conduct and Code of Ethics Doorways gGmbH

### Purpose

The purpose of this Code of Conduct and Code of Ethics (“Code”) is to ensure that all activities performed by Doorways uphold the highest standards of integrity, moral conduct, ethics, respect, professionalism, and accountability. With these principles, Doorways is aligning all its actions and behavior to international standards for organizations operating across borders.

The following conduct is based on the *United Nations Global Compact*. The criteria regarding ethics are aligned with the key principles for transparency, accountability, and ethical behavior established by the *Global Standard for Civil Society Organizations Accountability*.

Doorways promotes entrepreneurship by developing, implementing, and evaluating interventions and training programs that foster entrepreneurial thinking and behavior to individuals and communities in solidarity with others, respecting the dignity of every person and caring for the most vulnerable and marginalized. Doorways establishes standards, practices, procedures, and responsibility to promote the protection of vulnerable individuals from abuse and exploitation.

### Scope

All members of Doorways have the responsibility to uphold this “Code”. While it does not address every situation specifically, the “Code” provides the guidance needed to conduct the work ethically, with integrity, and in a manner that is consistent with Doorways’ values. Doorways’ reputation and future success rests in each one of its members doing its part to promote ethics, integrity, and respect when serving others and in decision-making. Doorways will monitor and update the “Code” and related documents as necessary.

## Code of Conduct

### 1. Professionalism, Safety and Wellbeing

All members of Doorways are expected to act professionally, maintaining the highest level of competence, reliability, and punctuality in their work.

It is essential to provide adequate care or supervision and/or provide a safe environment for project participants, as any negligence can compromise the well-being and trust of those that the organization serves.

Doorways encourages the use of social media in ways that ensure the safety, privacy, and human dignity of all people.

### 2. Non-discrimination

The success of Doorways is directly related to the trust and credibility that is established by ensuring a work environment free from unlawful discrimination. Doorways is committed to equal employment opportunities and to the development of talent and learning of a workforce with diverse skills and experiences.

No discrimination will be tolerated under any circumstances. Specifically, discrimination based on ethnicity, color, religion, national origin, sex, age, sexual orientation, disability, pregnancy or parental status, marital status, genetic information, political affiliation or any other characteristic protected by law is prohibited. This prohibition covers all terms, privileges, and conditions of employment including, without limitation, recruitment, hiring, assignment, compensation, promotion, discipline, and termination.

### 3. Protection from Harassment and Abuse

Doorways is committed to providing a work environment that is free from harassment, thereby promoting the dignity and equality of the human person. Harassment interferes with an individual's wellbeing, work performance, and dignity and will not be tolerated. Harassment includes verbal, physical, visual, electronic, or other forms of intimidation, hostility, or offensive conduct.

It is prohibited to engage in any form of sexual misconduct, abuse or exploitation, including (but not limited to):

- Touching anyone in a sexual or inappropriate manner.
- Making inappropriate or sexual comments.
- Taking or sharing pornographic pictures.
- Improperly using your position and power in a relationship with any person.
- Any other verbal or physical behavior with a sexual connotation.
- Exchanging money, employment, goods or services for sex—including sexual favors. This includes purchasing sex and exchange of assistance that is due to project participants.
- Engaging in trafficking of people, including withholding identity documents of domestic workers or daily laborers.

- Causing emotional harm to project participants—such as threats, humiliation or discrimination.
- Using corporal punishment or causing any other physical harm to project participants.

#### **4. Child Protection**

If working with or around children, all members of Doorways must ensure that children are treated with care and respect and are protected from harm.

It is prohibited to:

- Have sexual relations with a child (anyone under 18 years of age) regardless of the local age of consent; mistaken belief regarding the age of a child is not a defense.
- Employ children under 15 years of age for any type of full-time work.
- Spend excessive or unnecessary time alone with a child project participant or a child of an adult project participant.

#### **5. Respect for Laws and Regulations**

All members of Doorways must comply with the applicable laws and regulations of the countries in which they work, including human rights standards.

#### **6. Appropriate Use of Resources**

Resources provided by the organization (e.g., funds, equipment, materials) must be used responsibly and solely for the intended purposes, ensuring there is no misuse or misappropriation.

The use of the organization's resources for personal gain is prohibited.

#### **7. Procurement of goods and services**

Procurement contracts or agreements shall be used as legal instruments to purchase goods or services. They establish legally enforceable promises, offered and accepted by the parties, supported by the exchange of things of value (e.g., goods, services, money). Procurement contracts can be formal or in the form of an (accepted) offer and subsequent invoice.

Doorways regards suppliers as partners, and as such, it is important to maintain an atmosphere of honesty and integrity in working with them. The selection of suppliers shall be ethical, based exclusively on quality, service, price, and suitability for Doorways' needs. Members directly responsible for purchasing shall not have any personal or family interest, involvement, or financial relationship with a supplier that might impair objectivity or freedom of judgment. Ethical sourcing of suppliers shall be maintained in compliance with the guidelines established in this "Code".

Consultants and independent contractors working for Doorways are not members and so their terms of service are outlined in a consultancy agreement.

## **8. Confidentiality**

All members of Doorways must respect the confidentiality of personal information shared by beneficiaries/participants, partners, or stakeholders and ensure that such information is not disclosed without proper authorization.

No one can share information or sensitive participant data with third parties without consent.

All are required to safeguard Doorways' confidential, proprietary, and/or sensitive material and information that they have access to.

Doorways is committed to protecting employee privacy. To this end, Doorways maintains employment files securely and confidentially. All members of Doorways have a right to review their employment files with a formal request. When required by law, and in compliance with applicable regulations, third parties or government agencies may also be permitted to view the employment files. Doorways maintains the integrity of its members' payroll information.

## Code of Ethics

### **1. Respect for Human Rights and Cultures**

Doorways values the dignity, diversity, and rights of all individuals, regardless of nationality, race, ethnicity, gender, sexual orientation, religion, or disability.

Doorways commits to understanding and respecting local cultures, customs, and social norms in all operations.

Doorways actively listens to and incorporates feedback from the communities it serves, considering their perspectives in the decisions and actions.

### **2. Commitment to Inclusivity and Gender Equality**

Doorways fosters an inclusive environment that welcomes and values people from all backgrounds, experiences, and identities.

Doorways prioritizes the rights of marginalized groups, with particular emphasis on upholding LGBTQ+ and women's rights in all activities.

Doorways actively combats discrimination and promotes the creation of opportunities for underrepresented communities.

### **3. Transparent and Honest Practices**

Doorways maintains transparency and financial accountability in the operations, sharing accurate, timely, and accessible information about the projects, impacts, and use of resources.

Potential conflicts of interest are disclosed promptly, and decisions are made in the best interests of the organization and the communities it serves.

### **4. Responsible Leadership and Safeguarding**

Doorways leads inclusively and creates safe spaces for addressing concerns and complaints without fear of retaliation.

Doorways upholds guidelines that prevent exploitation, harassment, and abuse, particularly prioritizing the well-being of vulnerable groups such as children.

### **5. Sustainable and Environmentally Conscious Action**

Doorways integrates environmentally sustainable practices into its projects, minimizing the ecological footprint.

Doorways promotes a sustainable implementation of its projects to ensure long-term positive impacts for communities and ecosystems.

## **6. Community-Driven and Responsive Work**

Doorways analyzes any unintended negative effects and takes corrective action when needed to strengthen outcomes.

Doorways' work focuses on empowering individuals and communities with the information, resources, and capacity to drive positive change.

## **7. Integrity in Partnerships**

Doorways builds partnerships rooted in mutual respect and a common vision for sustainable development.

Doorways rejects corruption, bribery, or unethical influence in any form, ensuring all collaborations uphold ethical labor practices.

Doorways shares knowledge transparently to achieve shared goals.

## **8. Empowerment and Diversity in Teams**

Doorways supports the professional growth of the team members and volunteers by providing opportunities for skill enhancement.

Doorways upholds fair, transparent employment practices that value diversity and equity.

## **9. Responsible Use of Artificial Intelligence (AI)**

Doorways recognizes the potential of AI tools to enhance productivity and creativity while maintaining commitment to ethical and evidence-based practices, as well as to meeting quality standards, and avoiding any activities that could compromise its integrity or negatively impact stakeholders.

## **10. Confidentiality and Privacy**

Doorways respects and protects the privacy of all stakeholders, adhering to the German national standards on data protection and confidentiality.

## **11. Accountability and Continuous Improvement**

Doorways holds itself accountable for the outcomes of its work, learning from challenges, feedback from stakeholders and past experiences to improve continuously.

Doorways' focus remains on achieving measurable, sustainable impacts while maintaining ethical and responsible practices.

Doorways publishes an annual report to show Doorways' mission, achievements, and impact over the past year, with highlights of key programs, financial transparency, and donor recognition.

## Reporting Mechanisms

- You are obligated to *immediately* report concerns or suspicions that a member of Doorways is engaging in any conduct that goes against the principles listed above. These concerns or suspicions may be a result of witnessing the incident, being told about such behavior or being the subject of it.
- Doorways takes all reports of possible misconduct seriously. The organization will investigate and take appropriate action. External auditors or legal bodies may be involved if required.
- All investigations should be impartial, thorough, timely, and confidential.
- Anonymous complaints or allegations may also be submitted and will be given due consideration.
- There will be no retaliation against any person who, in good faith, reports a concern about any suspicious activity. Such retaliation would constitute a violation of this Code and Conduct and Code of Ethics.
- When you report:
  - You do not have to know if your concerns or suspicions are true or have all the facts.
  - You do not need to understand everything you have seen, heard or suspected.
  - You do not need to identify a witness or provide evidence to support your concerns.

You can **report concerns** through any of the following channels:

- To report directly, please email [safeguarding@doorways-training.org](mailto:safeguarding@doorways-training.org) or call +49 4134 9099726.
- To report anonymously, please use the form available on the Doorways website <https://www.doorways-training.org/reporting>

## Declaration

All members of Doorways are obligated to act with integrity and are responsible for adhering to the standards of this “Code”.

- I have read, understood, and agree to comply with the above Code of Conduct and Code of Ethics, as well as all applicable laws, regulations, and other requirements.
- I also understand that a breach of the “Code” or failure to report concerns can lead to the termination or suspension of the contract I have with Doorways. Additionally, it may lead to legal actions, including dismissal and possible referral to the judicial authorities.