



Seed Code of Conduct



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Working at SeeD is a unique and profoundly rewarding experience, fundamentally different from a typical research consultancy. As a team dedicated to peacebuilding, we are driven by a set of core values that not only define our approach but also distinguish our mission in the world.

Our commitment to peacebuilding is rooted in the unwavering support for Human Rights, a belief in the power of Equality and Universality, and a steadfast adherence to Solidarity. These principles are not mere guidelines; they are the bedrock of our day-to-day operations and long-term objectives. We recognize the importance of Anti-racism and Anti-oppression, understanding that these are critical elements in creating a more peaceful world.

As an organization, we take a proactive stance in Supporting human rights and advocating for minorities, the marginalized, and the impoverished. Our work transcends mere research; it's a contribution towards a more equitable and just society.

We firmly believe in Anti-warfare and Anti-violence philosophies. In a world often torn by conflict and strife, we strive to be a beacon of hope and resolution. Neutrality and Balance are not just principles; they are our operational standards. We turn to evidence and universal principles for guidance, consciously steering away from political convictions that might skew the purity of our mission.

Our Code of Conduct (CoC) reminds every staff member at SeeD of the inherent risks in our line of work. We are cognizant that our efforts, while aimed at promoting peace, might be misinterpreted, or misused for less than noble purposes. This awareness calls for an unwavering commitment to maintaining our neutrality and ensuring that our actions and findings are not exploited for negative ends.

Central to our ethos is the "Do No Harm" principle, an uncompromising commitment that guides every project, every research initiative, and every collaboration we undertake. It is a reminder that our goal is not just to build peace, but to sustain it in the most ethical and effective way possible.

Working with us means joining a team that isn't just conducting research; it means being part of a global movement towards peace, a journey filled with challenges but also immeasurable rewards in knowing that every step we take is a step towards a more peaceful world.

1. Conflict of Interest and Disclosure Policies

1.1 Conflict of Interest

SeeD Consultants can provide and charge for their professional services to other organizations (clients) if this takes place outside of the time dedicated for their collaboration with SeeD.



Consultants, regardless of their Level of Engagement, are expected to use their professional judgement and exercise integrity to avoid conflicts of interest (COI) with regards to their contractual obligations to Seed. Consultants are expected to disclose other work being conducted with any organization which is deemed to be a competitor for Seed's signature services: calculating indexes which measure social change, resilience, conflict, and peace. In this case consultants agree to resolve potential conflicts of interest and if necessary, sign a non-disclosure agreement with Seed. If the COI cannot be resolved the consultant may be requested to make a choice between a contract with Seed or the alternative organization.

1.2 Confidentiality

Unless explicitly authorized in writing by the Seed Leadership Coordination Team, the Consultant shall not communicate with any person, government, or other entity external to Seed any unpublished information made known to the Consultant by reason of his or her association with Seed. The Consultant shall draw the attention of his or her staff to the confidentiality obligation resulting from the above. If Seed authorizes the Consultant in writing to supply information to a third party on this Contract, the Consultant shall provide such information accurately.

The Consultant shall not advertise or publicize his or her association with Seed under this Contract for any purpose which seeks private financial gain, nor shall the name, emblem, or official logo of Seed be used for business or professional purposes or otherwise without the prior written approval of Seed. Any communication relating to the Contract whether to the mass media or in any public form whatsoever (press, radio, television, cinema, Internet, etc.) shall be subject to prior authorization in writing by Seed.

Consultants are not permitted to disclose any proprietary information to any external party, unless provided with written permission to do so by Seed's Leadership Coordination Team or the Head of the Operations Unit. Any confidential information provided to consultants during their work is not to be divulged either during the work agreement period or after its termination. This includes, but is not limited to the following:

- Project proposals and partnership arrangements;
- Project and institution recipient information;
- Financial information;
- Seed credentials and/or login details;
- Data sets;
- Innovation and institutional development plans;
- Research methodologies and innovations;

The above information can be shared only on very specific occasions and with the written approval, or through a Teaming Contract that stipulates it. Any violation of the confidentiality policy is subject to disciplinary action, including possible termination.

The integrity and safety of data are not just priorities; they are sacred trusts. As peacebuilding researchers, we are often privy of highly sensitive information, and with this



access comes a tremendous responsibility:

- **Upholding Anonymity:** Our foremost commitment is to preserve the anonymity of our participants at the individual level. This is non-negotiable. We understand the potential risks that could arise from the disclosure of identities, particularly in conflict or post-conflict zones. Every piece of data is treated with the utmost confidentiality to protect those who have entrusted us with their stories, experiences, and insights.
- **Sensitive Use of Data:** We are acutely aware of the impact our research can have, not just in academic circles, but in the communities we study. It is our ethical obligation to ensure that our data is never used to make insensitive or inflammatory statements about specific groups or regions. We recognize the danger in simplifying complex social phenomena into potentially harmful narratives.

The provisions described above remain valid even after termination of the mandate.

1.3 Procurement of services

SeeD consultants must disclose any financial investment or employment ties or other interest, held directly by the consultant, or by a relative, friend or acquaintance, in the provision of any goods, services, or facilities, which are being considered for purchase or use by SeeD, or which have already been purchased or are in use by SeeD. This relationship test includes any ties to projects under consideration for funding, buyers, grantees and consultants of institutions receiving assistance.

1.4. Relatives

Consultants must disclose if they are a relative or spouse of a SeeD consultant, or if they are a spouse or relative of a candidate applying for a job with our organization.

1.5 Gifts

No consultant shall accept a gift, personal loan, entertainment or other special consideration from any individual or business organization doing business with SeeD. Small gifts, with a value of 100 EUR or less, may be accepted for cultural reasons or special occasions. Arrangements are never to be made for unauthorized payments, transfers of any goods or use of services to or by any consultant or other individuals or organizations.

1.6 Professionalism & Standards of Behavior

It is the policy of SeeD to promote the highest level of professionalism in our methods of working. This means that all staff are expected to be diligent and thoughtful in the execution of their assignments. It also means that we will always act in a manner that is transparent, above suspicion, and fair.

All SeeD consultants are required to always display the highest standards of personal and professional conduct. Violation of this policy or other illegal or improper acts or practices by any consultant is strictly prohibited. The following examples of conduct may result in disciplinary action, including possible termination of employment. This list is not exhaustive,



but it is provided to illustrate the types of conduct that are deemed unacceptable by our organization.

- Habitual absenteeism or tardiness;
- Lack of cooperation with management or fellow staff members;
- Willful insubordination to the supervisor or other management;
- Overstaying rest or meal breaks;
- Malicious, dangerous, riotous, disorderly or violent behavior or acts;
- Any act to subvert the proper function of our organization;
- Fraud or dishonesty, which adversely affects our consultants, or the operations or property of any persons or organizations with whom we conduct business;
- Falsification of records or obtaining employment through false representation;
- Verbal and/or physical harassment related to the ethnic, religious or sexual background or preference of other consultants or persons;
- Making harmful degrading or defaming comments about our organization, or its programs, projects or personnel;
- Misuse of our equipment including copiers, computers, vehicles, radios, telephones or other equipment, or use thereof without prior approval;
- Use of alcohol on office premises, illegal drugs or other chemicals that adversely affect job performance;
- Willful or negligent loss, destruction, or theft of any property owned by our organization, its consultants or suppliers;
- A receipt, distribution or exchange of bribes, gifts, gratuities or other favors involving any individual with whom we conduct business;
- Engaging in any illegal acts as defined by the laws and regulations of any local or national jurisdiction in which our organization operates or travels on business.

Staff who fail to abide by this code of professional behavior will be subject to disciplinary measures, which could lead to termination of contract.

2 Protection from Discrimination, Harassment and Exploitation Policy

We are committed to establishing and maintaining a work environment in which all individuals are treated with respect and dignity. Everyone has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits discriminatory practices, including harassment. Therefore, we expect that all relationships among people in our employment will be professional and free of bias, prejudice and harassment. Our organization's management will make every reasonable effort to ensure that all consultants are familiar with these policies and are aware that any complaint regarding the violation of such policies will be investigated and resolved appropriately. Any



consultants who has any questions or concerns about these policies is encouraged to talk with their immediate supervisor(s) or the Head of Operations Unit.

2.1. Equal Employment Opportunity and Protected Categories

It is the policy of our organization to ensure equal employment opportunity without discrimination or harassment based on any of the following “protected categories”: tribal affiliation, race, color, religion, sexual orientation, age, national origin, gender, disability, marital status, or any other characteristic that may be protected by law.

2.2 Non-retaliation

We encourage the reporting of all perceived incidents of discrimination or harassment. It is the policy and responsibility of our management to investigate any such reports. Our organization prohibits retaliation against any individual who reports discrimination or harassment or who participates in an investigation of such reports. All staff are expected to comply with this policy and failure to do so could result in disciplinary action, including termination.

However, false and/or malicious complaints of harassment, discrimination or retaliation as opposed to complaints which, even if erroneous, are made in good faith, may also be the subject of appropriate disciplinary action.

2.3 Exclusion Prohibited

These policies should not, and may not, be used as a basis for excluding or separating individuals of a particular gender, or any other protected category, in business or work-related social activities or discussions. In other words, no one should make the mistake of engaging in discrimination or exclusion to avoid allegations of harassment. Our policies intend to prohibit any disparate treatment based on gender or any other protected category, regarding terms, conditions, and privileges of employment. The prohibitions against harassment, discrimination and retaliation are explicitly intended to complement and further those policies, not to form the basis of an exception to them.

2.4 Definitions

The following definitions are to be used in our organization to identify those acts which may be considered harassment or exploitation. For further information on definitions of sexual harassment, exploitation and abuse, please refer to UN Glossary here.

- Racism

Prejudice, discrimination, or antagonism directed against someone of a different race based on the belief that one's own race is superior. Racism can manifest in individual attitudes and behaviors, as well as institutional policies and practices that perpetuate racial inequity.

- Homophobia/LGBTQ-phobia:

Homophobia is the dislike of or prejudice against homosexual people. LGBTQ-phobia extends this concept to include fear, hatred, or mistrust of anyone whose sexual or gender identity falls within the broader LGBTQ (lesbian, gay, bisexual, transgender,



queer/questioning) spectrum. These phobias can result in discrimination, hostility, and violence against LGBTQ individuals.

- Xenophobia

This is the fear or hatred of strangers or foreigners. It often involves deep-rooted mistrust or hostility toward people who are perceived as outsiders or from different cultures, ethnicities, or nations.

- Harassment

Under this policy, harassment is defined as any verbal or physical conduct that denigrates or shows hostility or aversion toward an individual because of his/her membership or affiliation with a protected category. Affiliation with a protected category includes his/her association with relatives, friends or associates who are members of a protected category. Under this policy harassment involves actions which have the purpose or effect of creating an intimidating, hostile or offensive work environment; unreasonably interfering with an individual's work performance; otherwise adversely affecting an individual's employment opportunities.

Harassing conduct includes, but is not limited to epithets, slurs or negative stereotyping; threatening, intimidating or hostile acts; denigrating jokes; written or graphic material that denigrates or shows hostility or aversion toward an individual or group and that is placed on walls, in vehicles, in electronic systems or elsewhere on the employer's premises, or which is otherwise circulated in the workplace.

- Sexual Harassment

Sexual harassment constitutes discrimination and is expressly forbidden by our organization. Such harassment is defined as unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature. Sexual harassment occurs when, for example: submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

Sexual harassment may include a range of behaviors, subtle and/or direct, and may involve individuals of the same or different gender. Depending on the circumstances, these behaviors may include, but are not limited to: unwanted sexual advances or requests for sexual favors; sexual jokes and innuendo; verbal abuse of a sexual nature; commentary about an individual's body, sexual prowess or sexual deficiencies; unwelcome notes, e-mails, phone calls, messages, or gifts of a sexually suggestive nature; leering, whistling or touching; insulting or obscene comments or gestures; display in the workplace of sexually suggestive objects or pictures; and other physical, verbal or visual conduct of a sexual nature.



2.5 Sexual Abuse and Exploitation

Linked to but differentiated from sexual harassment, “sexual abuse and exploitation¹” refers to any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, threats of physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions, profiting monetarily, socially or politically from the sexual exploitation of another, and includes exchange of payment, including goods and services in return for sexual acts.

2.6 Individuals and Conduct Covered

These policies apply to all job applicants and consultants of our organization, whether related to conduct engaged in by fellow consultants or someone not directly connected to our organization (e.g., an outside vendor, consultant or customer). Conduct prohibited by these policies is unacceptable in the workplace and in any work-related setting outside the workplace, such as during times of transportation, business trips, business meetings and business-related social events.

2.7 Reporting an Incident of Harassment, Discrimination or Retaliation

Our organization encourages reporting of all perceived incidents of discrimination, harassment or retaliation, regardless of the offender's identity or position. Individuals who believe that they have been victims of such conduct or those who have witnessed such misconduct should discuss their concerns with their immediate supervisor(s), and/or SeeD Head of Operations Unit, and/or a member of the Leadership Coordination Team. We recognize that such discussions are sensitive, personal and difficult. Thus, SeeD believes it is victims' own prerogative to choose the appropriate team member they wish to disclose a case of misconduct. Once disclosed, the victim and the team member to whom the case was disclosed are expected to follow either informal or formal complaints procedures to ensure that appropriate actions are taken. As such, while confidentiality would be respected across all levels and procedures, this may not be the case for anonymity if a formal investigation is deemed necessary.

In addition, we encourage, but do not require individuals who believe they have been victims of misconduct promptly advise the offender that his or her behavior is unwelcome and request that it be discontinued. However, we recognize the underreported nature of such unwarranted and/or criminal behavior due to multiple reasons from cultural norms to intimidation, and power relations to confidentiality. Thus, an individual observing the misconduct and/or victim may prefer to pursue the matter through other informal or formal complaint procedures described below or contact integrity@seedsofpeace.eu if they wish to remain anonymous.

¹ See UN Secretary-General's Bulletin on protection from sexual exploitation and abuse (PSEA) (ST/SGB/2003/13)



3. Complaints Procedure

3.1 Complaints - Informal Procedure

If for any reason an individual does not wish to address the offender directly, or if such action does not successfully end the offensive conduct, the individual should notify his/her *immediate supervisor(s) and/or the Head of the Operations Unit*, who may, if the individual so requests, talk to the alleged offender on the individual's behalf.

An individual reporting discrimination, harassment, abuse, exploitation or retaliation should be aware, however, that we may decide that the situation is serious enough that it is necessary to take action to address such conduct beyond an informal discussion. Any such decision to escalate the informal complaints procedure to a formal one will be discussed with the victim prior to taking any further action. The best course of action in any case will depend on many factors that carefully assess the needs of the victim and, therefore, the informal procedure will remain flexible. However, this informal procedure is not a required first step for reporting, and victims and/or individuals who witness misconduct can pursue formal procedures if they wish.

3.2 Complaints - Formal Procedure

As noted above, individuals who believe they have been the victims of misconduct, or who believe they have witnessed such misconduct, should discuss their concerns with their *immediate supervisor(s), the Head of the Operations Unit and/or a member of the Leadership Coordination Team*. All formal misconduct complaints should be discussed at the Leadership Coordination Team level, who will decide on the appropriate course of action in liaison with the victim. Seed encourages the prompt reporting of complaints or concerns so that rapid and constructive action (e.g., investigation, disciplinary action, reparation) can be taken. Therefore, while no fixed reporting period has been established, early reporting and intervention have proven to be the most effective method of preventing and resolving actual or perceived incidents of misconduct.

Seed adopts a zero-tolerance policy and is committed to investigating any reported allegations of discrimination, harassment, abuse, exploitation or retaliation promptly. The investigation may include individual interviews with the parties involved and, where necessary, with individuals who may have observed the alleged conduct or may have another relevant knowledge. Complete documentation of the investigation will be prepared, and copies will be kept in confidential files with access locked only by authorized personnel.

3.3 Complaints – General Handling & Disciplinary Procedure

All formal complaints would be handled at the Leadership Coordination Team level in liaison with the victim, to an extent consistent with adequate investigation and appropriate corrective action. The Leadership Coordination Team should discuss the case within one month of its discovery. Confidentiality will be maintained throughout the investigatory process, which should not exceed 3 months.



Retaliation against an individual for reporting any misconduct or for participating in an investigation of a claim of misconduct is a serious violation of this policy and, like the misconduct itself, will be subject to disciplinary action.

Misconduct constituting harassment or any related retaliation will be dealt with appropriately. Within SeeD's Responsive Action Plan, victims will be put in direct contact with SeeD's Clinical Psychologist and Lecturer of Clinical Psychology at the University of Cyprus, [Dr. Alexandros Lordos](#) who will provide them with referral pathways in their country of residence (e.g. psychological or legal support, etc.) of relevant inter-agency bodies (e.g. PSEA Network, GBV/CP coordination groups) to ensure that the needs of survivors of SEA are met. Further action may also include, for example, training, referral to counseling and/or disciplinary action such as verbal warning, written reprimand, withholding of a promotion or pay increase, reassignment, temporary suspension without payment or termination, as determined to be appropriate under the circumstances.

If a party to a complaint does not agree with the resolution, that party may appeal to the Board of Directors.

4. Disciplinary Policy & Procedures

It is our policy to apply disciplinary action only when required and at a level and manner consistent with the nature and seriousness of the infraction, which would include, but not limited to, internal discussions, investigations and/or arbitration if/when necessary. All staff are expected to conduct their activities and relationships in a manner that will generally avoid the necessity to invoke any of the disciplinary actions outlined below.

4.1 Disciplinary Process

Disciplinary actions may include verbal warnings, written warnings, withholding of annual wage increases, withholding of promotion, reduction to a lower post, and dismissal with or without payment of any compensation in lieu of notice. SeeD reserves the right to apply any of these disciplinary actions or other legal remedies as deemed necessary. A consultant/employee may be dismissed for serious infractions without warning.

A verbal warning should be given for minor violations. A written warning is required for more serious violations, unless the level of seriousness requires more stringent immediate actions, such as immediate suspension or termination.

All disciplinary actions except for verbal warnings are to be recorded in the consultant's/employee's personnel file and given to SeeD's Operations Unit for review and filing.

A consultant/employee has the right to contest any written warning, letter of reprimand, or other personnel disciplinary action within a period of one month from the date of the disciplinary action is issued. To do so, they must submit to SeeD's Operations Unit a written response which will also be placed in his/her personnel file (see 4.12 Grievance Procedure and 4.13 Complaint Resolution below).



4.2 Grievance Procedure

It is our policy that any consultant/employee should have the right to complain about any work situation which they consider to be unfair by using the established Grievance Process below.

4.3 Grievance Process

The consultant/employee must first speak with their supervisor(s) and/or Seed's Head of Operations Unit and if the issue cannot be resolved, he/she may take the issue to the next level of management. If the issue remains unresolved, it should be escalated to Seed's Leadership Coordination Team, who shall make the final decision of what action, if any, should be taken.

4.4 Complaint Resolution

It is our policy to require all our staff team members to make every reasonable effort to resolve any questions, problems, and misunderstandings that have arisen in the workplace at the lowest possible level.

4.5 Complaint Resolution Process

Prior to initiating a formal complaint, the involved parties should meet to resolve the complaint. If this fails, the following steps should take place:

Complaints should be presented in writing, dated and signed by the consultant/employee and submitted to the supervisor(s) and/or Seed's Operations Unit (see below for the recommended order of submission).

A meeting should be arranged by Seed's Operations Unit with all the concerned team members (e.g., complainant, supervisor(s)) to discuss the complaint. All documentation of the facts and other information related to the complaint should be assembled in advance of this meeting by Seed's Head of Operations Unit.

If the complaint is not resolved at this meeting, the complaint should be escalated to the Leadership Coordination Team level.

Consultants/employees must first direct all questions, problems and queries to their direct supervisor(s) and Seed's Head of Operations Unit. However, if the matter is unresolved, or the problem is directly concerning the direct supervisor(s), the issue should be brought to Seed's Leadership Coordination Team. Seed's Leadership Coordination Team is available for questions or concerns involving any staff member's employment or grievances. However, the use of all the above steps is encouraged, before bringing a complaint to the Leadership Coordination Team.

4.6 Witnessing of Illegal, Unsafe or Unethical Practices

Seed is committed to the identification and remedy of any malpractice within the organization. Consultants/employees who suspect any form of malpractice, whether it



should involve a criminal injustice or unsafe or unethical practices, are asked to report their observation immediately to their direct supervisor(s) and Seed's Head of Operations Unit, who will take the necessary steps to address the incident reported by the witness. Consultants/employees will not be penalized for using this procedure in strict accordance with our non-retaliation policy (See 2.2 Non-Retaliation above).

4.7 Apolitical Policy

We are a non-political organization. Therefore, none of our programs, business activities or transactions should be conducted in a manner that would potentially cause our organization to be considered political in any regard.

4.8 Smoking Policy

Our organization does not allow smoking in any company building.

4.9 Alcohol and Drug Policy

The use of alcohol in the workplace or while engaged in business outside of our premises is allowed on specific occasions only (i.e., social gatherings for receptions, special events, business lunches/dinners). The manufacture or sale of alcohol in the workplace or while engaged in business outside of our premises, is strictly always prohibited.

4.10 Drug Policy

The manufacture, distribution, possession, sale, or use of any illegal substance in the workplace or while engaged in business outside of our premises, is strictly always prohibited.

4.11 Personal Use of Organizational Property or Personnel

The personal use of the organization's property or services, or the use of our personnel to perform any personal non-business service, is strictly prohibited without prior written approval. This includes the personal use of items or services such as communication equipment, computers, vehicles, or mail services.

4.12 Communications Systems Policy

This policy is intended for all users of our communications systems in order to avoid any possible misuse of equipment or damage to our integrity and reputation. The use of our communications systems is restricted to official use only, except where prior arrangements have been made to reimburse our organization for any added cost related to personal use.

4.13 Personal Use Procedure

Procedures for reimbursing Seed for the personal use of communications systems may be separately prescribed from time to time. Communications systems include, but are not limited to: radios, phones, cell phones, fax and copy machines, laptops, computers, the



Internet, and express or other mail services. This policy also applies to the use of portable equipment, such as laptops, used away from our premises.

Seed reserves the right to monitor consultant use and to retrieve the contents of communications to ensure proper use. Failure to comply with this policy may result in disciplinary action, including termination of employment. Contents of communications may be used in disciplinary or legal proceedings.

4.14 Information Systems Policy

This policy provides guidance relating to responsible use of our organization's computers and Information Systems. This policy addresses the use of the Internet, e-mail, and all office equipment including but not limited to computers, scanners, printers, projectors and digital cameras.

It is acknowledged that some Seed staff require access to electronic communication services and Information Technology (IT) equipment in the normal course of work. The spirit of this policy emphasizes that the use of these services is made available to primarily support Seed related work and not private use. Failure to follow this policy may result in denial of access to these resources, or other disciplinary action, including immediate dismissal.

5. Whistleblower Protection Clause

5.1 Purpose and Scope

This Whistleblower Protection Clause is designed to encourage and enable employees, volunteers, and other stakeholders of Seed to raise concerns within the organization for investigation and appropriate action. With this clause, Seed commits to ensuring that all parties can express concerns about wrongdoing or malpractice within the organization without fear of retaliation or harassment.

5.2 Reporting Responsibility

Every member of Seed has a responsibility to report in good faith any issues or concerns about potential ethical, legal, or policy violations, including but not limited to corruption, fraud, health and safety risks, and misuse of organization's assets.

5.3. Procedures for Reporting

Seed maintains an open-door policy and suggests that employees share their questions, concerns, suggestions, or complaints with someone who can address them properly. In this case, their supervisor. However, if you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with someone in the Human Resources Department or anyone in management whom you are comfortable approaching.



5.4. No Retaliation

This clause prohibits retaliation against anyone who, in good faith, reports possible violations or participates in an investigation. Any employee, volunteer, or stakeholder of Seed who retaliates against someone who has reported a violation in good faith or who has participated in an investigation into such a violation subject to disciplinary action, up to and including termination of employment or association with the organization.

5.5 Confidentiality

Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation and compliance with all applicable laws.

5.6 Handling of Reported Violations

Seed's management team or an appointed investigative body will acknowledge receipt of the reported violation or suspected violation, ensure the issue is investigated, and decide on the action to be taken. This process shall involve a timely response to the concern raised, fully respecting the confidentiality and anonymity of the whistleblower possible.

5.7 Policy Distribution

This Whistleblower Protection Clause shall be distributed to all employees, volunteers, and stakeholders of Seed and shall be made available in prominent locations and on the organization's SharePoint. New hires shall be provided with a copy of this policy as part of their onboarding materials.

By adhering to this clause, Seed demonstrates its unwavering commitment to high ethical standards and reinforces its dedication to protecting the rights and dignity of every individual in its community.

6. Anti-Bribery Policy

6.1. Purpose

The purpose of this Anti-Bribery Policy is to articulate Seed's unwavering commitment to conducting business in a lawful and ethical manner. This policy provides guidance to ensure compliance with all applicable anti-bribery and corruption laws and regulations in the jurisdictions where we operate.

6.2. Scope

This policy applies to all employees, officers, directors, and third parties acting on behalf of Seed, including employees, consultants, contractors, and partners (collectively referred to as "Associated Persons").



6.3. Policy Statement

Seed prohibits bribery in any form. Bribery is defined as offering, promising, giving, accepting, or soliciting an advantage as an inducement for action which is illegal, unethical, or a breach of trust. This includes, but is not limited to, direct or indirect financial or other advantages offered to or received from public officials, clients, suppliers, or any other persons.

6.4. Gifts and Hospitality

Gifts and hospitality are recognized as legitimate aspects of business. However, they must not be used to influence business decisions improperly. All gifts and hospitality given or received must be reasonable, transparent, and duly recorded.

6.5. Donations and Sponsorships

Seed may make charitable donations and sponsor events. However, such contributions must be legal and ethical under local laws and regulations, must not be used as a scheme for bribery, and must be made transparently and without expectation of anything in return.

6.6 Responsibilities

All Associated Persons are responsible for understanding and complying with this policy. Specific responsibilities include:

Avoiding any activities that might lead to, or suggest, a breach of this policy.

Reporting any bribery or corruption risks or incidents through the channels established by Seed.

6.7. Reporting and Whistleblowing

Seed encourages openness and supports anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. Seed is committed to ensuring no one suffers any detrimental treatment because of refusing to take part in bribery or corruption, or because of reporting a concern.

6.8. Monitoring and Review

The Operations Unit team will monitor the effectiveness of this policy and will review its implementation regularly. Internal control systems and procedures will be subject to regular audits to provide assurance that they are effective in countering bribery and corruption.

6.9. Enforcement

Violations of this policy will result in disciplinary action, which could include dismissal for



gross misconduct. SeeD reserves the right to terminate its contractual relationship with any Associated Persons who breach this policy.

This policy is fully endorsed by the senior management of SeeD and will be reviewed and updated on a regular **basis to ensure its effectiveness and relevance.**