



**CENTRE FOR DEVELOPMENT
— IN SOCIAL JUSTICE —**
A People-Centered Development

CENTRE FOR DEVELOPMENT IN SOCIAL JUSTICE (CDSJ)

Code of Conduct and Ethics Policy



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1. Title

This instrument shall be known as the **CDSJ Code of Conduct and Ethics Policy**.

2. Effective Date

This Policy shall take effect on the date of its formal approval by the competent governance authority of the Centre for Development in Social Justice and shall remain in force until amended, replaced, or repealed in accordance with the CDSJ Policy Framework and other applicable governing instruments.

3. Purpose

The purpose of this Policy is to establish the standards of ethical conduct, professional behaviour, integrity, accountability, and institutional responsibility expected of all persons acting for, with, or on behalf of the Centre for Development in Social Justice. This Policy is intended to:

- a) promote a culture of integrity, dignity, transparency, professionalism, and ethical leadership across the organisation;
- b) provide clear behavioural standards for governance members, staff, consultants, volunteers, interns, associates, partners, and other associated persons;
- c) protect the reputation, credibility, and mission of CDSJ;
- d) prevent misconduct, abuse of power, exploitation, discrimination, harassment, conflicts of interest, fraud, corruption, and other forms of unethical behaviour;
- e) ensure that all persons representing CDSJ act in a manner consistent with the organisation's values and commitments; and
- f) support a safe, inclusive, respectful, rights-based, and accountable institutional culture across all current and future jurisdictions of operation.

4. Legal and Institutional Basis

This Policy is adopted pursuant to the Constitution of the Centre for Development in Social Justice, the CDSJ Policy Framework, the Board Governance and Oversight Charter, and other applicable governance and administrative instruments of the organisation.

This Policy shall be read together with all other relevant CDSJ policies, including those relating to safeguarding, child protection, sexual harassment, conflicts of interest, anti-fraud and corruption, grievance handling, whistleblower protection, human resources, data protection, and staff welfare.

CDSJ is headquartered in Lesotho but intends to expand regionally. Accordingly, this Policy is adopted as an organisation-wide ethical instrument intended to apply across all current and future jurisdictions in which CDSJ lawfully operates, subject to applicable law in each country of operation.

5. Scope and Application

This Policy applies to all persons acting for, on behalf of, or in association with CDSJ, including:

- a) members of CDSJ;
- b) governance members, including members of the AGM, the Global Strategic Advisory Board, the Governing Council, the Executive Committee, and any other formally recognised governance structure;
- c) all employees, whether permanent, temporary, fixed-term, part-time, probationary, or seconded;
- d) consultants, interns, fellows, volunteers, associates, contractors, and other associated personnel;

- e) partners, sub-grantees, consortium members, and service providers where compliance with this Policy is incorporated into a contract, agreement, memorandum, code, grant condition, or other formal arrangement; and
- f) any other person representing CDSJ in meetings, public forums, digital spaces, field activities, research activities, advocacy engagements, fundraising activities, or institutional processes.

This Policy applies in all work-related contexts, whether physical, digital, written, verbal, formal, informal, internal, or external, including travel, fieldwork, events, social media use connected to CDSJ, remote working environments, and interactions with communities, stakeholders, and partners.

6. Policy Statement

CDSJ is committed to maintaining the highest standards of integrity, ethics, accountability, professionalism, dignity, and responsible conduct in all aspects of its governance, operations, programmes, partnerships, and public engagement. All persons to whom this Policy applies are required to conduct themselves in a manner that:

- a) upholds the mission, values, and credibility of CDSJ;
- b) respects the dignity, safety, equality, and rights of others;
- c) protects communities, colleagues, partners, and stakeholders from harm;
- d) avoids actual, potential, or perceived misconduct;
- e) demonstrates honesty, fairness, transparency, and responsible stewardship of power and resources; and
- f) contributes to an organisational culture of trust, learning, inclusion, and accountability.

CDSJ has zero tolerance for serious misconduct, including corruption, exploitation, abuse, harassment, discrimination, retaliation, deliberate dishonesty, and misuse of authority.

7. Guiding Principles

All persons subject to this Policy shall be guided by the following principles:

- 7.1 Integrity:** Act honestly, truthfully, responsibly, and in good faith in all dealings connected to CDSJ.
- 7.2 Respect for Human Dignity:** Treat all persons with dignity, courtesy, fairness, empathy, and respect, regardless of identity, status, role, or background.
- 7.3 Accountability:** Take responsibility for one's conduct, decisions, omissions, and use of institutional authority or resources.
- 7.4 Professionalism:** Perform duties diligently, competently, respectfully, and in a manner consistent with the standards expected of a serious rights-based and development institution.
- 7.5 Inclusion and Non-Discrimination:** Promote equality, diversity, and inclusive participation, and refrain from discriminatory conduct, exclusionary conduct, or conduct rooted in bias or prejudice.
- 7.6 Safeguarding and Do No Harm:** Exercise all duties in a manner that protects others from harm, abuse, exploitation, neglect, intimidation, humiliation, and misuse of power.
- 7.7 Confidentiality and Trust:** Handle sensitive information responsibly and protect confidential, personal, and institutional information from misuse or unauthorised disclosure.
- 7.8 Responsible Use of Power:** Do not misuse position, influence, organisational resources, access, or authority for personal gain or improper advantage.
- 7.9 Stewardship:** Use CDSJ resources, opportunities, relationships, and platforms responsibly, lawfully, and only for legitimate organisational purposes.

7.10 Institutional Loyalty and Ethical Courage: Act in the best interests of CDSJ while also raising concerns, reporting wrongdoing, and resisting unethical practices where necessary.

8. Expected Standards of Conduct

All persons subject to this Policy shall:

- a) act honestly and with integrity in all official and work-related matters;
- b) comply with CDSJ policies, applicable laws, contractual duties, and lawful instructions;
- c) perform assigned responsibilities diligently, competently, and in good faith;
- d) treat colleagues, partners, community members, and stakeholders with courtesy, respect, and professionalism;
- e) avoid conduct that undermines team cohesion, institutional trust, or the dignity of others;
- f) use organisational resources responsibly and only for legitimate purposes;
- g) disclose relevant conflicts of interest promptly and fully;
- h) protect confidential, personal, legal, financial, and organisational information;
- i) avoid misconduct both in direct work settings and in any related context where their conduct may affect CDSJ;
- j) support a safe and inclusive working environment;
- k) cooperate with lawful investigations, audits, reviews, and compliance processes; and
- l) report suspected misconduct, abuse, legal non-compliance, corruption, exploitation, or other institutional wrongdoing through appropriate channels.

9. Prohibited Conduct

Without limiting the general obligations under this Policy, the following conduct is prohibited:

9.1 Fraud, Corruption, and Dishonesty

- a) theft, fraud, embezzlement, bribery, forgery, falsification of records, or misappropriation of funds or assets;
- b) deliberate misrepresentation of facts, qualifications, timesheets, expenses, achievements, or institutional information;
- c) soliciting, receiving, offering, or giving improper benefits in connection with CDSJ work.

9.2 Abuse of Power and Exploitation

- a) misuse of authority, status, influence, or access for personal gain or improper advantage;
- b) coercion, intimidation, manipulation, retaliation, threats, or abuse of power;
- c) exploitative behaviour toward colleagues, community members, beneficiaries, interns, junior staff, or partners.

9.3 Harassment and Sexual Misconduct

- a) sexual harassment, unwanted sexual advances, sexualised comments, suggestive communication, coercive conduct, or abuse of authority for sexual purposes;
- b) bullying, humiliation, verbal abuse, hostile conduct, or repeated degrading treatment;
- c) any behaviour that contributes to an intimidating, offensive, hostile, or unsafe working environment.

9.4 Discrimination and Hate-Based Conduct

- a. discriminatory conduct based on sex, gender, age, disability, health status, religion, nationality, ethnicity, race, class, marital status, sexual orientation, gender identity, political opinion where protected by law, or other protected grounds;
- b. hateful language, derogatory remarks, exclusionary conduct, or conduct rooted in prejudice.

9.5 Safeguarding Violations

- a. any form of abuse, neglect, exploitation, grooming, or harmful conduct involving children or vulnerable persons;
- b. sexual exploitation and abuse;
- c. failure to report safeguarding concerns in accordance with applicable CDSJ policies.

9.6 Retaliation

- a. victimising, threatening, disadvantaging, silencing, or punishing a person for making a complaint, reporting misconduct, seeking advice, participating in an inquiry, or refusing to engage in unethical conduct.

9.7 Misuse of Organisational Assets and Systems

- a. unauthorised use, theft, reckless use, or deliberate damage to organisational funds, equipment, vehicles, systems, intellectual property, or facilities;
- b. misuse of digital systems, passwords, communication tools, records, or confidential information;
- c. using CDSJ property, resources, or branding for unauthorised personal, political, commercial, or unlawful purposes.

9.8 Substance Abuse and Impaired Conduct

- a. reporting for duty or participating in CDSJ work while impaired by alcohol, drugs, or other substances to the extent that safety, judgment, dignity, or performance is compromised;
- b. possessing, distributing, or using unlawful substances in CDSJ premises or in CDSJ-related contexts, except as may be lawfully prescribed and responsibly managed.

9.9 Unauthorised Public Representation

- a. speaking on behalf of CDSJ without proper authority;
- b. making false, misleading, defamatory, reckless, or inappropriate public statements that may damage CDSJ or others;
- c. representing personal political, ideological, or commercial views as official CDSJ positions without authorisation.

10. Confidentiality and Responsible Information Handling

All persons subject to this Policy must protect confidential, sensitive, and personal information acquired through their work or association with CDSJ. This includes information relating to:

- a) staff and governance matters;
- b) finance and procurement;

- c) safeguarding and complaints;
- d) legal, contractual, or strategic matters;
- e) community or survivor information;
- f) research participants and data subjects; and
- g) donor, partner, and institutional records.

Such information may not be disclosed, shared, retained, discussed, or used improperly, whether during or after the person's relationship with CDSJ, except where disclosure is authorised, legally required, ethically justified, or necessary for legitimate institutional purposes.

11. Conflicts of Interest and Improper Advantage

All persons must avoid situations in which personal interests, relationships, financial interests, external commitments, or other private considerations compromise, influence, or appear to influence their judgment or official responsibilities.

Any actual, potential, or perceived conflict of interest must be disclosed promptly in accordance with the applicable CDSJ policy or procedure.

No person may use their association with CDSJ to secure personal benefit, favour relatives or associates improperly, divert opportunities, or influence decisions for non-institutional purposes.

12. Gifts, Hospitality, and Benefits

Persons subject to this Policy shall not solicit gifts, favours, hospitality, payments, discounts, or other benefits connected to their CDSJ role where this may create an actual, potential, or perceived conflict of interest or improper influence. Reasonable and modest gifts or courtesies may only be accepted where:

- a. they are lawful and culturally appropriate;
- b. they do not influence or appear to influence decision-making;
- c. they are not cash or cash equivalents unless specifically authorised; and
- d. they are disclosed where required by internal procedures.

CDSJ may develop further rules on gifts, hospitality, and declarations under related policies or procedures.

13. Relationships in the Workplace and Abuse of Position

All persons must maintain appropriate professional boundaries in their interactions connected to CDSJ. No person may:

- a) abuse authority in personal, intimate, supervisory, mentoring, contractual, financial, or dependency-based relationships;
- b) engage in conduct that compromises fairness in recruitment, supervision, performance management, procurement, grant-making, or other institutional decisions; or
- c) fail to disclose a relationship where such disclosure is necessary to protect institutional fairness, safeguarding, or accountability.

Where intimate, family, household, or close personal relationships create a real or perceived conflict of interest, this must be declared and managed appropriately.

14. Use of Digital Platforms, Communications, and Social Media

Persons subject to this Policy must use digital platforms, communication tools, and social media responsibly where their conduct may affect CDSJ. They shall not:

- a. post, share, or circulate hateful, abusive, discriminatory, defamatory, misleading, or unlawful content linked to CDSJ work or identity;
- b. disclose confidential or sensitive organisational information online;
- c. present unauthorised views as official CDSJ positions; or
- d. use CDSJ systems or branding for improper personal, political, or commercial activity.

Nothing in this Policy prevents lawful personal expression, but all persons must exercise good judgment where their conduct may reasonably affect CDSJ's reputation, safety, legal obligations, or working relationships.

15. Financial Integrity and Responsible Stewardship

All persons with access to funds, budgets, assets, procurement processes, vehicles, equipment, donor resources, or institutional approvals must act with the highest level of honesty, care, prudence, and accountability. They must:

- a. use resources only for authorised purposes;
- b. comply with applicable controls, approvals, procurement rules, and financial procedures;
- c. maintain accurate records; and
- d. immediately disclose suspected misuse, irregularity, loss, fraud, or financial misconduct.

16. Respectful Workplace and Organisational Culture

CDSJ expects all persons to contribute to a workplace culture that is safe, inclusive, collaborative, non-abusive, and professionally respectful. This includes:

- a. listening respectfully to differing views;
- b. avoiding hostile, humiliating, or undermining conduct;
- c. supporting fair participation and teamwork;
- d. respecting institutional diversity; and
- e. exercising power responsibly, especially in leadership roles.

Leadership within CDSJ carries an enhanced duty to model ethical behaviour, fairness, restraint, confidentiality, and accountability.

17. Reporting Obligations

All persons subject to this Policy have a duty to report, through appropriate channels, any reasonable suspicion of:

- a. serious misconduct;
- b. safeguarding concerns;
- c. sexual harassment or abuse;
- d. fraud, bribery, corruption, or theft;
- e. serious discrimination or retaliation;
- f. unlawful conduct affecting CDSJ; or
- g. material breaches of this Policy.

Failure to report serious concerns may itself constitute misconduct, particularly where the person had a duty of care, safeguarding responsibility, leadership role, fiduciary function, or supervisory obligation.



18. Protection of Persons Reporting in Good Faith

No person who raises a concern, makes a complaint, seeks guidance, or participates in an inquiry in good faith shall be subjected to retaliation, victimisation, intimidation, harassment, loss of opportunity, reputational harm, or other adverse treatment for doing so.

CDSJ shall treat retaliation as a serious violation of this Policy.

19. Roles and Responsibilities

19.1 Governance Structures: Governance bodies shall promote ethical leadership, support institutional accountability, and ensure that CDSJ maintains appropriate systems for addressing misconduct and upholding integrity.

19.2 Executive Management and Secretariat: Executive management shall ensure dissemination, implementation, orientation, and enforcement of this Policy, and shall support fair, timely, and confidential management of ethical concerns and allegations of misconduct.

19.3 Managers and Supervisors: Managers and supervisors shall model ethical behaviour, create safe reporting environments, respond appropriately to concerns, and avoid tolerating or normalising misconduct.

19.4 Staff and Associated Personnel: All staff and associated persons shall read, understand, acknowledge, and comply with this Policy and any related policies or procedures.

19.5 Partners and Contractors: Partners and contractors bound by this Policy shall comply with its applicable provisions and cooperate with any legitimate compliance requirements arising from their relationship with CDSJ.

20. Compliance and Enforcement

Compliance with this Policy is mandatory.

Any breach of this Policy may result in one or more of the following, depending on the seriousness of the conduct and the nature of the person's relationship with CDSJ:

- a. advice, counselling, or mandatory corrective action;
- b. written warning or disciplinary action;
- c. withdrawal of duties, authority, privileges, or representation status;
- d. suspension;
- e. termination of employment, contract, fellowship, internship, volunteer placement, or governance role;
- f. recovery of losses or assets;
- g. referral to external authorities where required by law; or
- h. any other lawful and proportionate action.

All enforcement must be fair, documented, proportionate, and consistent with due process and related CDSJ policies.

21. Country Applicability Clause

This Policy is intended to apply across all CDSJ operations and future country offices.

Where mandatory legal requirements in a country of operation require additional or more specific ethical, labour, safeguarding, reporting, or disciplinary provisions, CDSJ may issue a country annex, compliance schedule, or implementing procedure.

Such country-specific instruments shall supplement, and not weaken, the core standards established in this Policy, except where adjustment is required by mandatory law.

22. Related Instruments

This Policy shall be read together with:

- the Constitution of CDSJ;
- the CDSJ Policy Framework;
- the Board Governance and Oversight Charter;
- Conflict of Interest Policy;
- Anti-Fraud, Corruption and Bribery Policy;
- Whistleblower Protection Policy;
- Grievance and Complaints Handling Policy;
- Disciplinary Policy;
- Safeguarding Policy;
- Child Protection Policy;
- Sexual Harassment Policy;
- Human Resources Policy;
- Data Protection, Privacy, and Confidentiality Policy; and
- any other relevant CDSJ policy or procedure.

23. Monitoring, Review, and Amendment

This Policy shall be monitored as part of CDSJ's broader governance, compliance, human resources, safeguarding, and institutional integrity systems. It shall be reviewed at least once every three years, or earlier where required by:

- a. legal or regulatory change;
- b. institutional growth or country expansion;
- c. a serious incident or investigation;
- d. audit or governance recommendation;
- e. policy implementation gaps; or
- f. organisational restructuring.

Amendments to this Policy shall be approved through the appropriate governance process and recorded in the official Policy Register.

24. Definitions

For purposes of this Policy:

Associated Personnel means consultants, volunteers, interns, fellows, contractors, secondees, and any other person engaged to act for or on behalf of CDSJ.



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Conflict of Interest means any situation in which personal, financial, relational, political, or other private interests interfere with, influence, or appear to influence a person's impartial performance of their duties.

Confidential Information means any non-public information obtained through one's relationship with CDSJ, including personal, financial, safeguarding, legal, strategic, governance, research, donor, or operational information.

CDSJ means the Centre for Development in Social Justice.

Governance Member means any person serving in a formally recognised governance role within CDSJ.

Misconduct means behaviour that violates this Policy, other CDSJ policies, lawful instructions, or applicable professional and ethical standards.

Retaliation means any adverse action, threat, intimidation, punishment, or disadvantage imposed on a person for reporting a concern, participating in an inquiry, or refusing to engage in wrongdoing.

Safeguarding Concern means any concern relating to abuse, exploitation, neglect, harassment, harm, or risk of harm involving a child, vulnerable person, community member, staff member, or other person affected by CDSJ work.

25. Approval

Approved by: Adv. Motlatsi J Mofolo

Approving Authority: Director and Boards Ex-Officio

Date of Approval: 10 February 2026

Effective Date: 1st March 2026

Version: 1.0

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