

## SDSN Association

### Code of Conduct and Ethics

October 2021

The SDSN Association was set up in 2014 to host the UN Sustainable Development Solutions Network, which works under the auspices of the UN Secretary-General to support sustainable development. It is an independent 501(c)3 non-profit organization based in New York City.

The SDSN Association is committed to promoting sustainable development as enshrined in the United Nations 2030 Agenda for Sustainable Development: a plan for people, planet and prosperity. The Agenda seeks also to strengthen universal peace in larger freedom. As part of the Agenda, the member states of the United Nations resolve to “free the human race from the tyranny of poverty and to heal and secure our planet.” The Sustainable Development Goals (SDGs) demonstrate the scale and ambition of this new Universal Agenda. They are “integrated and indivisible and balance the three dimensions of sustainable development: the economic, social and environmental”.<sup>1</sup>

The SDSN Association is committed to the values and goals laid out by the United Nations. It is essential that our work and our employees, consultants, interns, volunteers, associates and beneficiaries subscribe to these values in principle and in practice.

This Code of Conduct and Ethics provides guidance on fundamental principles of integrity, accountability, independence, impartiality, respect, and professional commitment that is expected of all associates of the SDSN Association, notwithstanding their contractual or remuneration status. This includes individuals who have a contractual relationship, such as advisors, consultants, etc.; as well as third party entities such as vendors, contractors or technical partners. All commit to ensuring that their behavior is consistent with the values and principles set forth in this document. This policy notes that SDSN has a zero-tolerance policy towards any acts of physical violence and sexual harassment or exploitation. It aims to provide guidance to SDSN staff and external associates to address any such acts and to protect beneficiaries in contexts where SDSN has projects and programs from exploitation and abuse at the hands of SDSN staff and collaborators in order to ensure the integrity of SDSN activities.

It is important to note that this code of conduct applies equally to all groups of people, including women, children and vulnerable adults. SDSN explicitly forbids sexual activity with minors (persons under the age of 18 years), regardless of the local age of consent. All cases of violation of the Code of Conduct and Ethics will be considered serious misconduct, liable for action as described below.

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<sup>1</sup> United Nations 2015. “Transforming Our World: 2030 Agenda for Sustainable Development”. A/RES/70/1. New York. [www.sustainabledevelopment.un.org](http://www.sustainabledevelopment.un.org)

As an external associate of the SDSN Association, I undertake to uphold and promote its values and principles and protect its reputation in all my actions. This undertaking includes, but is not limited to:

- Supporting the Sustainable Development Goals (SDGs) in all professional matters and be conscious of the implications of my work and choices on the environment, social inclusion, and economic development;
- Upholding, demonstrating, and promoting the values of the United Nations, including impartiality in professional settings, fairness, honesty and truthfulness, in daily activities and behaviors. In particular, this includes placing a high value on personal integrity and zero tolerance for malfeasance, corruption, fraud, and nepotism;
- Adhering to the UN Declaration on Human Rights, and respecting SDSN membership of the UN Global Compact, adhering to the 10 Principles of the Global Compact;
- Valuing, pursuing, and promoting scientific knowledge, including evidence-based policy-making with full awareness of scientific uncertainty and knowledge gaps;
- Seeking excellence in work by adhering to the highest professional standards and creating the best possible quality of outputs;
- Treating all colleagues, associates, vendors and all other people with whom the SDSN Association works with respect, dignity, honesty and fairness;
- Committing to creating a work environment where the dignity, safety and comfort of each individual is upheld and which is free from violence, harassment, exploitation, discrimination and intimidation against individuals based on personal beliefs or characteristics including but not limited to nationality, race, class, religion, ethnicity, gender identity, gender expression, sexual orientation, age, political beliefs, marital status or disabilities;
- Maintaining high standards of professional and personal conduct and probity;
- Following all applicable laws, including the laws of my country of residence and in countries that I visit as part of my work duties;
- Respecting societal norms when working in other countries and exercising cultural sensitivity when interacting with people from different cultural backgrounds;
- Ensuring transparent and responsible management of SDSN Association resources, recognizing that all our funding comes from philanthropic or taxpayers' funds that require the highest levels of fiscal prudence, transparency, and accountability;
- Reporting to relevant supervisors any instances where the standards put forward in this Code of Conduct and Ethics are not applied.

I recognize that the SDSN Association does not tolerate any external associate:

- Accepting bribes, or significant personal gifts from governments, beneficiaries, donors, suppliers or others in relation to their work;
- Engaging in behavior that constitutes harassment on the basis of gender identity, gender expression, or other personal beliefs or characteristics, including but not limited to nationality, race, class, religion, ethnicity, gender identity, gender expression, sexual orientation, age, political beliefs, marital status or disabilities;
- Engaging in behavior that constitutes sexual harassment or discrimination (as defined in Annex 1)
- Engaging in behavior that constitutes bullying (as defined in Annex 2)
- Engaging in violent behavior or exploitation of any kind;
- Drinking alcohol or using any other substances in ways that can adversely affect their ability to work or that may affect the reputation of SDSN Association;
- Creating or tolerating personal conflicts of interest in relation to work undertaken with SDSN Association;
- Behaving in ways that may threaten the security of colleagues;
- Violating the conditions of SDSN Association grant agreements or vendor contracts.

I recognize that engaging in any of the behaviors listed above can potentially result in the termination of association with the SDSN Association. In cases of doubt, I shall seek clarity on the applicability of any of the above standards and policies by consulting the President of the SDSN Association or any other person designated for such purposes by the President.

By affixing my signature to this document and initialing the preceding and following pages, I agree to follow the SDSN Association Code of Conduct and Ethics.

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Name:

Date:

Place:

**Annex 1**  
**Safeguarding**

**SDSN Association Anti-Sexual Harassment and Discrimination Policy**

SDSN Association is committed to ensuring a work environment free from violence, harassment, exploitation, and intimidation that enables directors, officers, employees, consultants, contractors, interns, temporary employees, volunteers, and persons conducting business with the SDSN Association to work without fear of discrimination, prejudice, gender bias or sexual harassment. This includes all forms of gender violence, sexual harassment, and discrimination on the basis of sex/gender or other personal characteristics protected under applicable federal, state or local law. SDSN Association is committed to a workplace where the dignity, safety and comfort of each individual is upheld. SDSN Association strongly supports gender equality and opposes any form of gender discrimination and violence. SDSN Association has zero tolerance for sexual harassment, or related retaliation, at the work place or elsewhere involving SDSN Association directors, officers, employees, consultants, contractors, interns, volunteers, or anyone else working with SDSN Association is prohibited and is, therefore, subject to discipline, up to and including termination. In addition to being a violation of this policy, sexual harassment and retaliation are also unlawful under federal, state and local law.

**Objective:**

- To promote a safe, congenial, positive and productive work environment.
- To have zero tolerance for Sexual Harassment as defined below.

**Scope:**

- SDSN Association directors and officers
- SDSN Association employees
- SDSN Association consultants
- SDSN Association contractors
- SDSN Association interns
- SDSN Association volunteers

SDSN Association directors, officers, employees, consultants, contractors, interns and volunteers work with a wide range of individuals outside of the organization. These include members of the SDSN Leadership Council, regional and national SDSN network hosts and managers, staff from the United Nations system, amongst others. It is the expectation of the SDSN Association that such external partners and colleagues will work with SDSN Association directors, officers, employees, consultants, contractors, interns and volunteers as per the guidelines defined in this policy, a copy of which will be shared with those external partners and colleagues with whom SDSN has a significant and long-term relationship.

**Definitions:**

“Sexual Harassment” includes harassment on the basis of sex or gender (including pregnancy, childbirth and related medical conditions), sexual orientation, gender identity or gender expression (including the status of being transgender). Sexual harassment includes unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when:

- 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 a basis for employment decisions affecting them;
- Such conduct has the purpose or effect of unreasonably interfering with an individual’s work performance or creating an intimidating, hostile, or offensive work environment.

Unwelcome behavior does not mean “involuntary.” A victim may consent or agree to certain conduct and actively participate in it even though it is offensive and objectionable. Therefore, sexual conduct is unwelcome whenever the person subjected to it considers it unwelcome.

Sexual Harassment does not need to be sexual in nature. It can also include harassment or abuse because of one’s gender identity, gender expression, or sexual orientation. Sexual Harassment can happen to people of any gender identity, gender expression, or sexual orientation. Usually, Sexual Harassment is a pattern of behavior, but a single incident can be serious enough to be considered harassment as well.

Examples of Sexual Harassment include, but are not limited to the following:

**Verbal:**

Epithets (e.g. referring to an adult as a girl, hunk, doll, babe, or honey)

Derogatory jokes or comments about a person’s body

Sexual innuendos

Turning work discussions to sexual topics, either in person or through calls, texts, emails, or voicemails

Telling sexual anecdotes or stories

Catcalls or whistling at someone

Intrusive questions about sexual life, history, experiences, or preferences

Unwanted sexual advances or invitations

Lewd or threatening letters

Spreading rumors or stories about a person’s sex life

Verbal abuse or comments because of a person's gender identity, gender expression, or sexual orientation

**Non-verbal:**

1. Sexually-oriented posters, photos, videos, cartoons or gestures
2. Sexually suggestive gestures (staring, hand gestures, facial expressions)
3. Blocking a person's path or following a person
4. Giving unwelcome personal gifts

**Physical:**

1. Unwanted and deliberate touching, leaning over, cornering or pinching
2. Standing close to, or brushing up against a person
3. Unwanted hugging, kissing, patting, stroking or massaging another person
4. Touching oneself sexually around another person
5. Actual or attempted coercive sexual relations

**Duty to Report:**

Any supervisor who experiences, witnesses or becomes aware of possible harassment must immediately report the matter to management. All other employees, consultants, or contractors of the SDSN Association who learn of an incident of harassment, are encouraged to report that incident to management even if the victim does not wish to file a formal complaint. Written complaints can be submitted using the form included with this policy.

The SDSN Association will aim to ensure confidentiality and anonymity for employees and contractors that raise such concerns on behalf of others or on behalf of themselves. However, some disclosure may (and likely will) be necessary to effect a meaningful investigation and appropriate remedy. Employees and contractors are expected, and required, to cooperate fully with any investigation of alleged sexual harassment. This includes participating in requested interviews, obtaining and providing requested documents or other evidence, and maintaining the confidentiality of any information requested or provided. Failure to cooperate will be considered a violation of this policy.

**Process to Deal with Complaints of Sexual Harassment**

The President of the SDSN Association will constitute a grievance redressal committee comprising a minimum of two individuals (from amongst the VP, Operations, the Head of the NY Office, a nominated employee holding the position of head of program, and/or one external person) at the start of each financial year. All employees will have the opportunity to review the list of names, which will be finalized on a no-objection basis. In case a member of the grievance redressal committee is accused of sexual harassment, that person will be recused from the committee and replaced by

another nominated member. In case of a formal sexual harassment complaint the composition can be modified if needed to ensure that at least one member is acceptable to the complainant and one member is acceptable to the accused.

Directors, officers, employees, consultants, contractors, interns, and volunteers who have experienced sexual harassment should report the incident as soon as possible after the incident occurs. The following section explains the internal process for handling such complaints within the SDSN Association. The entire process (steps 1 through 5 below) will be completed within no more than 60 working days following the reporting of the incident.

1. As a first step, directors, officers, employees, consultants, contractors, interns and volunteers are free to try to settle the issue informally by discussing it with either their direct supervisor, or another member of the senior management of the SDSN Association. While doing so, they are free to request advice on how to resolve the matter directly with the accused. In this case, the accused may be presented with an overview of their behavior and given an opportunity to stop the behavior, with an offer of an apology to the director, officer, employee, consultant, contractor, intern, or volunteer.
2. Every director, officer, employee, consultant, contractor, intern, or volunteer has the absolute right to bypass the informal process and file a formal complaint directly. Written complaints can be submitted using the form included with this policy. The complaint can be made in confidence to any member of the committee. In case the person who wants to file the complaint is unable to make a formal complaint due to reasons of physical or mental incapacitation or death, their legal heirs or any representative can file a complaint instead.
3. The committee will meet the complainant within 3 working days of the complaint being filed and will listen in detail to the complainant, as well as to the accused to determine the nature of the alleged offence.
4. The committee will set up an investigation process to determine if the complaint constitutes a case of Sexual Harassment. If a case of Sexual Harassment is confirmed, the committee will also determine the severity of the case and recommended next steps. The committee will seek legal advice if needed.
5. The committee findings and proposed next steps will be shared with the President, Executive Director and Chairman of the Board for approval and implementation.

The committee will report back to the President every quarter with an update on implementation of the recommended course(s) of action. The President will update the Board on any such cases and how they were resolved at every Board meeting (typically held twice a year).

Depending on the severity of the act, penalties for being found guilty of Sexual Harassment may include a warning, a change of roles and responsibilities, notes in employee human resource records, mentions on performance reviews, limits to pay revisions, and termination of contract (employment or other).

SDSN directors, officers, employees, consultants, contractors, interns, and volunteers who report incidents or suspected incidents of harassment in good faith, based on reasonable grounds will not face any retaliation, including in the form of cuts to salary, lost opportunities for promotions, reduction of benefits, or re-allocation of projects.

False complaints of Sexual Harassment with malicious intent will be met with strong disciplinary action.

In those cases where the alleged perpetrator is an external partner or colleague as defined above, SDSN Association directors, officers, employees, consultants, contractors, interns and volunteers are expected to report such incidents to their direct supervisors and to the grievance redressal committee who in turn will share it with the Executive Director and President of the SDSN Association. All complaints regarding the behavior of external parties should be made in writing, recording the time and nature of the offence. SDSN Association senior management takes complaints of sexual harassment very seriously and will make every effort to respond to them; and will do so in close consultation with the complainant. Upon receipt of the complaint, the first step will be to ensure the safety and wellbeing of the complainant. This may require a series of responses, including but not limited to direct communication from senior management to the alleged perpetrator; halting contact between the complainant and the alleged perpetrator; reaching out to the HR department or supervisor of the alleged perpetrator; and potentially a change in the relationship between the external partner and SDSN. The exact response will depend on several factors, including the nature of the offence, the pattern of behavior of the external partner, the nature of the relationship between the external partner and SDSN, and will be determined on a case by case basis.

In those cases where SDSN Association receives a complaint of sexual harassment by one of its directors, officers, employees, consultants, contractors, interns or volunteers from an external organization, the SDSN Association grievance redressal committee will receive the complaint and will work closely with that organization to verify the complaint and recommend next steps. SDSN Association is not responsible or liable for any claims of sexual harassment against individual staff. SDSN Association will follow its independent due process to deal with claims of harassment as outlined above.

For the avoidance of doubt, none of the procedures outlined in this document preclude the victim (or a staff member with a duty to report) from pursuing the legal protection and external remedies below.

#### **Legal Protections and External Remedies**

Employees and external partners may choose to pursue external legal remedies with the following governmental entities:

##### State Human Rights Law (HRL)

The Human Rights Law (HRL), codified as N.Y. Executive Law, art. 15, § 290 et seq., applies to all employers in New York State with regard to sexual harassment, and protects employees, paid or unpaid interns and non-employees, regardless of immigration status. A complaint alleging violation of



the Human Rights Law may be filed either with the Division of Human Rights (DHR) or in New York State Supreme Court.

Complaints with DHR may be filed any time within one year of the harassment. If an individual did not file at DHR, they can sue directly in state court under the HRL, within three years of the alleged sexual harassment. An individual may not file with DHR if they have already filed an HRL complaint in state court.

Complaining internally does not extend your time to file with DHR or in court. The one year or three years is counted from date of the most recent incident of harassment.

You do not need an attorney to file a complaint with DHR, and there is no cost to file with DHR.

DHR will investigate your complaint and determine whether there is probable cause to believe that sexual harassment has occurred. Probable cause cases are forwarded to a public hearing before an administrative law judge. If sexual harassment is found after a hearing, DHR has the power to award relief, which varies but may include requiring your employer to take action to stop the harassment, or redress the damage caused, including paying of monetary damages, attorney's fees and civil fines.

DHR's main office contact information is: NYS Division of Human Rights, One Fordham Plaza, Fourth Floor, Bronx, New York 10458. You may call (718) 741-8400 or visit: [www.dhr.ny.gov](http://www.dhr.ny.gov).

Contact DHR at (888) 392-3644 or visit [dhr.ny.gov/complaint](http://dhr.ny.gov/complaint) for more information about filing a complaint. The website has a complaint form that can be downloaded, filled out, notarized and mailed to DHR. The website also contains contact information for DHR's regional offices across New York State.

#### Civil Rights Act of 1964

The United States Equal Employment Opportunity Commission (EEOC) enforces federal anti-discrimination laws, including Title VII of the 1964 federal Civil Rights Act (codified as 42 U.S.C. § 2000e et seq.). An individual can file a complaint with the EEOC anytime within 300 days from the harassment. There is no cost to file a complaint with the EEOC. The EEOC will investigate the complaint and determine whether there is reasonable cause to believe that discrimination has occurred, at which point the EEOC will issue a Right to Sue letter permitting the individual to file a complaint in federal court.

The EEOC does not hold hearings or award relief but may take other action including pursuing cases in federal court on behalf of complaining parties. Federal courts may award remedies if discrimination is found to have occurred. In general, private employers must have at least 15 employees to come within the jurisdiction of the EEOC.

An employee alleging discrimination at work can file a "Charge of Discrimination." The EEOC has district, area, and field offices where complaints can be filed. Contact the EEOC by calling 1-800-669-4000 (TTY: 1-800-669-6820), visiting their website at [www.eeoc.gov](http://www.eeoc.gov) or via email at [info@eeoc.gov](mailto:info@eeoc.gov).

If an individual filed an administrative complaint with DHR, DHR will file the complaint with the EEOC to preserve the right to proceed in federal court.

#### Local Protections

Many localities enforce laws protecting individuals from sexual harassment and discrimination. An individual should contact the county, city or town in which they live to find out if such a law exists. For example, employees who work in New York City may file complaints of sexual harassment with the New York City Commission on Human Rights. Contact their main office at Law Enforcement Bureau of the NYC Commission on Human Rights, 40 Rector Street, 10th Floor, New York, New York; call 311 or (212) 306-7450; or visit [www.nyc.gov/html/cchr/html/home/home.shtml](http://www.nyc.gov/html/cchr/html/home/home.shtml).

#### Contact the Local Police Department

If the harassment involves unwanted physical touching, coerced physical confinement or coerced sex acts, the conduct may constitute a crime. Contact the local police department.

**Complaint Form**

If you believe that you have been subjected to harassment, you are encouraged to complete this form and submit it to Stacey Clark, VP, Operations, 475 Riverside Drive, Suite 530, New York, N.Y. 10115. Email: [stacey.clark@unsdsn.org](mailto:stacey.clark@unsdsn.org), Phone: 212-870-3925.

**COMPLAINANT INFORMATION**

Name:

Work Address:

Work Phone:

Job Title:

Email:

Select Preferred Communication Method:    Email    Phone    In person

**SUPERVISORY INFORMATION**

Immediate Supervisor's Name:

Title:

Work Phone:

Work Address:

**COMPLAINT INFORMATION**

1. Your complaint of Harassment is made about:

Name:

Title:

Work Address:

Work Phone:

Relationship to you: Supervisor Subordinate Co-Worker Other

2. Please describe what happened and how it is affecting you and your work. Please use additional sheets of paper if necessary and attach any relevant documents or evidence.

3. Date(s) harassment occurred:

Is the harassment continuing? Yes No

4. Please list the name and contact information of any witnesses or individuals who may have information related to your complaint:

*The last question is optional but may help the investigation.*

5. Have you previously complained or provided information (verbal or written) about related incidents? If yes, when and to whom did you complain or provide information?

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

**ACKNOWLEDGMENT**

I acknowledge that I have received, read, understand, and will abide by SDSN Association’s Anti-Sexual Harassment policy. I also understand that the policy does not create an employment contract.

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Name:

Date:

Place:

## Safeguarding

### **Workplace Bullying Policy**

#### **Objective**

The purpose of this policy is to communicate to directors, officers, employees, consultants, contractors, interns, and volunteers that SDSN will not *in any instance* tolerate bullying behavior. Employees found in violation of this policy will be disciplined, up to and including termination of contractual relationship and association with SDSN Association.

#### **Definition**

SDSN defines bullying as mistreatment of one or more people by one or more perpetrators. It is abusive conduct that includes:

- Threatening, humiliating or intimidating behaviors.
- Intentional interference that prevents work from getting done.
- Verbal abuse.

Such behavior violates SDSN's Code of Conduct and Ethics.

#### **Examples**

SDSN considers the following types of behavior examples of bullying:

- **Verbal bullying.** Slandering, ridiculing or maligning a person or his or her family; persistent name-calling that is hurtful, insulting or humiliating; using a person as the butt of jokes; abusive and offensive remarks.
- **Cyber bullying.** Using electronic communications to bully a person, typically by sending messages of a mean, hurtful, or intimidating nature. These messages may be signed or anonymous.
- **Physical bullying.** Pushing, shoving, kicking, poking, tripping, assault or threat of physical assault, damage to a person's work area or property.
- **Gesture bullying.** Nonverbal gestures that can convey threatening messages.
- **Exclusion.** Socially or physically excluding or disregarding a person in work-related activities.

In addition, the following examples may constitute or contribute to evidence of bullying in the workplace:

- Persistent singling out of one person.
- Shouting or raising one's voice at an individual in public or in private.
- Using obscene or intimidating gestures.
- Not allowing the person to speak or express themselves (i.e., ignoring or interrupting).
- Personal insults and use of offensive nicknames.
- Public humiliation in any form.

- Constant criticism on matters unrelated or minimally related to the person’s job performance or description.
- Public reprimands.
- Repeatedly accusing someone of errors that cannot be documented.
- Deliberately interfering with mail and other communications.
- Spreading rumors and gossip regarding individuals.
- Encouraging others to disregard a supervisor’s instructions.
- Manipulating the ability of someone to do his or her work (e.g., overloading, underloading, withholding information, setting deadlines that cannot be met, giving deliberately ambiguous instructions).
- Assigning menial tasks not in keeping with the normal responsibilities of the job.
- Taking credit for another person’s ideas.
- Refusing reasonable requests for leave in the absence of work-related reasons not to grant leave.
- Deliberately excluding an individual or isolating them from work-related activities, such as meetings.
- Unwanted physical contact, physical abuse or threats of abuse to an individual or an individual’s property (defacing or marking up property).
- Threats or comments about job security without foundation.

Individuals who feel they have experienced bullying should report this to their supervisor or to the VP, Operations, ideally before the conduct becomes severe or pervasive. All employees and external partners are strongly encouraged to report any bullying conduct they experience or witness as soon as possible to allow SDSN to take appropriate action.

**ACKNOWLEDGMENT**

I acknowledge that I have received, read, understand, and will abide by SDSN Association’s Workplace Bullying Policy. I also understand that the policy does not create an employment contract.

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Name:

Date:

Place: