



## **KURDISTAN ORGANIZATION FOR HUMAN RIGHTS WATCH (KOHHRW)**

### **SUPPLIER CODE OF ETHICS**

Version 01 – 2025

#### **1. Purpose and Commitment**

Kurdistan Organization for Human Rights Watch (KOHHRW) is committed to conducting all procurement and contractual activities with the highest standards of integrity, transparency, and accountability. This Supplier Code of Ethics defines the minimum ethical, social, and environmental standards expected from all suppliers, contractors, consultants, and service providers ('Suppliers') engaged with KOHRW. By signing this declaration, suppliers agree to comply with these standards and applicable laws, including the Iraqi Labour Law No. 37 of 2015, and the core conventions of the International Labour Organization (ILO). KOHRW reserves the right to verify compliance and to take corrective action, including termination of any contract, for non-adherence to this Code.

#### **2. Legal and Ethical Compliance**

Suppliers must comply with all applicable laws, regulations, and tax obligations of Iraq, maintain accurate business licenses, avoid activities violating national or international law (fraud, corruption, money laundering, terrorism financing), and not engage in businesses involving arms, narcotics, or human trafficking. Suppliers must comply with UN and Government of Iraq sanctions and disclose any conflict of interest with KOHRW staff or operations.

#### **3. Integrity, Fair Dealing, and Anti-Corruption**

Suppliers shall uphold the highest standards of integrity and fair business practice: no gifts, bribes, commissions, or improper advantages may be offered to KOHRW staff or affiliates; no collusion, coercion, or price-fixing is permitted; all information must be accurate, honest, and complete; and any attempt to improperly influence the process will result in disqualification or termination.

#### **4. Labour Rights and Working Conditions**

Suppliers must respect and uphold workers' rights in line with Iraqi Labour Law No. 37 (2015) and ILO Core Conventions: no forced or bonded labor; no child labor under 18 in

hazardous work; fair wages meeting or exceeding legal standards; working hours not exceeding 8 hours per day or 48 hours per week; safe and hygienic working conditions; workers' right to association; no discrimination by gender, ethnicity, religion, disability, marital status, or political affiliation; and strict prohibition of physical abuse, harassment, or intimidation.

#### **5. Environmental Responsibility**

Suppliers shall conduct operations responsibly, minimizing waste, pollution, and emissions; using resources efficiently; managing hazardous materials safely; and avoiding practices that harm the environment or local communities.

#### **6. Protection from Sexual Exploitation, Abuse, and Harassment (PSEA)**

KOHRW enforces a zero-tolerance policy for sexual exploitation, abuse, and harassment. Suppliers must prohibit any exchange of money, goods, or services for sexual favors, ensure no staff engage in sexual activity with persons under 18 or aid beneficiaries, report any incidents or suspicions to [procurement@kohrw.org](mailto:procurement@kohrw.org), and take disciplinary measures against staff found responsible for such misconduct.

#### **7. Child Safeguarding and Human Trafficking**

Suppliers must ensure no involvement in child abuse, exploitation, or trafficking. Recruitment must be transparent and free of fees to workers. Provided accommodations must meet minimum health and safety standards. Any violation must be reported to [procurement@kohrw.org](mailto:procurement@kohrw.org) immediately.

#### **8. Confidentiality and Data Protection**

Suppliers must treat all KOHRW information as confidential, using it solely for contractual purposes. Unauthorized disclosure or misuse is prohibited.

#### **9. Transparency, Accountability, and Record-Keeping**

Suppliers must maintain accurate financial records related to KOHRW contracts for at least six years, allow audits and inspections, and cooperate fully with compliance reviews.

#### **10. Reporting and Complaints**

Any supplier or stakeholder may report unethical behavior, suspected fraud, or non-compliance confidentially to [complain@kohrw.org](mailto:complain@kohrw.org). KOHRW reviews all reports confidentially and ensures no retaliation for good-faith reporting.

**11. Conflict of Interest Declaration** – Suppliers must disclose any personal, financial, or family relationships with KOHRW employees or partners.

#### **12. Health, Safety, and Security**

Suppliers are responsible for ensuring the health, safety, and security of their staff and subcontractors while performing any work under KOHRW contracts.

### 13. Acknowledgment and Declaration

By signing this declaration, the supplier confirms that they have read, understood, and agree to comply with this Supplier Code of Ethics, Iraqi Labour Law, and ILO Core Labour Standards. KOHRW may verify compliance and terminate contracts for violations.

#### Supplier Declaration

|                               |  |
|-------------------------------|--|
| Name of Bidder:               |  |
| Authorized Representative:    |  |
| Position:                     |  |
| Date:                         |  |
| Signature:                    |  |
| Company Stamp (if available): |  |

This declaration must be signed and submitted with every quotation or contract agreement.