



Center for Implementation of Investment Projects

CODE OF ETHICS AND CONDUCT

2025

Dushanbe, Republic of Tajikistan

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1. General Provisions

- 1.1 The Code of Ethics and Official Conduct of Employees (hereinafter referred to as the Code) was developed in accordance with the provisions of the Constitution of Tajikistan, the Labor Code of the Republic of Tajikistan, and is aligned with international standards, including the Anti-Corruption and Ethics Guidelines of the Adaptation Fund (AF) and Green Climate Fund (GCF). It is developed by the Center for Implementation of Investment Projects (CIIP) and is grounded in generally accepted ethical principles and norms of Tajik society and state.
- 1.2 The Code is a set of general principles of professional work ethics and basic rules of official conduct that should guide the CIIP's employees, the CIIP's director and the CIIPs deputy director.
- 1.3 All employees are required to comply with the provisions of the Code with compliance being a criterion for evaluating professional performance, labor discipline and ethical behavior.
- 1.4 The Code is approved along with the CIIP's internal labor regulations, and upon approval is brought to the attention of all CIIP employees.

2 Definitions

For the purposes of the Code, the following terms shall have the meaning set out below:

- **Corruption:** Abuse of entrusted power for private gain, including bribery, embezzlement or other improper personal or financial benefit.
- **Fraud:** Any intentional act or omission designed to deceive others, resulting in the victim suffering a loss and/or the perpetrator achieving a gain.
- **Bribery:** Offering, giving, receiving or soliciting anything of value to influence the actions of an individual in an official or professional capacity.
- **Favoritism:** Giving unfair preferential treatment to one person or group at the expense of others.
- **Conflict of Interest:** A conflict of interest occurs when an individual's personal, social, financial or political interests could potentially interfere with their ability to perform their duties impartially or could influence their decisions to the detriment of CIIP's objectives and ethical standards.
- **Whistleblower:** An employee who reports or discloses information about unethical, illegal or corrupt practices within the CIIP.

3 Basic Responsibilities, Principles and Rules of Conduct

3.1 CIIP employees must :

- Perform assigned duties conscientiously in accordance with their labor agreements;
- Comply with internal labor regulations, labor discipline, safety standards and protect CIIP property.
- Promote human rights, respect legal frameworks and avoid illegal or unethical actions.

- Refrain from favoritism, conflicts of interest and undue political, religious or personal influence
- Actively counteract corruption, fraud and abuse of power, and take steps to prevent unethical conduct.

CIIP adopts a zero-tolerance policy for fraud and corruption in all operations and activities. Any confirmed cases will result in immediate disciplinary action, including possible termination and legal measures.

3.2 CIIP employees must refrain from:

- Discriminatory statements or actions based on gender, age, race, nationality, religion or personal status.
- Rudeness, offensive language or actions that disrupt communication or provoke illegal behavior.
- Smoking in the premises of the Center.

4 Anti-Corruption and Fraud Prevention

4.1 Employees must:

- Reject all forms of corruption, bribery and fraudulent behavior.
- Not accept gifts, monetary rewards, services or favors related to the performance of their official duties.
- Notify the director or appropriate authority immediately if approached with corrupt or fraudulent proposals.

4.2 The CIIP director must:

- Lead by example, demonstrating integrity, professionalism and accountability.
- Ensure that employees under her/his supervision understand and comply with anti-corruption standards

4.3 Reporting Mechanisms

- A clear, step-by-step reporting mechanism will be established, ensuring employees can report ethical concerns anonymously.
- Reports can be submitted through a designated reporting channel (such as an anonymous email or hotline) and will be systematically logged and reviewed.
- An Ethics Oversight Committee will be formed to review, investigate, and address complaints of corruption, fraud or unethical behavior.

4.4 Monitoring Compliance

- The Ethics Oversight Committee will regularly monitor compliance with ethical standards and report findings to senior management.
- All employees will undergo mandatory anti-corruption and ethics training to strengthen awareness and capacity for ethical decision-making.

4.5 CIIP's anti-corruption measures are designed to comply with international standards, including the AF's zero-tolerance policy for fraud and corruption. All employees must understand that even minor infractions will be treated with utmost seriousness.

5 Whistleblower Protections

5.1 The CIIP encourages employees to report any suspected unethical, illegal or corrupt behavior.

5.2 Employees who report in good faith will be protected from retaliation, discrimination or disciplinary action. Confidentiality will be maintained to the fullest extent possible.

5.3 Reports can be made directly to the CIIP director, designated Ethics Officer or relevant legal authorities.

5.4 The grievance mechanism will be specifically designed to address complaints related to environmental damage, social harms, gender discrimination and corruption. All complaints will be documented, investigated, and resolved with appropriate follow-up measures. Stakeholders affected by CIIP projects will have access to this grievance mechanism to raise concerns about potential environmental or social impacts.

6 Ethical Conduct Guidelines

6.1 Employees must:

- Uphold respect, tolerance, and fairness in all professional interactions.
- Avoid discrimination based on gender, age, race, nationality, religion or other protected characteristics.
- Maintain a businesslike and professional appearance.
- Treat colleagues, partners, and the public with politeness, respect and courtesy.
- Safeguard confidential information obtained through their work.

6.2 Protection Against Harassment and Discrimination

- The CIIP adopts a zero-tolerance policy toward workplace harassment, including sexual harassment, and all forms of discrimination as further outlined in CIIP's comprehensive Anti-Discrimination and Anti-Harassment Policy.
- An independent complaint resolution process will be established, ensuring strict confidentiality and impartial handling of all harassment and discrimination complaints.
- Mandatory training on workplace ethics, respectful conduct and the prevention of harassment and discrimination will be provided.
- Timely and fair investigation procedures will be developed to ensure a safe and respectful workplace.
- CIIP recognizes the unique vulnerabilities of different groups to climate change impacts and is committed to ensuring gender-responsive approaches in all activities. Project design and implementation will actively promote women's empowerment, equal access to benefits, and gender-balanced participation in decision-making processes, in alignment with the AF's Gender Policy and Action Plan. CIIP will conduct gender analyses for all climate projects to ensure equitable distribution of resources and benefits.

7 Conflict of Interest Management

- 7.1 All employees and decision-makers are required to submit annual Conflict of Interest Disclosure Statements declaring any personal, financial, or other interests that could influence their professional duties.
- 7.2 The Ethics Oversight Committee will review disclosures and assess any potential or actual conflicts.
- 7.3 Employees must immediately notify the Ethics Oversight Committee if a conflict of interest arises during the year.
- 7.4 Individuals must recuse themselves from decision-making processes where a conflict exists.

8 Employee Conduct and Disciplinary Measures

- 8.1 A tiered disciplinary system will be established, including verbal warnings, written warnings, suspensions, and terminations, depending on the severity of the ethical violation.
- 8.2 A confidential reporting channel will be maintained to allow employees to report misconduct safely and anonymously.
- 8.3 Ethics training will be integrated into employee onboarding and offered as annual refresher courses to ensure ongoing awareness of ethical standards.

9 Transparency in Decision-Making

- 9.1 All ethics-related decisions and investigations will be documented to ensure accountability and traceability.
- 9.2 The CIIP will publish an annual ethics and compliance report summarizing key activities, findings, and improvements to promote transparency and build trust among stakeholders.

10 Environmental and Social Safeguards

- 10.1 CIIP is committed to implementing projects that promote positive environmental and social benefits while avoiding, minimizing, or mitigating adverse impacts.
- 10.2 All CIIP projects, especially those funded by the AF, will be screened for environmental and social risks during the design phase and monitored throughout implementation.
- 10.3 CIIP will develop and maintain an Environmental and Social Management System (ESMS) that aligns with the Adaptation Fund's Environmental and Social Policy and its 15 principles.
- 10.4 Project managers must ensure that potential environmental and social impacts are identified and addressed prior to project implementation. This process should involve qualified Environmental and Social Specialists to develop appropriate mitigation measures in compliance with relevant standards and regulations.
- 10.5 Regular environmental and social impact assessments will be conducted for ongoing projects to ensure compliance with established safeguards.

11 Final Provisions

- 11.1 Violations of this Code may result in disciplinary action per CIIP policies and applicable laws.

- 11.2 This Code shall be periodically reviewed to ensure alignment with evolving ethical standards, legal frameworks, and international best practices, including those set by the AF, GCF, and other relevant entities.
- 11.3 In official conduct, employees must prioritize the constitutional principles that uphold individual rights and freedoms, ensuring respect for privacy, dignity, and personal reputation.
- 11.4 Employees are expected to foster constructive and respectful working relationships, uphold a professional appearance, and contribute to a positive organizational culture.