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1. Preamble

The National AIDS Council (NAC) is mandated to provide strategic leadership of Zimbabwe's response to HIV and AIDS by promoting, coordinating, and implementing comprehensive programmes and interventions designed to prevent the spread of the Human Immunodeficiency Virus (HIV) and to mitigate the impact of Acquired Immune Deficiency Syndrome (AIDS). Entrusted with public resources and sensitive information, NAC upholds public trust through integrity, transparency, accountability, and service excellence. This Code of Ethics manual outlines the ethical standards expected from NAC board members, management, employees, community volunteers and implementing partners. Strict adherence to these standards is essential for maintaining the trust, integrity, and effectiveness of NAC.

2. Purpose of the Code

The purpose of this Code is to:

- 2.1. **Promote Organisational Integrity:** Encourage a culture of honesty, transparency and fairness.
- 2.2. **Ensure Legal Compliance:** Adhere to relevant laws, regulations and industry standards.
- 2.3. **Foster Ethical Decision Making:** Guide employees in making responsible choices.
- 2.4. **Build Stakeholders Trust:** Demonstrate commitment to ethical practices and social responsibility.
- 2.5. **Prevent Unethical Behaviour:** Establish clear guidelines and consequences for misconduct.

3. Scope and Applicability

This Code applies to all individuals acting for and on behalf of NAC regardless of contract type or location including;

- Board Members
- Management and Employees

- Volunteers and Interns
- Consultants and Contractors
- Implementing Partners

4. Ethical Values

- 4.1. **Accountability** - We are accountable to all our stakeholders for the resources entrusted to us and for results towards meeting our mandate to lead and coordinate the multi-sectoral response to HIV and AIDS.
- 4.2. **Professionalism** - We uphold the highest professional standards among our staff and in our dealings with our development partners, communities and all other stakeholders.
- 4.3. **Teamwork** - We believe that as teams we accomplish much more than the sum of our parts.
- 4.4. **Innovation** - We endeavour to be proactive rather than respond to circumstances and are always looking for new approaches to benefit the national response to HIV and AIDS.
- 4.5. **Integrity** - We are committed to the highest standards of sincerity by dealing in a fair and credible manner with internal and external stakeholders.
- 4.6. **Inclusiveness** - We are committed to a multi-sectoral response to the HIV and AIDS epidemic and take measures to involve all stakeholders in addressing gender and other vulnerable groups.

5. Leadership and Governance

5.1. Board Member Responsibilities

- 5.1.1. **Leadership** - Model ethical behaviour, promote a culture of integrity, and set the appropriate tone at the top for the organisation.
- 5.1.2. **Conflict of Interest** - Declare any actual, potential, or perceived conflicts of interest and abstain from participating in related discussions or decisions.
- 5.1.3. **Monitoring and Assurance** - Oversee and regularly review NAC's ethical standards, governance systems, and compliance mechanisms to ensure they are effectively implemented.

5.2. Management Responsibilities

- 5.2.1. **Promoting Ethics** - Foster a culture of ethical behavior and open discussions about ethical dilemmas.
- 5.2.2. **Reporting Concerns** - Encourage employees to report any unethical behavior without fear of retaliation.
- 5.2.3. **Training** - Ensure that all NAC employees, volunteers, and stakeholders are adequately trained on this Code, made fully aware of its provisions, and understand its practical application in the execution of their duties.

5.3. Employee Responsibilities

- 5.3.1. **Compliance** - Adhere to the NAC's values and ethical standards in all actions.
- 5.3.2. **Supportiveness** - Report any observed misconduct and participate in creating a supportive work environment.
- 5.3.3. **Continuous Improvement** - Participate in all ethics training, induction, and refresher programmes facilitated by NAC, and apply the knowledge gained to improve ethical decision-making, professional conduct, and accountability in the execution of assigned duties.
- 5.3.4. **Awareness** - Sensitize community volunteers and stakeholders on the NAC Code of Ethics.

5.4. Consultants, Contractors and Implementing Partners

Consultants, Contractors and Implementing Partners shall be required to uphold NAC's ethical standards as a condition of engagement. They shall be expected to;

- 5.4.1. Comply with the NAC Code of Ethics, applicable laws, and contractual obligations.
- 5.4.2. Conduct activities with integrity, transparency, professionalism, and accountability.
- 5.4.3. Use NAC funds and resources responsibly and for authorised purposes only.
- 5.4.4. Protect confidential and sensitive information.

5.4.5. Cooperate in monitoring and evaluation, audits, and investigations where applicable.

5.4.6. Report suspected unethical conduct and refrain from retaliation.

6. Conflict of Interest

NAC Board members, employees, representatives, contractors, partners, beneficiaries and stakeholders shall declare any conflicts of interest and recuse themselves from decisions where conflict exist.

7. Anti-Corruption and Fraud Prevention

7.1. National AIDS Council (NAC) maintains a zero-tolerance policy towards corruption, fraud, and any form of financial or administrative misconduct. All Board Members, employees, consultants, stakeholders, and implementing partners shall be required to uphold the highest standard of integrity in the management of the Council's resources.

7.2. The following practices shall not be acceptable;

- Bribery and kickbacks.
- Procurement manipulation.
- Payroll fraud.
- Abuse of donor funds.

8. Financial Management Ethics

The organisation is committed to managing all financial resources with integrity, transparency, and accountability, in line with Public Finance Management principles. To this end, the following measures shall apply:

8.1. **Accurate Records and Segregation of Duties** - All financial transactions shall be accurately documented and supported by verifiable evidence. Financial responsibilities shall be clearly segregated to strengthen internal controls and prevent errors, fraud, or conflicts of interest.

8.2. **Audits and Budget Compliance** - Board members, staff and implementing partners shall fully cooperate with internal and external audits, adhere strictly to

approved budgets, and ensure that all expenditures are aligned with organisational objectives and donor requirements.

9. Procurement and Supply Chain Ethics

9.1. National AIDS Council (NAC) requires that all procurement and supply chain activities be conducted fairly, transparently, and in accordance with established policies and regulations. This ensures value for money, accountability, and integrity in the use of resources.

9.2. Officials involved in procurement and supply chain management shall not:

- Influence tenders, bids, or contract awards for personal or third-party gain.
- Accept gifts, inducements, or favours from suppliers or service providers.
- Share confidential bid or proposal information that could compromise fairness or competition.

9.3. All suppliers, contractors, and service providers engaged by NAC shall be expected to:

- Conduct business in line with NAC's ethical standards.
- Avoid offering inducements, bribes, or gifts to NAC officials.
- Maintain confidentiality and integrity in all procurement dealings.

10. Confidentiality and Data Protection

10.1. The Council is committed to safeguarding all programme, client, and stakeholder data with the highest standards of confidentiality, integrity, and security.

10.2. All Board members and employees shall protect programme data against unauthorised access, disclosure, alteration, or misuse, and shall strictly comply with applicable data protection laws, policies, and regulatory requirements.

10.3. Confidential information shall be accessed and shared only for legitimate organisational purposes and in accordance with approved protocols.

11. Workplace Conduct and Professionalism

11.1. The Organisation is committed to upholding a work environment grounded in dignity, professionalism, and mutual respect. All employees are required to

demonstrate integrity, courtesy, and respect in their interactions with colleagues, supervisors, subordinates, clients, partners, and the wider community.

11.2. The following behaviours are unacceptable and strictly prohibited:

- **Sexual Exploitation, Abuse and Harassment (SEAH):** Any form of sexual exploitation, abuse, or harassment is prohibited. All allegations of SEAH shall be treated with seriousness, confidentiality, and urgency.
- **Bullying and Intimidation:** This includes verbal abuse, insults, offensive remarks, threats, coercion, or deliberate humiliation. Persistent criticism or undermining of an employee's work or person and abuse of authority or misuse of power to victimise others shall not be acceptable.
- **Gossip and Rumour-Mongering:** Employees shall refrain from engaging in gossip or spreading rumours that may damage the reputation or dignity of colleagues or the Organisation. Creating hostility, division, or a toxic work environment and undermining teamwork, trust, and professional relationships shall not be acceptable.

12. Dress Code

12.1. Employees shall be expected to maintain a professional appearance at all times and to dress in a manner that reflects the organisation's values, promotes a positive corporate image, and demonstrates respect for its clients, partners, stakeholders and the community it serves.

12.2. Attire shall be expected to be clean, neat, modest, and appropriate for the work environment. Employees are required to ensure that their dress is culturally sensitive, non-offensive, and suitable for the nature of their duties, including any official meetings, field assignments, or public engagements conducted on behalf of the organisation.

13. Non-Discrimination and Inclusion

13.1. The Organisation is committed to fostering a diverse, equitable, and inclusive workplace where all employees and stakeholders are treated with dignity, fairness, and respect. Discrimination in any form shall not be acceptable.

13.2. No employee, job applicant, client, or stakeholder shall be treated less favourably on the basis of HIV status, gender, age, disability, race, ethnicity, religion or belief.

13.3. All employees shall be expected to contribute to an inclusive work environment by respecting individual differences and diversity, refraining from discriminatory language, behaviour, or stereotypes and supporting workplace adjustments or accommodations for persons with disabilities or health conditions.

14. Use of Institutional Assets

Council assets shall be used solely for official purposes and any abuse, theft, or neglect of assets shall be regarded as misconduct and shall be addressed in line with the NAC Code of Conduct and Grievance Procedure.

15. ICT and Social Media Ethics

All NAC staff with access to internet shall be expected to;

- Safeguard system passwords.
- Avoid sharing confidential information online.
- Not engage in cyber misconduct.

16. Gifts, Hospitality and Sponsorships

16.1. The Organisation is committed to maintaining integrity, transparency, and accountability in all its operations.

16.2. Employees shall therefore ensure that the offering or acceptance of gifts, hospitality and, or sponsorships does not compromise professional judgement or organisational decision-making.

16.3. Accordingly, the following principles shall be adhered to;

- Employees shall not solicit or accept gifts, favours, or benefits that may improperly influence, or be perceived to influence, official decisions.
- Cash gifts or cash equivalents are strictly prohibited.

- Any gift or hospitality linked to procurement, tendering, or contracting processes is prohibited.
- Modest, work-related hospitality may be accepted only where it is reasonable, proportionate, and transparently declared.
- Sponsorships require prior management approval and must be properly recorded.

17. Alcohol and Substance Use

17.1. The Organisation maintains a zero-tolerance policy for alcohol and substance abuse in the workplace or during official duties.

17.2. Possession, use, sale, or being under the influence of alcohol and illegal substances in the workplace, or when performing business on behalf of the council shall not be acceptable.

17.3. Council members shall be expected to report any observed or suspected cases of alcohol and substance abuse through the established reporting channels.

18. Stakeholder and Public Relations

The Council shall engage with all its stakeholders and partners in a manner that ensures transparency and accuracy in the information shared.

19. Whistleblowing, Ethics Reporting and Non-Retaliation

Reporting of unethical conduct shall be through the whistleblower channels highlighted in the NAC Whistle Blower and Non-Retaliation Policy.

20. Ethics Training and Awareness

All staff shall be expected to undergo / complete:

- Induction ethics training.
- Annual refresher training.
- Annual ethics certification

21. Annual Ethics and Integrity Commitment

Board Members and all members of staff shall, on appointment and on an annual basis thereafter, sign and renew Ethics and Integrity Commitments or

Declarations as affirmation that they will uphold integrity and adhere to this Code of Ethics.

22. Monitoring and Compliance

Compliance with this Code shall be monitored through:

- Audits
- Signed Annual Compliance Certification
- Investigations
- Performance reviews

23. Disciplinary Measures

Violations of this Code shall be dealt with in terms of the NAC Code of Conduct and Grievance Procedure and any other relevant statutes.

24. Review of the Code

This Code of Ethics shall be subject to periodic review to ensure its continued relevance, effectiveness, and alignment with applicable laws, regulatory requirements, and organisational objectives.