

The Crossing Borders Code of Conduct 2025

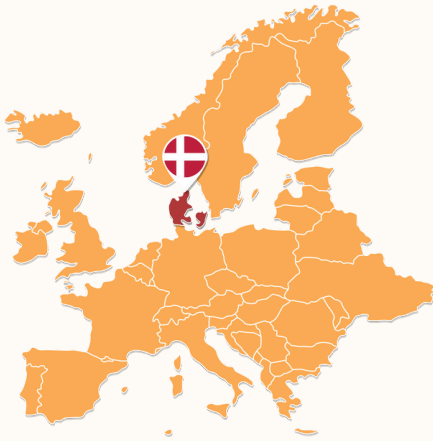


CrossingBorders

crossingborders.dk

Crossing Borders Code of Conduct 2025

About Crossing Borders (CB)



CB is a non-profit, civil society organization based in Copenhagen, Denmark. In 1999, CB started out as a project to support dialogue in the Middle East and in 2004, it was registered as an NGO, we can look back to more than 20 years of an impressive track record.

CB mission is to educate and empower young people to become active global citizens and raise awareness of educators on global issues with the aim to contribute to a peaceful and sustainable world. Across cultures and professions, we provide platforms for people to cross-fertilize ideas and form global associations, networks, and communities worldwide. In a learning environment where all participants are encouraged to grow and learn from one another, CB enables youth to share their best ideas, best products, and best practices.

We therefore provide capacity building and space for youth to act to create space for dialogue. Youth are empowered to become active citizens whose human, civic and social rights are integrated and mainstreamed in the development policies of their home countries.

The core CB activities comprise the following programs:

- School workshops aimed at bringing the world to the Danish classrooms
- Food for Thought aimed at providing a safe space for people to share their life stories, learn from one another and build communities
- Migrantour aimed at empowering emigrant to tell their stories by guiding students and groups around the neighborhoods they call home
- Empowering Ukrainian Youth to have safe spaces where they can meet and host Danish and other youth in four hubs in Aalborg, Aarhus, Odense and Copenhagen
- EU program focusing youth participation, adult education and green entrepreneurship
- Global Program in Africa, the Middle East, Caucasus and India with focus localizing the SDGs, Peace Building, Empowering Youth and Women
- Events like the International National Day, Mandela Day, etc



CB has a diverse team of staff members, interns and volunteers, Executive and Advisory Boards from different countries and professional backgrounds. In addition, CB has national coordinators in 50 countries recruited from among the more than 17000 youth alumni who have been part of our programs. Together, these alumni support the mission and vision of CB all over the world in Europe.

1. Introduction

1.1 Background

This Code of Conduct presents an overview of CB principles, guidelines, practices, and values for the main areas in the organization's local activities and projects abroad. The mission, values and 20 years of experience as an organizer and partner in many international projects and events, form the basis of this Code of Conduct. This document aims to clarify for CB and its partners', in a transparent manner, the underlying principles of the organization's works.

1.2 Revision

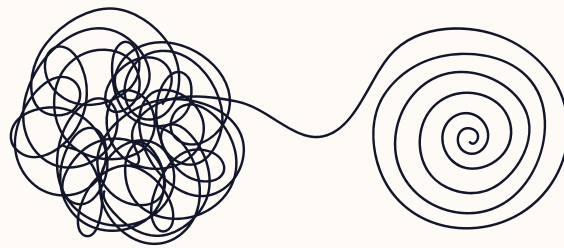
The Code of Conduct is open for changes and updates according to the needs of the current situation. Hence, the Code of Conduct is to be reviewed and updated annually. The Board needs to approve any important changes. CB management will draw up a plan for regular monitoring to guarantee the implementation of actions written down in this document. A team of employees will be assigned to support the monitoring and management of the code of conduct, this provides input for ongoing development of the document.

1.3 Target Groups

This Code of Conduct is designed for the whole CB organization, its stakeholders', and other relevant parties. CB structure consists of an Executive Board, Advisory Board and Secretariat led by an executive director, project coordinators, interns, and volunteers. By signing the employment contract with CB, every employee confirms that they have read, understood and adhere to this Code of Conduct.



The second target group are stakeholders such as institutions, organizations, companies, and other third parties that are wishing to collaborate with CB. These partners might receive or offer services, develop and implement projects, or attend CB events. These partners and external stakeholders are vetted to ensure they are safe to collaborate with.



1.4 CB philosophy

All CB activities are based on its philosophy which stipulates that humans are only humans in and through the eyes of other fellow humans. Through our projects and events, we aim to unite people from different countries, professions, and generations to learn to live together on equal terms. Society needs to realize that our individual and national wellbeing is interwoven with that of fellow humans everywhere. We, therefore, create space for dialogue as people need access to valuable information directly from each other without filters. Our focus lies on the connection between society and the planet, as well as the interconnectedness of the different communities worldwide. This philosophy and the core values form the framework for all of CB activities.

1.5 CB Fundamental Values

The following values define our daily work at CB as staff and Board Members. They draw a framework that points to how we at CB see the world and approach relations with other individuals and organizations. Fulfilling these values everyday substantiates CB credibility and legitimacy.



Diversity, Equity and Inclusion (DEI):

DEI are the main CB values and can be seen in who we are, our partners and everything that we do. You will find DEI at every corner in CB, the individuals working in the organization from employees and volunteers to Board and Advisory Board members from more than 20 nationalities. The staff are diverse in that they come from different backgrounds, nationalities, ages, and genders. Apart from the staff, the participants of the courses and activities are also from different countries and bring different knowledge, experiences and practices to the group which are then shared. We also use our projects and events to raise awareness about other countries and global issues, to foster intercultural exchange to empower people to become global citizens. Furthermore, in the way it facilitates learning and development of young people, we are working on frames of teaching to include everyone in the process of learning and developing on different terms.



2

Authenticity:



Authenticity is the key to open the possibilities of dialogue. We do not tell the story of another person for them, but we create space for people to tell their own stories and get their voices heard. We believe that the best story telling lies in authenticity and that dialogue which is built on authenticity broadens the way we think. The aim is to educate the young generation to take action in a world of endless possibilities.

3

Volunteering and Participation:

CB is based on a combination of paid and voluntary work as, on the one hand, many employees join the organization first as volunteers or interns. This creates space for voluntary involvement in civil society.

4

Mutual respect and Acceptance:

Every person is unique, and people are treated as such at CB. Cultural diversity and different viewpoints are welcomed and considered as assets.



5

Collaboration:

CB work is based on collaboration with other institutions and organizations in Denmark as well as other countries. We believe in sharing knowledge as a path to reach better, more sustainable results.

6

Transparency:

We strive for transparency in all our actions. Transparency mainly refers to the reporting about our activities. We present all our projects, events and activities in an accurate, complete and honest manner in our annual report. Audited annual financial and activity reports are available on our website for all interested. Moreover, we publish our activities and share stories about the impact we create with our projects regularly on our webpage and on our social media channels. We also organize public events where we present our work and increase the awareness of the Danish public about different intercultural topics (e.g. "Food For Thought" events). CB also publishes its guidelines for the membership to see, including the service and the fee.

7

Accountability:

We understand accountability regarding good governance which refers to all our finances and the organizational social impact. We accept and take responsibility for our actions and decisions towards the donors, project partners, beneficiaries, and employees. This Code of Conduct represents part of our understanding of accountability as it includes our core values and our main principles and guidelines. Regarding the received funds, we guarantee that the money is spent according to the project guidelines. We also strive to make CB sustainable (also in financial terms) to guarantee its appropriateness as an independent organization and reliable partner. Each project is preceded by an accurate and detailed need assessment to guarantee that existing social needs are tackled, and that individual self-confidence is increased.

8

Learning and Exchange:

We value the exchange of knowledge and insights among our employees, partners and other stakeholders. We encourage intercultural encounters not only within our international projects but also during daily work in the office. Our diverse team regarding cultural and professional backgrounds and the high number of interns with different study programs help to enrich our project portfolio.

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Innovation:

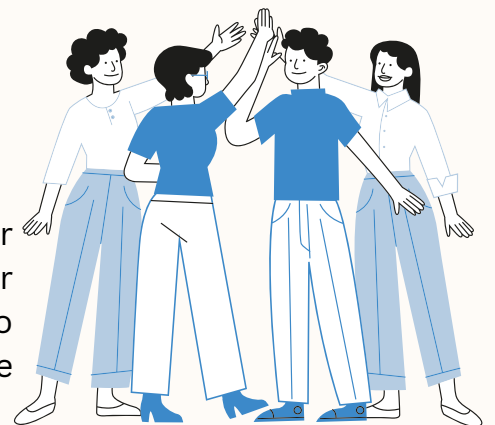
We aim to have innovative projects by developing new methods and technologies for the projects and activities, as well as collaborating with new partners with whom we complement.

10

Teamwork:

Our work is built on teamwork as we integrate our different competencies and backgrounds into our activities to reach the best outcome. We also integrate the local partners in the projects from the start until the end of the project as they know best

the circumstances, partners and networks on-site. This is also part of the empowerment of locals that we want to reach throughout our projects.



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Trust:

We trust in each other's competencies and knowledge in regard to the management of the projects and any other work-related activities.

1.6 Information for Collaborating Partners

CB annual report shall include, from 2025, a chapter about the use and compliance with its' Code of Conduct. It contains a summary of breaches of the Code of Conduct.

We apply the values and principles mentioned in this Code of Conduct in our daily work in the office and when collaborating with our partners and stakeholders. In all our understandings, CB acts responsibly, in an open-minded and trustworthy fashion. With our focus on diversity, authenticity, respect and teamwork as main pillars of our value framework, we also want to act as a role model for other organizations to follow our path. CB encourages its partners and other stakeholders to follow the same guidelines for their work together with CB and to define principles and values for their own organization and activities.

1.7 Preventing Breaches of the Code of Conduct

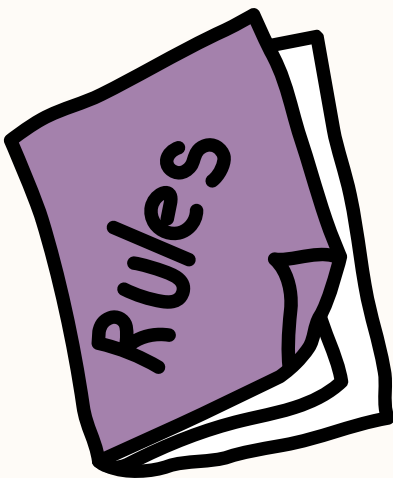
CB will make its Board members, staff, and stakeholders aware of their responsibilities according to the Code of Conduct. Before signing employment or collaboration contracts, the employees and partner organizations are requested to read this Code of Conduct and sign that they have read and will follow it. Our staff are trained to follow the Code of Conduct in their daily work and to guide our partners and stakeholders on how to follow the document. Specific guidelines for the preventions of breaches regarding CB principles concerning its ethics, zero-tolerance attitude, safeguarding guidelines against sexual exploitation and abuse of power, gender identity and sexual orientation, along with anti-corruption policy can be found in the respective chapters within the document.

At CB, we ensure that every staff member is familiarized with the guidelines and processes involved with coordinating projects to ensure quality and reliable work. We understand the importance of running projects properly and being consistent so that our partners feel comfortable when we assist them with project coordination.

1.8 Consequences of Violating the Code of Conduct

CB will react to any breaches or violation of the principles and intentions of this Code of Conduct, corresponding to their nature, scope and severity - ranging from recommendations and requirements to actual sanctions.

We will impose various types of sanctions against persons, companies or organizations that have seriously violated this Code of Conduct. This includes disciplinary measures against CB's own employees and collaborating partners (warning/dismissal or exclusion), the termination of contracts with partners and suppliers, or submitting a police report in respective of criminal matters. CB can claim compensation for damages suffered.



1.9 CB Management Structure

CB is managed under a three-tier structure that comprises of: *The Executive Board, The Secretariat, and The CB Advisory Board*. Together the three components work for the aims of the CB that are decided by the general Assembly comprised of CB members.



The CB Executive Board is the policy making organ of CB also is responsible for ensuring that the organization operates according to the law. Their job is to support the organization to achieve its objectives in a transparent, accountable and legal manner. At each meeting, the Board among others follow-up on the CB finances, makes guidelines around the CB financial systems, and ensures that these finances are according to the rules. The Board is also the CB organ that approves all the annual reports (both financial and narrative) of the organization, and thus an accountable body.

The day-to-day running of CB is managed by a **secretariat** of staff, volunteers and interns led by the Executive Director. The job of the secretariat is to implement the policies and objectives of the organization.

The CB Advisory Board although not involved in the day-to-day running of CB, contribute valuable knowledge and network to further the interest and sustainability of organization



2. Ethical Principles and Guidelines

2.1 Fundamental Ethical Principles

The ethical principles of CB are based on its values mentioned above. These values and principles represent a human rights-based approach. The following chapter explains the values in more detail and the way they can be transformed into the ethical principles of CB work.

2.1.1 Transparency and confidentiality

We aim at maximum transparency regarding the partnering organizations, donors, the press, and society about projects, events, and the development of the organization. At CB, privacy and personal or sensitive data on staff or partnering organizations are kept confidential and safe.

Building social capital

CB promotes good and healthy working relations and fosters the development of social capital among employees, with the Board, partner organizations and other stakeholders.

2.1.2 Non-discrimination

CB is an intercultural organization. As an organization and within our projects, events and further activities, we respect other people by not discriminating others due to differences in gender, race, ethnicity, sexual orientation, religion, culture, age, education, social status, or nationality.

2.1.3 Zero-tolerance of abuse of power, position, or resources

Neither as an organization nor within our activities, will CB put its own individual interests above the ones of other individuals or organizations, CB will further not influence them by taking advantage of its position. In addition, the organization's resources will only be used for the organization and its projects, not for individual purposes. We ensure that all employees and Board members comply with this principle.

2.1.4 Real and potential conflicts of interest

We avoid any kind of conflict between interests of employees or Board members which have consequences on the development and implementation of the organization's activities. Personal interests might contain advantages for family, friends, or other business relationships.



2.2 Daily Application of the Ethical Principles

2.2.1 Translation into day-to-day work of the organization

Everyone's duty at CB is to inform the Board about real or potential conflicts of interest. If impartiality is at risk, this person cannot participate in discussions and decisions concerning the impacted project.

Any employee or Board member will not give, pass on, or receive directly or indirectly any gifts or favours that might have an impact on CB's impartiality. This does not comprise small gifts such as meals and ordinary gifts in relation to birthdays. Minor gifts related to CB performance will be shared by all employees. Our anti-corruption policy contains a detailed approach to addressing corruption (see Section 4)

2.2.2 Reporting unacceptable circumstances

If we suspect or discover incidents or circumstances within the organization or at a partner organization that do not comply with our values and principles, we are obliged to report this information to the Board. Entry points for reporting feedback, unacceptable circumstances/incidents and processing complaints are described in Section 8. The section also includes a description of how CB protects employees in the cases whistleblowing.

2.2.3 Translating ethical guidelines in connection with business trips

On business trips within and outside Denmark, we commit ourselves to behave according to the organization's values and ethical principles and seek to promote them among the partner organizations.

3. Safeguarding

This section will continuously be updated when the guidelines for protection against sexual exploitation and abuse of power have been expanded.

3.1 Sexual Harassment, Exploitation and Abuse

3.1.1 Definition

CB uses the term 'Sexual harassment, exploitation and abuse' (SHEA) which is defined by the United Nations as:



- Sexual Exploitation: *Any actual or attempted abuse of position of vulnerability, differential power or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another.*
- Sexual Abuse: *Actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.*

This part about Safeguarding only covers sexual abuse. Other forms of abuse are included in other chapters of this Code of Conduct, such as anti-corruption.

The Danish Criminal Code

Chapter 24 of the Danish Criminal Code concerns sexual offences. The most important sections are: Sections 226, 232, 234 and 235 on indecent exposure (exhibitionism, groping, voyeurism, verbal indecency) and recording, possession and dissemination of photos/films etc. Section 216 on rape. Sections 219, 222, 223, 224 and 225 on sexual violence against children and young persons. Sexual harassment, exploitation and abuse (SHEA) committed in countries outside Denmark by persons living in these countries fall under the criminal code of the relevant countries.

Source: <https://www.retsinformation.dk>

3.1.2 Safeguarding against sexual harassment, exploitation, and abuse



Everyone is entitled not to be at risk of becoming a victim of sexual harassment, exploitation, and abuse. CB practices of zero-tolerance are based on the Danish criminal law. We do not accept any kind of sexual harassment, exploitation or abuse within and outside the organization and among any person or organization that collaborates with CB. Thus, based on the human rights to dignity and a life in safety, we actively work for the protection of the people involved in CB or its partners' activities. This part about Safeguarding defines the approach for the protection of SHEA, which is influenced by the ethical principles and refers to other parts of this Code of Conduct.

We prohibit any kind of both potential sexual exploitation and potential abuse of power and interferes and sanctions in cases of abuse or suspicion of abuse. Such cases will also serve as a source of learning to improve the prevention and handling of such cases.

3.1.3 Prevention of sexual exploitation and abuse of power

3.1.3.1 At CB

CB aims to create an open and safe environment, which allows all employees to feel included and respected and where the human rights and ethical guidelines set by the organization are applied. All employees and Board members are called upon to create and maintain this open and safe environment. This safe work environment aims to ensure that no staff or Board member is exposed to any kind of harassment, exploitation, or abuse. CB management takes care of making all employees and Board members aware of their responsibilities, right, and guidelines when dealing with safeguarding issues at CB.

CB management assures that the necessary capabilities are present within the organization and that the knowledge and competencies will be expanded on a regular basis through external cooperation and, where necessary, with the help from external experts.

3.1.3.2 Employees and members of assessment system

Safeguarding forms an important part during the recruiting process of new employees and members. Job advertisements refer to this Code of Conduct. Safeguarding can also be included in connection with obtaining references from previous jobs, if deemed necessary. CB will present its guidelines for safeguarding against sexual harassment, exploitation and abuse to every new employee and Board member as part of the Code of Conduct. Staff consultation (MUS) is conducted with each employee twice a year.

3.1.3.3 Board

It is the duty of CB Board to assure compliance with CB guidelines on safeguarding. The compliance is audited by the Board at the annual Code of Conduct discussions.



In case of a violation of the safeguarding guidelines, CB management must notify the Board as soon as possible.

3.1.3.4 Other stakeholders

CB aims to guard against any sexual exploitation and abuse of power by informing its stakeholders of their rights and obligations through its capacity building activities, communication, contracts and cooperation agreements, etc. We acknowledge that some groups of society are more vulnerable than others, which include children and people in weak or vulnerable humanitarian situations, in which human rights are not guaranteed.

We actively communicate our guidelines on safeguarding against sexual exploitation and abuse of power and guarantee that all stakeholders and partners are aware of our zero-tolerance policy towards sexual harassment, exploitation and abuse. Safeguarding forms part of all contracts by CB and a violation of these guidelines can result in a direct termination of the contract after due process. CB motivates every partner and stakeholder to develop and implement measures to safeguarding.



Reports on sexual exploitation and abuse of power

CB takes all reports on sexual exploitation and abuse of power seriously and investigates and act on them promptly.

3.1.3.5 At CB

According to our organizational culture, it is the duty of every employee and Board member to react on matters that violate the organization's ethical principles. This means that if someone at CB experiences or observes conditions or situations at the workplace that violate the ethical principles of safeguarding, they need to report it to the management. This entails acts of sexual exploitation and abuse of power.

Complaints can be filed on:

yourcomplaint@gmail.com or <https://crossingborders.dk/contact-us/>

3.1.3.6 Externally

Sexual harassment, exploitation, or abuse of power can be reported by an identified sender or anonymously, and confidentially, and by anyone who may have observed anything in connection with CB or its partners' and stakeholder's work. Persons who have been victims of sexual exploitation and/or abuse of power can report the incident themselves or through a person they trust.

3.1.4 Follow-up

3.1.4.1 Internally

In the case of sexual exploitation or abuse of power at CB, the parties involved will be offered qualified emergency counselling as quickly as possible. It is possible to receive advice, psychological counselling or similar services paid by CB when needed.

3.1.4.2 Communication

CB communicates at a general level about received complaints that have led to case processing and a decision. CB balances the various legal and ethical considerations in its communication, for example, by considering personal data processing regulations.

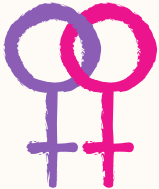


3.2 Gender Identity and Sexual Orientation (LGBTQ)

This section is dedicated to CB policies regarding a person's sexual orientation or the gender they identify with.

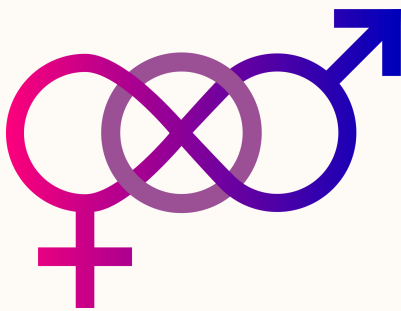
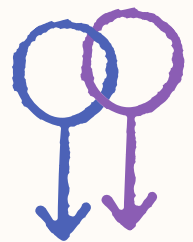
3.2.1 Definition

CB uses the acronym LGBTQ which stands for lesbian, gay, bisexual, transgender and queer or questioning. The single terms are defined as follows:



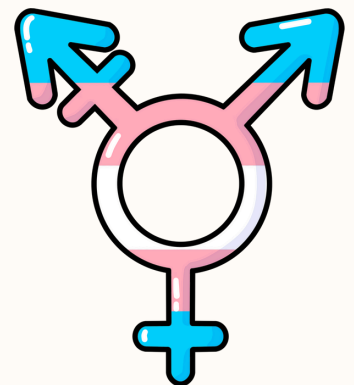
Lesbian: A woman whose enduring physical, romantic, and/or emotional attraction is to other women. Some lesbians may prefer to identify as gay or as gay women.

Gay: The adjective used to describe people whose enduring physical, romantic, and/or emotional attractions are to people of the same sex. Sometimes lesbian is the preferred term for women.



Bisexual: A person who has the capacity to form enduring physical, romantic, and/or emotional attractions to those of the same gender or to those of another gender. People may experience this attraction in differing ways and degrees over their lifetime. Bisexual people need not have had specific sexual experiences to be bisexual; in fact, they need not have had any sexual experience at all to identify as bisexual.

Transgender: An umbrella term for people whose gender identity and/or gender expression differs from what is typically associated with the sex they were assigned at birth. People under the transgender umbrella may describe themselves using one or more of a wide variety of terms—including transgender. Many transgender people are prescribed hormones by their doctors to bring their bodies into alignment with their gender identity. Some undergo surgery as well. But not all transgender people can or will take those steps, and a transgender identity is not dependent upon physical appearance or medical procedures.



Queer: An adjective used by some people, particularly younger people, whose sexual orientation is not exclusively heterosexual. Typically, for those who identify as queer, the terms lesbian, gay, and bisexual are perceived to



be too limiting and/or fraught with cultural connotations they feel don't apply to them. Some people may use queer, or more commonly genderqueer, to describe their gender identity and/or gender expression. Once considered a pejorative term, queer has been reclaimed by some LGBT people to describe themselves; however, it is not a universally accepted term even within the LGBT community.

Questioning:

Sometimes, when the Q is seen at the end of LGBT, it can also mean questioning. This term describes someone who is questioning their sexual orientation or gender identity.

Source: <https://gaycenter.org/about/lgbtq/>

3.2.2 Safeguarding against discrimination of LGBTQ

Everyone shall be entitled to have the freedom to live according to their identity, which also includes a person's sexual orientation and gender. We define our understanding of diversity not only regarding culture but also regarding gender and sexual orientation. We provide a friendly, safe and welcoming environment for all, which also includes gender and sexual orientation. This means that LGTBQ are not stigmatized and made to feel offended by transphobic remarks, and do not feel anxiety about interacting with their colleagues.

CB lives practices of zero-tolerance and does not accept any kind of discrimination of LGTBQ people within and outside the organization and among any person or organization which collaborates with CB. Therefore, we actively work for the protection of the people involved in CB' or its partners' activities. We prohibit any kind of discrimination of LGBTQ people and interfere and sanction in cases of discrimination. Such cases will also serve as a source of learning to improve the prevention and handling of such cases.

3.2.3 Prevention of discrimination of LGBTQ+

3.2.3.1 At CB

CB aims to create an open and safe environment, which allows all employees to be accepted and respected and where the ethical guidelines set by the organization are followed. All employees and Board Members are called upon to create and maintain this open and safe environment. This safe work environment aims to ensure that the staff and board are not discriminated because of their gender identity or sexual orientation. CB' management takes care of making all employees and Board members aware of their responsibilities, right, and guidelines when dealing with safeguarding at CB. We, therefore, protect and provide the rights of LGBTQ and increase the staff and board's understanding and acceptance of issues related to gender identity and sexual orientation.

CB' management assures that the necessary capabilities are present within the organization and that the knowledge and competences will be expanded on a regular basis through external cooperation and, where necessary, with the help from external experts.

3.2.3.2 Recruitment of new employees

Safeguarding forms an important part during the recruiting process of new employees and members. Job advertisements refer to this Code of Conduct. CB is committed to never rejecting applicants because of their gender identity or sexual orientation. CB will present its guidelines for safeguarding against discrimination of LGBTQ to every new employee and Board member as part of the Code of Conduct.

3.2.3.3 Board

It is the duty of CB Board to assure compliance with CB' guidelines on safeguarding. The compliance is audited by the Board at the annual Code of Conduct discussions. In case of a violation of the safeguarding guidelines, CB' management must notify the Board as soon as possible.

3.2.3.4 Other stakeholders

CB aims to avoid forms of discrimination of LGBTQ by informing its stakeholders of their rights and obligations through its capacity building activities, communication, contracts and cooperation agreements, etc. CB actively communicates its guidelines on safeguarding against discrimination of LGBTQ and guarantees that all stakeholders and partners are aware of CB' zero-tolerance policy towards any kind of discrimination. Safeguarding forms part of all contracts by Crossing Border and a violation of these guidelines can result in a direct termination of the contract. CB motivates every partner and stakeholder to develop and implement approaches to safeguarding, also in regard to the discrimination of LGBTQ.

3.2.4 Reports on discrimination of LGTBQ+

CB takes all reports on discrimination of LGTBQ seriously and investigates them thoroughly.

3.2.4.1 At CB

According to our organizational culture, it is the duty of every employee and Board member to react on matters that violate the organization's ethical principles. This means that if someone at CB experiences or observes conditions or situations at the workplace that violate the ethical principles of safeguarding, they need to report it to the management or the Board. This entails acts of discrimination regarding gender identity and sexual orientation.

3.2.4.2 Externally

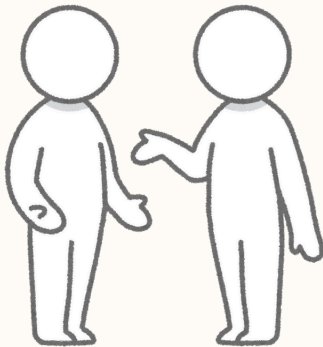
Any form of discrimination of LGBTQ+ can be reported by an identified sender or anonymously, and confidentially, and by anyone who may have observed anything in connection with CB' or its partners' and stakeholder's work. Persons, who have been victims of discrimination, can report the incident themselves or through a person they trust.

3.2.5 Follow-up

3.2.5.1 Internally

In the case of discrimination of LGBTQ at CB, the parties involved will be offered qualified emergency counselling as quickly as possible. It is possible to receive advice, psychological counselling or similar services paid by CB if needed. Every incident is treated as source of improvement of CB safeguarding guidelines.

3.2.5.2 Communication



CB communicates at a general level about received complaints that have led to case processing and a decision. CB balances the various legal and ethical considerations in its communication, for example, by considering personal data processing regulations.

4. Anti-corruption and Irregularities

4.1 Target Group

CB' anti-corruption policy includes its principles for preventing, managing and detecting corruption, fraud, and abuse and taking action. These anti-corruption policies form an important part of our measures to increase our accountability and legitimacy to our stakeholders. The policy applies to CB and all types of partners when grants are shared for projects and events. To a certain extent, it also applies to other stakeholders. The following sections are dedicated to describing how the policies apply to the different target groups.



4.2 Objective: to avoid corruption, fraud, and abuse altogether

CB does not tolerate corruption, fraud or abuse of any kind, neither within the organization itself nor in relation to our stakeholders and partners. We constantly focus on preventing and monitoring corruption, fraud, and abuse in CB, its partners and stakeholder in connection with grants. We apply a zero-tolerance principle as we are aware of the negative consequences that breaches of our anti-corruption policies might have on the organization's existence and mission.

Prevention of corruption, fraud, and abuse is closely linked to the development of legitimate organizations in the countries of intervention, which are characterized by transparency and democratic control. The organizations should establish structures to guarantee that management and employees are held accountable by their own board or other institution.

4.3 Definition

For CB to be able to discover and react adequately to all possible cases of corruption, different corrupt practices need to be defined. Corruption might happen in the environment surrounding the intervention (contextual corruption), in the humanitarian system and its actors (systemic corruption), and within an organization (intra-organizational corruption). CB basic understanding of corruption is "the misuse of entrusted power and resources for private gain" (transparency.org). "Private gain" includes family members and friends, personal and work-related networks, and platforms strengthening the power of the person(s) involved.

4.3.1 Examples of corruption

Misuse of resources can take many forms: fraud in connection with audits, deliverables not covered by an agreement, incorrect prices or faulty equipment, incorrect invoicing of staff or equipment, bribery or acceptance of gifts, misadministration of resources, fraud in connection with business trips or official journeys, theft, etc.

Similarly, abuse of entrusted power can take many different forms: psychological, physical or sexual harassment, discrimination, unauthorized access to privileges or arbitrary/unauthorized grants of privileges, abuse of power and relationships in recruitment processes, etc.

4.3.2 Contextual and systemic corruption

We recognize that some of our projects and activities take place in countries where corruption can be widespread due to socio-economic conditions. We, therefore, demand our partners and stakeholders abroad to do their utmost to avoid and prevent corruption, fraud, and abuse. Nevertheless, we accept while they may involuntarily be affected by the problem. CB believes that prevention is the best and most important form of intervention. The aim lies in the reduction or elimination of any irregularities, including corruption, fraud, and abuse. In the case of such irregularities, we aim to reduce their consequences and to guarantee adequate and efficient follow-up, suitable to the scope of the case.

4.4 CB' Corruption Risk Management Framework

CB is not allowed to contribute to corruption, fraud, or abuse, neither actively nor passively. Despite local customary practices, CB will not jeopardize its integrity, values and ethical principles. Consequently, CB sets up its corruption risk management framework that is built on self-regulation and internal rules and procedures. These are closely linked to the high standards of transparency and accountability (see Section 2.1.1).

4.4.1 Prevention mechanisms

We put a strong emphasis on the prevention of possible corruption practices and the protection of our staff to not be at risk of being trapped in conflicts. We, therefore, inform our staff of the Code of Conduct as to prevent misbehavior and ensure good practice. This Code of Conduct as a prevention measure for corruption as it entails our values, ethical principles, and zero-tolerance statement as well as the explanation of corruption and the expected behavior of the staff.

CB actively aims to prevent its stakeholders and partners from contributing to corruption, fraud, or abuse, whether actively or passively, and despite the local conditions. By exchanging opinions, knowledge and methods the motivation and capacity of the stakeholders and partners will be improved to take real action.

Detection mechanisms

Our detection mechanisms mainly refer to monitoring activities. When we conduct projects at CB, we continually monitor them to ensure they are being conducted correctly.

4.4.2 Investigation and sanctioning

There exists a sanctioning policy for different scopes, natures, and seriousness of a violation of our anti-corruption policies. We also have protocols for communicating breaches and reports of complaints. See section 4.4.2 for more information. In case of any suspicion of corruption, our staff are required to report to the relevant authority directly or anonymously using the complaint form on the website: yourcomplaint@gmail.com or <https://crossingborders.dk/contact-us/>

5. Anti-terror Policy

CB understands and complies with the the international rules and regulations regarding terrorism as stipulated in the UN and EU policies and terror lists.

5.1 Terrorism is the use of violence for political ends by non-state actors who have been designated as terrorists.

5.2 Based on this understanding CB has developed measures and procedures for screening partners, collaborators, suppliers and others against the EU and UN terror lists.



5.3 The policy and procedures include thorough screening of partners and potential partners and stakeholders. It also includes the deployment of Due Diligence and signing of MOU that the partners adhere to the anti-terrorism policy in their organisation.

5.4 These measures enable us to make sure that the partners and potential partners and stakeholders are not on the terror list of the UN and/or EU.

6. Child and Young People's Rights Policy



Though CB does not work directly with children, we find it necessary to have a clear child rights and protection policy. The purpose of this policy is to foster, protect and advance the human rights of children and young people as part of CB work and services and inform all staff members about these guidelines and CB' approach to child rights.

6.1 Our Approach

Accordingly, we in CB wholeheartedly believe that a child or young person should be provided with all the rights that are enshrined in the below listed UN legal framework. As such, we believe that children and young people should never experience or be subjected to abuse of any kind. We have a responsibility to promote the welfare of all children and young people and to keep them safe as children. Hence, we are committed to and align all our activities in a way that promote the right of children and to protect them from any physical, moral, psychological and cultural violence or neglect.

6.2 Legal Framework

This policy has been drawn up on the basis of law and guidance that seeks to protect children:

- **Children Act 1989**
- **United Convention of the Rights of the Child 1991**
- **Data Protection Act 1998**
- **Sexual Offences Act 2003**
- **Children Act 2004**
- **Protection of Freedoms Act 2012**
- **Relevant government guidance on safeguarding children**

6.3 Our Understanding

We recognize that

- the welfare of the child is paramount, as enshrined in the Children Act 1989
- all children, regardless of age, disability, gender, ethnicity, religious belief, sexual orientation or identity, have a right to equal protection from all types of harm or abuse
- some children are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues
- working in partnership with children, young people, their parents, carers and other agencies is essential in promoting young people's welfare.

6.4 Our Measures

We will seek to keep children and young people safe by:

- valuing them, listening to and respecting them for what they are as children
- adopting child protection practices through procedures and a code of conduct for all our personnel
- developing and implementing an effective e-safety policy and related procedures
- providing effective management for staff and volunteers through supervision, support and training and relevant information
- recruiting staff and volunteers safely, ensuring all necessary checks are made
- sharing information about child protection and good practice with children, parents, staff and volunteers in connection with our services.

6.5 Dealing with non-compliance

In the case of any allegation of non-compliance with the above guidelines, immediate and appropriate action will be taken in fair manner. Should allegation turn out to be true, the concerned personnel's association with CB will be terminated immediately.



7. Risk Management Process

When CB sees itself with a risk for its staff, partners, and local communities of the projects, the following risk management process is applied.



Analysis of the context: A thorough context analysis is developed.

Identifying the risk: Risk for the specific country and areas of actions are identified. Security forums are established within each partner organization to ensure that various meetings or mechanisms exist within the organization where security issues and challenges can be raised and discussed. It is ensured that security is a standing agenda item at key meetings.

Analysis of the risk: A risk analysis is conducted. Control mechanisms are established which offer the possibility for target groups, external stakeholders and internally in partner organizations to raise complaints and concerns regarding important issues.

Establishing a mitigation strategy: A mitigation strategy is established on the basis of the context analysis.

Risk monitoring and evaluation: Risks are continuously monitored and evaluated in order to adjust the activities accordingly.

These steps of the risk management process are included in every project and are present within the objectives, results, activities, and indicators. CB is continuously communicating with and consulting their partners and stakeholders.

7.1 Measures to Handle Emergency Cases Like Pandemics

Like other institutions, emergency cases of pandemics affect the work of CB, its partners and stakeholders. The following points give a short overview of the major steps that CB takes to secure the health and well-beings of its staff, volunteers, interns and partners.

- Develop contingency plans to provide the personnel with necessary protection and the right information and require them to take all possible precautions/safeguards, which are established in close coordination with and permission from the relevant authorities.
- Carry out our activities in the safest manner possible, to communicate relevant and customized information to our staff in the languages they understand and use relevant communication methods to transmit messages to the target groups to raise awareness to the recipients effectively.
- Ensure that CB' office is always equipped with emergency kits and special guidelines how to use them.

8. Security

8.1 General Security

CB does not send or assign people to unsecure areas, countries and anyone to any risk. Our volunteers get a detailed introduction about biking in Copenhagen and the need to pay attention and to wear helmets. We also do not host our guests or volunteers in unsecure zones. In terms of general health and safety policy of our offices, all employees and volunteers are informed of emergency exits in case of fire or emergency of another nature.

8.1.1 Legal security

CB employees and Board members are insured as required by the Danish labor law and board responsibility act. The employees are instructed to learn, understand and comply with the law of the land, not to engage in any thing that is not legal and/or safe.

8.1.2 Financial security

The overall financial responsibility at CB rests upon the Executive Director (ED) and the CB Executive Board. These together shall ensure proper accountability mechanisms for the financials of the organization. The main roles and responsibility regarding financial management are held by the Executive Director (ED), and Accountant/Bookkeeper, a designated Financial Administrating staff (Financial administrator). To ensure proper financial management, CB runs (1) a bank several bank accounts, (2) internal financial management processes and events, and (3) external financial controls through auditing. The bank account is reconciled monthly by the ED and 1 Program Coordinator and the Accountant/Bookkeeper. CB uses an accounting system, where all CB activities are allocated in separate accounts to aid easy follow-up and accountability. To ensure an up-to-date financial system, Crossin Borders conduct quarterly budget follow-ups, monthly reconciliation of all bank accounts, and annual reports and reviews of all bank accounts. Any transfer of funds from any of the CB accounts requires the approval of 2 persons from the management.

8.1.3 Employee safety

Fortunately, CB is not in and does not send any employee to countries or places where violent conflicts exist. The working place is safe and clean; it is cleaned thoroughly every day. We provide all the necessary guidance, sanitization and comply with the official guidelines of the public authorities. In case of emergency, employees know where the emergency exits are.

8.1.4 Physical security

As indicated above, CB employees are not involved in any things that risk mental or physical dangers. Therefore, we believe that each member of our staff is physically safe.

8.1.5 Communication security

8.1.6 Security when travelling abroad

When travelling abroad outside the EU, employees have travel insurance and are given the CB insurance travel card to bring.



9. Complaints and Reporting System

9.1.1 Areas covered

9.1.2 Complaints and reporting of unacceptable circumstances

Complaints and reports can be submitted about intolerant circumstances in all parts of CB work portfolio, including areas covered by this Code of Conduct. These complaints and reports can refer to the way CB implements and manages its projects and activities both in Denmark and abroad, and about employees involved in carrying out these interventions.

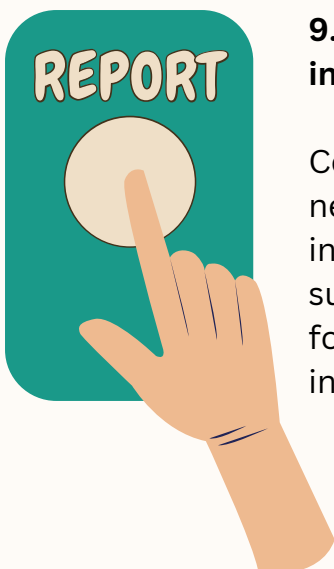
9.1.3 Complaints procedure and principles

According to our value of transparency, we foster a culture of openness with easy access to submit a complaint, transparent procedures for dealing with complaints, and clearly stated reasons for decisions.

No complaints will be subject to reprisals or other discriminatory action by CB. Nevertheless, we may impose consequences against persons or organizations that are proven to have made false accusations. We may also impose disciplinary measures against our own employees (warning/dismissal/exclusion), cancel contracts with partners and stakeholders, file a police report in criminal matters or claim compensation for damage suffered.

9.1.4 Irregularities reported by partners

Our partners are obliged to report all significant irregularities during the implementation of the interventions which are organized together with us.



9.1.5 Complaints or reports of unacceptable circumstances in intervention supported by CB' funding

Complaints about circumstances within interventions supported by CB need to be filed and dealt with as close to the activity as possible. For instance, complaints from the target group should generally be submitted to the local partner. In case that the partner is the reason for the complaint, the complaint should be submitted to the next stage in the chain, which is usually CB.

9.1.6 Whistle-blower scheme

Complaints and reporting procedures include a whistle-blower scheme: CB uses the following definition of whistleblowing (from Transparency International): "The disclosure of information about a perceived wrongdoing in an organization, or the risk thereof, to individuals or entities believed to be able to effect action".

CB recognizes that people reporting irregularities or suspicion of corruption or abuse may feel pressure. As we want whistle-blowers to be safe when providing information, we will guarantee that whistle-blowers can inform CB as easily as possible and, as far as possible, we will protect whistle-blowers against reprisals from the organization or persons they report about.

Therefore, we will keep the identity of a whistle-blower confidentially and make every effort that the whistle-blower will not suffer retaliation. There will be no sanctions against wrong information, if the report proves incorrect. However, we may impose various consequences against persons who are proven to have made false accusations, such as disciplinary measures, cancelling contracts, filing a police report, or claiming compensation for damage suffered.

It is also possible to report unacceptable circumstances anonymously both internally at CB and externally, through email to the responsible authority or anonymous reports that can be made by telephone.

9.2 Filing and Processing Complaints

9.2.1 Filing a complaint or reporting unacceptable circumstances

Internally at CB, complaints or reports can also be submitted by contacting its management team, its director or the chairperson of the Board directly. Reporting can also be done through a trusted colleague of the relevant person. Any person can receive complaints instructions from CB' director or board chairman by telephone or personal contact. Whistle blower cases can be reported via: yourcomplaint@gmail.com or <https://crossingborders.dk/contact-us/>

9.2.2 Dealing with complaints

All complaints procedures result in the opening of a case that will be dealt with by CB. The management and the Board of CB are responsible for dealing with the complaints and reports. For complaints concerning any of these persons, another member of the management or the Board will be appointed to take on the case.

The people in charge assure the registration of the case. At the beginning of the process, the group assesses whether the case requires no further action and can be rejected. In this case, the rejection will be reasoned in brief. The Board must be informed about rejected cases.

The responsible people will then:

- examine and investigate the facts of the case as well as provide the best possible decision-making basis for the inquiries and complaints received in respect of all parties involved.
- ensure that a police report is or has been filed, if the complaint is deemed to be sufficiently serious to fall under the Danish Criminal Code.
- prepare an informative note as a basis for deciding the case when the group considers it sufficiently clarified, and a recommendation of the possible outcome and sanctions.

CB' management will assess the case and decide on the appropriate sanctions that will be imposed. Complaints regarding sanctions or sanctions against the management will be dealt with and decided by the Board.

If necessary, it might be decided that the involved employee will be suspended during the investigation of the case. Similarly, collaborations and contracts with stakeholders and partners might be suspended, while the case is being investigated.

The responsible people will then:

- monitor the process of the case and ensure the necessary follow-up after a decision has been made.
- prepare a final report containing the outcome of the case.
- ensure documentation of reports and complaints and anonymized statistics of all complaints.
- ensure correct storage of cases according to personal data protection law and sufficient anonymization of data for statistics and communication, and ensure that all material in email correspondence with Board members and similar is erased at the relevant parties.

The resources applied for processing the report/complaint should be adapted to the nature and severity of the case.

Exemptions in case processing:

If the report concerns irregularities/corruption reported by an organization itself, the case will be transferred directly to processing according to CB' administration guide and any guidelines from the Ministry of Foreign Affairs of Denmark/Rigsrevisionen - the Danish national audit office/the European Union and guidelines from any other donors.



Involvement of other parties in case processing:

- An employee representative (or a substitute) will always be involved as a dialogue partner in connection with reports/complaints concerning management employees.
- When investigating the case, the complaints group may request anyone at CISU to help provide information.
- In special cases, the group may use the services of an external expert or similar to ensure the best possible decision-making basis.



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