



The Voice of the **Off-Grid Solar Energy** Industry

GOGLA Policies and Code of Conduct

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Introduction

GOGLA seeks to achieve bold and ambitious goals for the industry that it serves. To succeed in these goals, it is imperative that everyone who works for, or with, GOGLA observes high standards of business and personal ethics when conducting their duties and responsibilities. This is also an expectation and requirement from the industry's stakeholders, partners, and funders.

This document contains GOGLA's Code of Conduct, Guidelines for Corporate Social Responsibilities, and other Policies. Together they define the standards of ethical business and personal conduct that apply to GOGLA and its stakeholders¹. The scope of the policies vary; the table in Annex 1 indicates which policies apply to which stakeholders.

- **By applying for, and continuing their GOGLA membership, Members agree to adopt and implement the Code and related Policies.** Violations of the GOGLA policies may result in disciplinary action, including immediate termination of the membership.
- **Representatives agree to adopt and implement the Code and Policies applicable to them by accepting their appointment.** Violations of the GOGLA policies may result in disciplinary action, including immediate termination of the business relationship.
- **Staff and Contractors agree to adopt and implement the Code and Policies applicable to them by accepting and signing an agreement with GOGLA.** Violations of the GOGLA policies may result in disciplinary action, including immediate termination of the business relationship.
- **GOGLA Partners are also expected to adopt these or comparable policies and values to safeguard the reputation of the industry.** Violations of the GOGLA policies may result in disciplinary action, including immediate termination of the business relationship.

The policies in this document have been approved by the GOGLA Board of Directors, with the exception of the Membership Policy which was approved by the GOGLA General Meeting, and a few procedural policies that have been approved by the GOGLA Executive Team. The policies in this document complement and elaborate GOGLA's Statutes. Should there be any conflict between the Statutes and the policies in this document, then the Statutes will prevail.

The policies in this document may be periodically reviewed, amended. All amendments will be approved by the appropriate authorizing body. The latest version of each policy will be published on GOGLA's website.

¹ The stakeholders to which the policies apply are defined in GOGLA's Code of Conduct: Members, Representatives, Staff, Contractors, and others.

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1 GOGLA Code of Conduct

1.1 Introduction

GOGLA seeks to achieve bold and ambitious goals for the industry that it serves. To succeed in these goals, it is imperative that all stakeholders, working for or with GOGLA, observe high standards of business and personal ethics when conducting their duties and responsibilities. GOGLA stakeholders must act with honesty and integrity when fulfilling their responsibilities and always comply with all applicable laws and regulations. This Code articulates the general standards of professional and ethical behavior that GOGLA upholds.

1.2 Scope

This policy applies to all GOGLA Members, Representatives, Staff and Contractors, henceforth referred to as “GOGLA Members and stakeholders”. They apply to all branches and business units of GOGLA Members worldwide.

1.3. Personal and business behavior

GOGLA Members, Representatives, Staff, and Contractors must exhibit personal behavior that reflects positively on themselves, GOGLA and its stakeholders. Good judgement in all personal and business dealings is essential to maintain GOGLA’s reputation and integrity, and that of the industry. Honesty, transparency, and accountability when conducting business is required. Everyone must be treated with respect and dignity. Inappropriate behavior will result in disciplinary action up to and including termination for cause.

GOGLA does not tolerate any form of sexual harassment, discrimination, sexism, intimidation, exploitation, or abuse. Any report of this type of behavior will be taken seriously and will be investigated and handled based on GOGLA’s Safeguarding & Sexual Harassment Policy and will be sanctioned as appropriate.

To ensure a safe working environment it is essential that all GOGLA Members, Representatives, Staff, and Contractors must:

- Comply strictly with all health and safety laws and internal procedures;
- Not engage in illegal or dangerous activities or behavior, such as threats or violence;
- Not possess, distribute or be under the influence of alcohol or drugs, while conducting GOGLA-business; and
- Not carry, distribute or use weapons or firearms of any type while conducting GOGLA business.

Conflicts of Interest, that can affect the ability to perform duties or act objectively and effectively and in the best interests of GOGLA or the industry, must be avoided. GOGLA's interest in any business matter must be placed ahead of any personal interest. Should a Conflict of Interest arise, these should be reported to the GOGLA Board of Directors or Executive Team. GOGLA Representatives, Staff and Contractors shall follow the GOGLA Conflict of Interest Mitigation Policy.

1.4. Compliance with applicable laws, rules, regulation and policies

Knowledge of, and compliance with, the current local laws, rules, regulations and policies applicable to carrying out GOGLA activities is required. In the event a local law, rule or regulation conflicts with this Code, the most stringent will apply. It is strictly prohibited to manifest any behavior or undertake

any form of action that goes against this Code and other GOGLA policies, including GOGLA's *Anti-Bribery and Corruption*, *Anti-Terrorism Financing* and *Anti-Money Laundering* policy.

Furthermore, it is required to be familiar with and respect local culture, structures, beliefs, and customs, as long as these are compliant with international and humanitarian laws and norms and GOGLA policies.

1.5 Avoidance of anti-competitive behavior

- Members should not exchange information that could undermine competition.
- Information to be exchanged shall be limited to the implementation of the GOGLA policies.
- Any sensitive information shall be provided, if necessary, only to an independent third party.
- Every official meeting between GOGLA Members shall have a specific, demonstrable purpose.
- Any other kind of contact between GOGLA Members shall be for legitimate purposes only.

1.6 Protection of assets, resources and data

GOGLA assets, resources and data are to be used for business purposes only and personal use is prohibited. They must be protected against loss, damage, theft, misuse or waste.

Confidential data in GOGLA's possession – whether about GOGLA or external parties – must be protected at all times and must be handled in accordance with GOGLA's *Data and Privacy*, GOGLA's Policy Personal Data Policy and Confidentiality Agreements. Confidential information includes, but is not limited to, members' data, contracts, employees' information, website data, records and other documents in GOGLA's possession, in both hard and soft copy. These are to be destroyed or delivered to GOGLA promptly after the relationship with GOGLA ends or at any time upon GOGLA's request. The obligation to protect this information continues after the relationship with GOGLA ends. Preserving the integrity of this information is vital to GOGLA's business and reputation. It is therefore important to be discrete when discussing GOGLA's business, including in public places or when using phones or email outside the office. Confidential information can only be discussed with authorized GOGLA individuals and documents containing such information should not be left unattended, e.g., in conference rooms or in public places.

GOGLA strives to meet all obligations under data protection laws. All personal data held by or on behalf of GOGLA shall be protected. Personal data includes, but is not limited to, sensitive personal, medical, and financial information. Personal data will only be held by GOGLA for as long as there is a lawful basis for retaining it. All reasonable steps to ensure that personal data is kept confidential and is accessed only by individuals that require this information to carry out their duties must be taken. Third Parties must comply with GOGLA's data protection and privacy policies when personal data is shared with them.

1.7 Communications and media

Access to GOGLA's communication channels, including internet and email, is meant for work related usage only. Personal usage of internet, email, telephone, and all other forms of communication by GOGLA Staff Representatives might be acceptable in certain circumstances provided this is managed appropriately. It is not allowed to visit websites, download material, or send any emails with pornographic, discriminatory, (sexually) intimidating, violent or criminal content. It is prohibited to send any business and/or confidential information to a personal email account or maintain a copy of said information on a personal computers or other non-work electronic devices.

It is prohibited to discuss information about GOGLA, its members, funders & partners, employees, and other business matters on personal social media account platforms, unless an explicit permission has

been granted. In addition, only authorized employees can speak on behalf of GOGLA, including to the media, unless an explicit permission has been granted.

1.8 Reporting a breach

GOGLA Employees, Representatives, Members, Partners, Third Parties and any other individual and/or organization associated with GOGLA have the duty to report any suspected or actual breach of the Code. Any suspicion of misconduct can be reported to the Executive Director or any member of the Board of Directors. A report should include information about (i) the name(s) of the individual(s) against whom the report is being made, (ii) the name of the individual making the report (iii) a description of what was seen and/or said, (iv) the date and location of the event and (v) the names of any witnesses to the event. Witnesses must be informed by the report writer of their inclusion in the report. There will be no retribution or retaliation for a report made in good faith.

Reporting can also be done anonymously [mechanism and process to be defined].

1.9 Consequences of a breach

Any violation of the terms in this Code by GOGLA Employees, Representatives, Members, Partners and Third Parties may be subject to disciplinary action, and in extreme cases to immediate termination of employment/contract and/or a claim for payment of a damage. The same applies to Employees, Representatives, Members, Partners and Third Parties knowing about any past or potential violations and failing to report those, and/or knowingly deceiving and/or obstructing investigations.

The GOGLA Board of Directors shall review any reports of member "non-observance" or failure to observe this Code and other GOGLA policies and rules, and, when appropriate, shall impose proportionate sanctions to be decided by a majority vote of all Board members. Disputes of a commercial or legal nature are outside of the remit of the GOGLA Board of Directors and management and should be handled through the appropriate mechanisms (e.g., law courts).

1.10 List of definitions

Advisory Board: GOGLA's advisory board.

Board of Directors: GOGLA's Board of Directors.

Conflict of interest: a person's private interest interferes – or appears to interfere – with the interests of GOGLA or one of its stakeholders.

Executive Team: GOGLA's Executive Director and Director of Strategy.

Executive Director: GOGLA's Executive Director.

GOGLA's Assets: GOGLA's intellectual property, data, work equipment.

GOGLA Staff: a person who performs or has performed work as part of the GOGLA Team under an employment or consulting contract under civil law or public law appointment for GOGLA.

GOGLA Representatives: individuals who have been formally appointed in role in which they represent GOGLA, including members of the Board of Directors, members of the Advisory Board, Chair and Co-Chairs of GOGLA Working Groups, GOGLA Employees, Consultants and Volunteers.

Contractors: intermediaries, agents, consultants, advisors, distributors, and others acting on behalf of GOGLA, as well as anyone (other than GOGLA Staff) who performs or has performed work for GOGLA.

This policy was approved by the GOGLA Board of Directors on 26 May 2021.

2 GOGLA Guidelines for Corporate Social Responsibility

2.1 Introduction

GOGLA, including all GOGLA Members and other stakeholders, need to take responsibility for the impacts, whether positive and negative, for their operations and activities on society and the environment and should commit to operating responsibly and transparently. The GOGLA's Guidelines for Corporate Social Responsibility ("the Guidelines") act as a compass for GOGLA, its Members and other stakeholders on issues such as working conditions, social and environmental impacts, transparency, and partnerships.

The Guidelines are aligned with GOGLA's values and objectives, as defined in its articles, vision, and mission statements and draw from the most internationally recognized standards, conventions and other instruments. By providing these Guidelines, GOGLA assists the industry in meeting the growing external expectations for responsible business practices, particularly within its value chains. All GOGLA members, by applying for and continuing their GOGLA Membership, are to adopt and implement the Guidelines.

2.2 Scope

The Guidelines apply to all GOGLA Members, Representatives, Staff and Contractors, henceforth referred to as "GOGLA Members and stakeholders". They apply to all branches and business units of GOGLA Members worldwide.

2.3 Basic principles and scope

GOGLA Members and other stakeholders assume social responsibility in corporate management by bearing in mind the consequences of their business decisions and actions on economic, technological, social and environmental levels and bring about an appropriate balance of interests. All GOGLA Members and stakeholders contribute to the well-being and long-term development of a global society and sustainable capital markets.

GOGLA Members and stakeholders will proactively work to ensure that the values mentioned below are put into practice and adhered to both now and in the future. GOGLA Members and stakeholders should also promote adherence to the content of these Guidelines to all their contractual partners.

2.4 Adherence to Laws

GOGLA Members and stakeholders will abide by the laws and other legal requirements of the countries where they are in business. For countries that have a less-developed institutional frameworks, the Members and stakeholders will carefully examine what good business practices should be applied to enable supportive, responsible company management.

2.5 Internationally recognized guidance on sustainable business practice

GOGLA acknowledges the [*OECD Guidelines for Multinational Enterprises*](#) ("OECD Guidelines") as the main internationally recognized reference for sustainable business practice. The OECD Guidelines cover all key areas of business responsibility, including human rights, labor rights, environment, bribery, consumer interests, as well as information disclosure, science and technology, competition, and taxation, and reflect the expectation from governments to businesses on how to act responsibly.

GOGLA strongly recommends its Members and stakeholders to refer, adopt and implement the OECD Guidelines, particularly around best practice on sustainable supply chain management.

GOGLA recommends its Members to also become signatories to the UN Global Compact and incorporate its Ten Principles into their business strategies, policies and procedures as well as into their supply chains. The Ten Principles of the United Nations Global Compact are derived from: the [Universal Declaration of Human Rights](#), the [International Labour Organization's Declaration on Fundamental Principles and Rights at Work](#), the [Rio Declaration on Environment and Development](#), and the [United Nations Convention Against Corruption](#).

2.6 Integrity and Organizational Governance

- GOGLA members and stakeholders gear their activities towards universally held ethical values and principals, especially integrity, honesty, respect of human dignity, openness and non-discrimination based on religion, ideology, gender and ethnicity.
- GOGLA members and stakeholders reject corruption and bribery as stated in the United Nations Convention against Corruption and adheres to its rules.
- GOGLA members and stakeholders commit to free and fair competition. They focus on professional behavior and high standards of quality for work. They foster partnership and trusting interaction with the supervisory authorities.

2.7 Human Rights

GOGLA members and stakeholders are committed to promoting and respecting internationally proclaimed human rights as stated in the *Universal Declaration of Human Rights*, especially those named in the following:

- Protection of privacy.
- Health and Safety: Ensuring health and work safety, especially the guarantee of a safe and health-promoting work environment, avoiding accidents and injuries.
- Harassment: Employee protection against bodily punishment and against physical, sexual, psychological or verbal harassment or abuse.
- Freedom of Conscience: Protection and guarantee of the right to freedom of conscience and freedom of expression.

2.8 Working Conditions

GOGLA members and stakeholders abide by the following core work standards from the International Labour Organization (hereinafter called "ILO").

- Child Labor: The prohibition of child labor, i.e., the employment of persons younger than 15 years old, as long as the local legal requirements do not specify a higher age limit and as long as no exceptions are permitted as laid down in the [Minimum Age Convention, 1973 \(No. 138\)](#) and [the Worst Forms of Child Labour Convention, 1999 \(No. 182\)](#).
- Forced Labor: The prohibition of forced labor of any kind as laid down in [the Forced Labour Convention, 1930 \(No. 29\)](#) and the [Abolition of Forced Labour Convention, 1957 \(No. 105\)](#).
- Wage Compensation: Work standards concerning compensation as laid down in the [Equal Remuneration Convention, 1951 \(No. 100\)](#), especially regarding the level of compensation as stated in the laws and requirements that are in force.
- Employee Rights: Respecting the rights of the employee to freedom of association, freedom of assembly and collective bargaining as laid down in the [Freedom of Association](#)

[and Protection of the Right to Organise Convention, 1948 \(No. 87\)](#) and [the Right to Organise and Collective Bargaining Convention, 1949 \(No. 98\)](#), if this is legally permitted and possible in the respective country.

- Prohibition of Discrimination: Treatment of all employees in a non-discriminatory fashion as laid down in the [Discrimination \(Employment and Occupation\) Convention, 1958 \(No. 111\)](#).

2.9 Hours of Work

GOGLA members and stakeholders abide by work standards concerning the longest permitted time of work as laid down in the [Hours of Work \(Industry\) Convention, 1919 \(No. 1\)](#) and the [Hours of Work \(Commerce and Offices\) Convention, 1930 \(No. 30\)](#) of the ILO.

2.10 Consumer Interests

GOGLA members and stakeholders commit to consumer protection, as well as appropriate sales, marketing and information practices as stated in the [United Nations Guidelines for Consumer Protection](#). Groups that are in special need of protection (e.g., protection of minors) will receive special attention.

GOGLA Members and stakeholders are encouraged to commit to or endorse GOGLA's Consumer Protection Code which is designed to address specific issues and risks around consumer protection related to GOGLA's industry.

2.11 Communication

GOGLA members and stakeholders will openly communicate their compliance with and implementation of these Guidelines among their employees, stakeholders, suppliers and other stakeholders. Every document and all information will be duly produced and properly stored. They will not be unfairly changed or destroyed. Company secrets and partner's business information will be handled sensitively and will be kept in confidence.

2.12 Environmental Protection

GOGLA members and stakeholders fulfill the requirements and the standards for environmental protection that affect their operations and acts in an environmentally conscious way. With regard to natural resources, it abides by the [1992 Rio Declaration on Environment and Development of the United Nations](#).

2.13 Civic Commitment

GOGLA members and stakeholders contribute to the social and economic development of the countries and regions where they are in business and promote appropriate, volunteer activities by their employees.

2.13 Implementation and Application

GOGLA members and stakeholders will make every appropriate and reasonable effort to implement and apply the principles and values described in this Guidelines both now and in the future. Contractual partners will be informed about the basic measures upon request and within the scope of a reciprocal cooperation. No right exists to disseminate operational or business secrets related to competition or any other information that is in need of protection.

This policy was approved by the GOGLA Board of Directors on 26 May 2021.

3 GOGLA Membership Policy

3.1 Introduction

The GOGLA membership policy outlines the rights and responsibilities of GOGLA members and provides guidance for current as well as prospective members. This policy is to be considered in conjunction with the following policies that members must adhere to:

- GOGLA Statutes
- GOGLA Code of Conduct
- GOGLA Guidelines for Corporate Social Responsibility
- GOGLA Anti-Bullying and Sexual Harassment Policy
- GOGLA Anti-Bribery and Corruption, Anti-Terrorism Financing, and Anti-Money Laundering Policy

These documents, together with the applicable by-laws, form the ‘GOGLA rules’. Any violation of the terms of the GOGLA rules will result in disciplinary action, including immediate termination of the GOGLA membership. The GOGLA Board of Directors shall review any reports of member "non-observance" or failure to adhere to the applicable GOGLA policies and rules, and, when appropriate, shall impose proportionate sanctions to be decided by a majority vote of all Board members.

These can be found on the GOGLA website: <http://gogla.org/about-us/gogla-membership-policy>.

3.2 Membership Categories

GOGLA is an inclusive industry association with two member categories: *Industry Member* and *Associate Member* (non-industry member). As the table below shows, the categories give increasing access to, and influence in the industry:

Membership Category	Definition
Industry Member	<p>Legal entities that seek to generate profit and to derive a significant proportion of their income from the sale of off-grid lighting and electricity products or services may be registered as industry members.</p> <p>Organization can qualify as an industry member, if they:</p> <ul style="list-style-type: none"> ✓ Pursue a commercial activity ✓ Are part of the value chain for off-grid lighting and electricity products in at least one of the following areas: supplying of product parts, appliances, or specialized software; manufacturing products; distributing products; importing products; retailing products; providing after sales service for products.

<p>Associated Member (non-industry member)</p>	<p>Organizations and individuals that are directly or indirectly involved in off-grid lighting and electrification and form part of the environment for the sector and adjacent industries, may qualify as associated members. The stated objectives of candidate organizations must be contributing to promotion and development of the off-grid lighting and electrification market and it should logically be in the interest of candidate associate members to see the sector prosper.</p> <p>Associated members may include, but are not limited to:</p> <ul style="list-style-type: none"> ✓ International organizations ✓ Donor organizations ✓ National industry associations ✓ Civil society organizations / NGO ✓ Research centers and universities
	<ul style="list-style-type: none"> ✓ Investors ✓ Test laboratories ✓ Financial service providers ✓ Consultancies ✓ Individuals

GOGLA is the global industry association for the off-grid lighting and electrification industry. “Off-grid lighting and electrification” refers to integrated systems that provide electrical services as stand-alone solutions operating independently, reliably and sustainably. Essential components include: 1) power generation; 2) power storage; 3) power conversion to services; 4) control electronics to manage the system; each sized to enable the full system to function independent from any other power system. To note:

- Contrary to what GOGLA’s name may suggest, this definition does not necessarily require that systems provide lighting as one of its functions. GOGLA aims to gradually expand its services to organizations offering solutions beyond lighting and household electrification. It will do so with caution in order not to lose relevance for its existing member base.
- Systems that rely on an external supply of fuel are not considered to work independently, and thus do not meet this definition.
- Ongoing market developments and growth of GOGLA’s resources and capacities may lead to a review of this focus in the future.

3.3 Member Services

GOGLA members will be entitled to the following GOGLA benefits:

3.3.1 Access to market information and guidance

In addition to market information that GOGLA makes available to all sector stakeholders, GOGLA members will:

- Receive the GOGLA Member Briefing via email (generally, once a week).
- Have access to the member section of the GOGLA website with a range of sector tools, guides and other information resources.
- Have access to GOGLA staff for specific questions.

3.3.2 Access to GOGLA sales data and impact data

GOGLA industry members will be invited to participate in GOGLA's half-yearly sales and impact data collection. Members that participate in this data collection will automatically receive the GOGLA results platform, providing the most granular data as well as comparisons between own company performance and sector developments. Other GOGLA members may be entitled to access the results platform (without own performance comparison) depending on their category; this may involve an additional fee.

3.3.3 Access to events for networking and knowledge exchange

GOGLA organizes various events, alone or jointly with other sector stakeholders. Depending on the nature and objective of the event, participation may be open for all, or restricted.

- GOGLA annual member conference: open to GOGLA members and GOGLA partners only, at no costs.
- Sector conferences: open to all GOGLA members at a fee, and non-members. GOGLA will normally offer GOGLA members a reduced fee where our role in the organization allows us to do so, and invite members for speaking roles first where logically and suitably fitting the agenda.
- Thematic meetings: normally accessible for invited members only, occasionally only for specific segments of the industry. GOGLA members may expect to be invited to such meetings if they are clearly part of the target group, unless the objective of the meeting requires a more restrictive invitation list.

3.3.4 Influencing the agenda for sector discussions

GOGLA actively advocates on behalf of the industry on a range of topics. It also actively promotes, and helps deliver, sector support programmes to help develop the industry. Through GOGLA, members may influence agendas for sector policy and sector support as follows:

- Join GOGLA Working Groups and contribute to discussions, as well as proposing agenda items for GOGLA Working Groups. For specific issues GOGLA may from time to time establish ad-hoc sub-groups with active members, within the framework of a formal Working Group.
- Engage with GOGLA Office team members and/or members of the GOGLA Board of Directors for activities not (yet) covered by any of the Working Group agendas

3.3.5 Receive endorsement as responsible and serious industry stakeholder

- GOGLA members will receive a 'GOGLA member' logo which they may use on their website and other materials, to demonstrate they are GOGLA member and thus seriously committed to contributing to the industry.
- GOGLA members can use the GOGLA newsletter and member briefings to channel company updates (final editorial decisions with GOGLA).
- GOGLA will review the feasibility of company or product labels to help distinguish top performing members/products. If implemented, such labels may be restricted to GOGLA members in certain categories only.

Depending on the membership category, members may be entitled to additional GOGLA services as indicated under 'fee structure' below.

3.4 Member Rights and Duties

3.4.1 General

All GOGLA members shall actively promote the growth of the sector in a sustainable manner. All GOGLA Members:

- Shall abide to the GOGLA rules, including the Code of Conduct and the Corporate Social Responsibility Guidelines;
- Are expected to follow any recommendations applicable to their own organization from GOGLA Industry Opinions, or move towards meeting such recommendations as quickly as reasonably possible.

All GOGLA members have the right to be elected to the Board of Directors. As per AGM resolution (AGM 2014), there will be seven Board positions, of which a minimum of five must qualify for the category “Industry Member”.

Regardless of the membership category, all members have the right and are encouraged to join the various GOGLA working groups. Each working group member is allowed to vote when the working group makes formal decisions (one vote per GOGLA member).

3.4.2 Data reporting

All GOGLA members will be granted access to aggregated market data.

- All industry members are expected to report market data when asked by GOGLA. This includes, but is not limited to, the regular (currently six-monthly) reporting of sales data for all countries of activity and product categories; as well as product specifications of relevance used for the reporting of social impact. In turn, industry members who contribute market data will obtain access to data at the most detailed level available (on a level that does not allow to extract sensitive data of individual companies). GOGLA shall treat member data prudently and with greatest discretion, and only collect data that has been agreed upon in one of GOGLA’s Working Groups.
- Associate members may be incidentally invited to provide data or views; participation is voluntary.

3.4.3 Quality assurance

All GOGLA members trading in off-grid lighting and electrification products are expected to ensure that their products meet internationally agreed minimum quality standards and that products meet advertised specifications. All GOGLA members are encouraged to demonstrate this through, for example, independent testing or certification.

3.4.4 Membership fees

It is required for all GOGLA members to regularly and timely pay their membership fees in order to be able to access GOGLA’s services and benefits.

Depending on the membership category, members may have additional GOGLA rights and restrictions as indicated under ‘fee structure’ below.

3.5 Fee Structure

GOGLA applies a graded fee structure to allow also smaller companies and organizations to become a member of the association. The following GOGLA membership fees apply:

Industry Members		
Annual Turnover (1)	Annual Membership Fee	Specific rights/limitations
Start-up	USD 750	<ul style="list-style-type: none"> • Founded less than 3 years before application, and turnover < USD 1 million • Eligible for 'start-up' status for max 2 years
Below USD 1 Million	USD 1,500	<ul style="list-style-type: none"> • All normal rights/obligations for industry member
From USD 1 million to USD 5 million	USD 4,000	<ul style="list-style-type: none"> • Preferential placement on GOGLA website • All normal rights/obligations for industry member
From USD 5 million to USD 15 million	USD 7,000	<ul style="list-style-type: none"> • Preferred status for speaking roles at GOGLA events (subject to content/suitability) • Preferential placement on GOGLA website • All normal rights/obligations for industry member
From USD 15 million to USD 30 million	USD 10,000	<ul style="list-style-type: none"> • Engage GOGLA Office for company strategy review (on demand/against costs) • Invitations to closed-door conversations with key decision makers (when applicable) • Preferred status for speaking roles at GOGLA events (subject to content/suitability) • Preferential placement on GOGLA website • All normal rights/obligations for industry member
Above USD 30 million	USD 15,000	<ul style="list-style-type: none"> • Invitation to annual GOGLA Industry Leaders meeting with GOGLA Board of Directors and Advisory Board • Invitations to closed-door conversations with key decision makers (when applicable) • Engage GOGLA Office for company strategy review (on demand/against costs) • Preferred status for speaking roles at GOGLA events (subject to content/suitability) • Preferential placement on GOGLA website • All normal rights/obligations for industry member

Associated Member		
Staff count (2)	Annual Membership Fee	Specific rights/limitations
Individual Member	USD 750	<ul style="list-style-type: none"> • Reserved for individuals not representing an organization • All normal member rights/obligations, not transferable beyond the individual
1-10	USD 2,500	<ul style="list-style-type: none"> • May purchase access to GOGLA 'results platform' for market data • All normal member rights/obligations

10-100 staff members	USD 4,000	<ul style="list-style-type: none"> • May purchase access to GOGLA ‘results platform’ for market data • All normal member rights/obligations
100-500 staff	USD 7,500	<ul style="list-style-type: none"> • May purchase access to GOGLA ‘results platform’ for market data • All normal member rights/obligations
Above 500 staff	USD 15,000	<ul style="list-style-type: none"> • Free access to GOGLA ‘results platform’ for market data on request • All normal member rights/obligations

Notes:

1. For industry members that are part of a group or that focus on more activities than off-grid lighting and electrification alone, the applicable turnover is that of the legal entity which is responsible for commercial activities in off-grid lighting and electrification.
2. The staff count is that of the relevant legal entity responsible for activities in off-grid lighting and electrification or adjacent industries.

Membership payments are due to be paid in full by the subscriber members within 30 days of the date of issuing of the invoice. If not paid on time, membership may be suspended or withdrawn.

To be able to accurately determine the applicable fee, industry members will be requested to report their annual turnover category once a year to GOGLA.

If a member or qualifying applicant is unable to finance the full membership fee, the Executive Director may determine a temporary reduced fee at its discretion.

For existing members, the above fee structure will enter into force on January 1st 2022. For new members, the fee structure will enter into force upon adoption by the 2021 GOGLA AGM.

3.6 Membership application and cancellation procedures

Membership application and cancellation procedures are determined by the GOGLA Statutes, and summarized below.

For applications:

- Interested candidates should fill out the form on GOGLA’s website.
- Information on the candidate will be reviewed by the GOGLA Office; the GOGLA Office may contact the candidate for additional information in case of questions.
- Reviewed applications will be presented to the GOGLA Board of Directors for approval.
- If accepted, the candidate will be informed and provided with a first invoice.
- On receipt of the first payment, the candidate will formally join GOGLA. Starting date will be assumed to be the 1st day of the month following acceptance by the BoD.
- New members will be provided with a GOGLA ‘induction package’ providing them with information on the workings of GOGLA, including these policies.

For cancellations:

- Membership will be automatically renewed per calendar year, unless ended by the member before 1 December of the preceding year.

- A cancellation needs to be submitted in writing (post or email) to the GOGLA Office.

3.7 Disputes

In the case of disputes with other GOGLA members, members should first try resolve it amicably and according to the GOGLA Rules and Code of Conduct. Should this not resolve the dispute, GOGLA's Executive Director can facilitate a dialogue between the parties involved in the dispute.

Disputes of a commercial or legal nature are outside of the remit of the GOGLA Board of Directors and management and should be handled through the appropriate mechanisms (e.g., law courts). GOGLA does not provide legal advice or investigate alleged disputes that are not related to a breach of the GOGLA Rules.

This policy was approved by the GOGLA Board of Directors on 26 May 2021 and adopted by GOGLA Members on [date].

4 GOGLA Anti-Bullying and Harassment Policy

4.1 Introduction

This policy sets out GOGLA's approach to preventing and addressing harassment, including sexual and gender-based violence and harassment, including sexism, in the workplace. This policy, which is aligned with the 2019 ILO Convention 190 on Violence and Harassment², outlines GOGLA's commitments to prevent incidents and to ensure effective action is taken when problems occur; the procedures for reporting and responding to complaints; and policy implementation.

4.2 Scope

This policy applies to all GOGLA Members, Representatives, Staff and Contractors, henceforth referred to as "GOGLA Members and stakeholders". Anyone, including employees of GOGLA members, clients, customers, casual workers, and contractors who harasses any other person while participating in a GOGLA activity, or event or visiting the GOGLA workplace may be reprimanded in accordance with this policy.

4.3 Policy Statement

GOGLA operates a zero-tolerance policy for any form of violence and/or harassment in the workplace, including any form of sexual or gender-based harassment including sexist behavior.

GOGLA will treat all incidents seriously and will promptly investigate all allegations and take appropriate disciplinary measures. Any person who is subject to this policy and who is found to have harassed, committed violence or discriminated against another will face disciplinary action, up to and including immediate dismissal from employment. All complaints of discrimination, violence or harassment will be taken seriously and treated with respect and in confidence. No one will be victimised or retaliated against for making such a complaint.

4.4 GOGLA commitments

Safe Organisational Culture

GOGLA strives to create and provide a safe organisational culture for its employees and other individuals representing or acting on behalf of the organization (irrespective of their contractual status), or for individuals who participate in GOGLA activities in any other form. All these individuals should be free from any form of violence or harassment at GOGLA workplaces including sexual and gender-based violence and harassment, including sexist behavior. GOGLA commits to implementing prevention and response mechanisms that support the victims and holds those responsible to account.

Reporting

GOGLA commits to provide multiple channels for GOGLA staff, related personnel, beneficiaries, and any others to safely report violence or harassment, including sexual harassment. GOGLA commits to provide everyone who works for and on behalf of GOGLA with information about how to access these safe reporting channels. It does not matter how much time has passed between the occurrence and when the incident is reported.

² https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C190

Responding

GOGLA commits to responding in a professional and timely manner to all concerns or allegations of sexual harassment, exploitation or abuse. All concerns or allegations should always be taken seriously and investigated and acted upon where appropriate.

Implementation of this policy

GOGLA will ensure that this policy is widely disseminated. It will be made available on the GOGLA website. It will also be included in the staff handbook, and all new employees will be made aware of the content of this policy as part of their induction. It is the responsibility of every manager to ensure that all their employees are aware of the policy.

Complaint procedures

Anyone who is subjected to, or witnesses, harassment should, if possible, inform the alleged harasser that the conduct is unwanted and unwelcome. GOGLA recognizes that calling out harassment in any situation is usually difficult and cannot be expected, particularly when the harassment occurs in unequal relationships (i.e., between a supervisor and their employee).

A victim or bystander can file a complaint against a harasser (irrespective of whether they have approached the harasser directly) with one of the following GOGLA representatives (or multiple in case the first contact did not address the complaint adequately):

- Any member of the management team. The MT member should report the complaint to the Executive Director to jointly determine appropriate steps for investigation and response, unless the complaint concerns the Executive Director in which case the matter should be reported to the Chair or Vice-Chair of the Board of Directors.
- Any member of the Board of Directors. The member of the GOGLA Board of Directors should report the complaint to the Executive Director to jointly determine appropriate steps for investigation and response, unless the complaint concerns the Executive Director in which case the GOGLA Board of Directors should investigate and respond to the claim themselves.
- One of the two GOGLA confidants. Acknowledging that hierarchy may create extra barriers and that there could be a need to support victims in making complaints, GOGLA has appointed two confidants. The confidants are two GOGLA employees who have been nominated by the GOGLA team. Their names and contact details are listed in section 1.7. of this Policy. The confidants should follow the procedure as described below.
- The external confidant, as described below.
- Anonymously [Mechanism and process to be defined]

When a GOGLA person (MT, member of the GOGLA Board of Directors or confidant) receives a complaint of harassment, they will:

- Provide initial support to the victims of harassment.
- Inform victims about informal and formal procedures, ensuring that the victim understands the company's procedures for dealing with the complaint.
- Support/assist the victim during informal solutions or formal procedures.
- Ensure the protection of privacy and confidentiality, to the extent possible and appropriate, and keep a confidential record of all discussions. In doing so, the confidant must also take measures to ensure that privacy and confidentiality are not misused.
- Ensure that victims have the right to remove themselves from a work situation which they have reasonable justification to believe that presents an imminent and serious danger to

safety due to sexual violence or harassment, without suffering retaliation or other undue consequences, and the duty to inform management.

- Respect the choice of the victim.
- Provide after-care to check whether the situation has been improved and whether the victim needs professional help (e.g., to overcome a traumatic event).

Formal complaints mechanism

The GOGLA designated representative who initially received the complaint will refer the matter to an external Confidant to instigate a formal investigation. The external confidant will deal with the matter in accordance with this policy and will:

- Interview the victim and/or by-stander and the alleged harasser separately.
- Interview other relevant third parties separately.
- Conclude whether the incident(s) of harassment took place.
- Produce a report detailing the investigations, findings, and any recommendations.
- If the harassment took place, consult with the victim as to the remedies that are considered appropriate.
- If the harassment took place, publish a written advice to the Executive Director with recommendations for measures to be taken by the Executive Director. If the complaint concerns the Executive Director, the external confidant will address the written advice to the Chair or Vice-Chair of the Board of Directors.
- Follow up to ensure that the recommendations are implemented, that the behavior stopped, and that the victim is satisfied with the outcome.
- If it cannot be determined that the harassment took place, they may still make recommendations to ensure proper functioning of the workplace.
- Keep a record of all actions taken.
- Ensure the protection of privacy and confidentiality, to the extent possible and appropriate, and ensure that all records concerning the matter are kept confidential.
- Ensure that the process is done as quickly as possible and in any event within ten weeks of the complaint being made.

Informal complaints mechanism

The victim can also choose to resolve the matter informally. In that case, the GOGLA confidant will:

- Give an opportunity to the alleged harasser to respond to the complaint.
- Ensure that the alleged harasser understands the complaints mechanism.
- Where the victim agrees, facilitate discussion between both parties to achieve an acceptable informal resolution, or refer the matter to one of the two GOGLA confidants to resolve the matter.
- Ensure the protection of privacy and confidentiality, to the extent possible and appropriate, and ensure that a confidential record is kept of what happened.
- Follow up after the outcome of the complaints mechanism to ensure that the behavior has stopped.
- Ensure that the above is done speedily and within 30 days of the complaint being made, unless the gravity of the situation implies that more time is required.

A victim who chooses to use the informal complaints mechanism can always opt to also use the formal procedure afterwards.

Outside complaints mechanisms

The victim, or the bystander, can also choose to make a complaint outside of the company, by reporting the harassment to the police and/or victim support organizations such as *Slachtofferhulp Nederland*.

4.5 Sanctions and disciplinary measures

Anyone who has been found to have harassed another person under the terms of this policy is liable to sanctions (such as the obligation undergo an anti-harassment training course, a verbal or written warning, adverse performance evaluation, suspension, dismissal, exclusion from future GOGLA activities). Further, to the extent possible and available, (additional) remedies may be made available for the benefit of the victim (such as a change in working arrangements).

The nature of the sanctions will depend on the gravity and extent of the harassment. Suitable deterrent sanctions will be applied to ensure that incidents of harassment are not treated as trivial. Certain serious cases, including physical violence, may be deemed an urgent cause and result in the immediate dismissal of the harasser.

4.6 Monitoring and evaluation

The GOGLA Executive Director will report the number of informal and formal complaints to the GOGLA BoD/Compensation Committee on an annual basis, providing further details as is required to assess whether GOGLA is acting on its commitments in this policy.

GOGLA will regularly evaluate the effectiveness of this policy in preventing violence and harassment and whether it contributes to creating a safe workplace and adjust the policy if needed.

4.7 Confidants

GOGLA confidants:

Sjef Ketelaars	s.ketelaars@gogla.org	+31683046226
Aletta D’cruz	a.dacruz@gogla.org	+31657617810

External confidant:

[Details to be included]

4.8 Definitions

Violence and harassment: any form of verbal, non-verbal or physical conduct, or threats thereof, that aims at, results in, or is likely to result in physical, psychological, sexual or economic harm, and includes gender-based violence and harassment. This includes conduct that is demeaning, humiliating, threatening or otherwise a violation of dignity.

Sexual harassment: any form of verbal, non-verbal or physical harassment of a sexual nature, or the threat thereof, which has the purpose or effect of violating the dignity of the person that is affected, when creating an intimidating, hostile, degrading, humiliating or offensive environment. Anyone can be a victim of harassment, regardless of their sex or gender and of the sex or gender of the harasser. Sexual harassment may also occur between people of the same sex or gender. What matters is that the sexual conduct is unwanted and unwelcome by the person against whom the conduct is directed.

Gender-based violence and harassment: any violence and harassment directed at persons because of their sex or gender or affecting persons of a particular sex or gender disproportionately and includes

sexual harassment. This includes sexist behavior, conditions, and attitudes that perpetuate stereotypes of social (gender) roles based on one's biological sex.

What constitutes harassment: it can involve one or more incidents and actions and may be physical, verbal or non-verbal. Examples of conduct or behavior that constitute harassment may include, but are not limited to:

Physical conduct:

- Physical violence, including sexual assault.
- Unwelcome physical contact including patting, pinching, stroking, kissing, hugging, fondling, inappropriate touching, or interfering with an employee's ability to move.
- The use of job-related threats or rewards to solicit sexual favours.

Verbal conduct:

- Comments of an overtly personal nature on another person's appearance, age, private life, sexual orientation, etc.
- Sexual, racist or other discriminatory comments, stories and unwanted jokes, including negative comments about personal religious beliefs.
- Sexual advances, including unwanted social invitations for dates or physical intimacy.
- Insults based on, amongst other things, the sex, gender, religion or race of another person.
- The use of patronising sexist comments, condescension or paternalistic remarks, even if not sexual in nature.
- Sending inappropriate images, videos or messages, including sexually explicit messages (by phone, email or otherwise).

Non-verbal conduct:

- Display of (sexually) explicit or suggestive material.
- Sexually suggestive or violent gestures.
- Whistling
- Leering

Workplace: GOGLA premises, co-working places or other, including at social events, business trips, training sessions or conferences organized by or attended on behalf of GOGLA, work-related communications or when commuting to and from work.

This policy was approved by the GOGLA Board of Directors on 26 May 2021.

5. GOGLA Anti-Bribery and Corruption, Anti-Terrorism Financing, and Anti-Money Laundering Policy

5.1 Introduction

GOGLA is committed to ensuring the highest standards of Anti-Bribery and Corruption, Anti-Terrorism Financing, and Anti-Money Laundering Policy, and other punishable acts.

GOGLA is operating within existing Dutch and international legal frameworks, and is committed to complying with relevant applicable laws, rules, regulations and ethics standards to affirm its integrity and transparency as stated in the GOGLA Guidelines for Corporate Social Responsibility. This includes the international anti-financial crime framework (e.g., the OECD Anti-Bribery Convention) as well as the applicable European Union's Anti-Money Laundering framework. While GOGLA operates and maintains relationships in countries where terrorism, money laundering, bribery and corruption might be deemed as "business as usual", GOGLA strictly rejects these acts, which are considered serious criminal offences subject to criminalization under the Dutch Criminal Code.

This Policy reflects GOGLA's commitment to be compliant with Dutch and international law and regulations. This Policy elaborates on what is considered as "acceptable" and "unacceptable" behavior from GOGLA Representatives, Third Parties and any other individual and/or organization associated with GOGLA.

5.2 Scope

This Policy applies to GOGLA Representatives, Third Parties and any other individual and/or organization associated with GOGLA.

5.3 Anti-Terrorism (Financing)

GOGLA strictly prohibits GOGLA Representatives, Third Parties and any other individual and/or organization associated with GOGLA from all forms of terrorism. GOGLA will never knowingly support, tolerate and/or encourage terrorism and/or the activities of those who support and/or embrace terrorism. GOGLA will make every effort to ensure that its resources are not used to facilitate or finance terrorist activity. This Policy sets out GOGLA's commitment to implement best practices and be compliant with the Anti-Terrorism Financing framework according to Dutch and European law and regulations. Furthermore, this Policy sets out for GOGLA Representatives, Third Parties and any other individual and/or organization associated with GOGLA how to mitigate and/or respond to the risk of dealing with individuals and/or organizations associated with terrorism.

GOGLA Representatives, Third Parties and any other individual and/or organization associated with GOGLA must comply with the Anti-Terrorism Financing laws of the countries where GOGLA operates and does business. GOGLA Representatives, Third Parties and any other individual and/or organization associated with GOGLA are responsible for the following:

- You must know the identity, credentials and good standing of individuals and/or entities associated with GOGLA (e.g., what they do, where they operate, who their key decision makers and staff are).
- You will confirm the identity, credentials and good standing of individuals and/or entities associated with GOGLA and will check that these individuals or entities are not on lists maintained

by relevant governmental authorities. Confirmation of exclusion from governmental lists must be tracked and maintained for record keeping purposes. You will not knowingly remit any funds to individuals or entities that are known to be linked to, or suspected to be linked to any form of terrorism.

- You will take care to only transmit funds from GOGLA using reputable banks and other financial institutions for this purpose.

GOGLA Representatives, Third Parties and any other individual and/or organization associated with GOGLA must report all potential suspicions of possible links to terrorism to their manager, respectively their contact person at GOGLA. If a GOGLA Representative or a Third Party has no manager/contact person, is not comfortable speaking with their manager/contact person, or is not satisfied with their manager's/contact person's response, they are encouraged to speak with the Executive Director and/or an MT member, or a member of the Board of Directors where appropriate. Managers are required to notify the Executive Director and/or an MT member of a report to them. Contact persons at GOGLA of Third Parties are required to notify their manager of the report to them by a Third Party. GOGLA also has a Whistleblowing Policy in place that enables GOGLA Representatives, Third Parties and any other individual and/or organization to report misconduct.

5.4 Anti-Money Laundering

GOGLA strictly prohibits GOGLA Representatives, Third Parties and any other individual and/or organization associated with GOGLA (having any involvement with) all forms of Money Laundering. All companies, as well as GOGLA, are at risk of being used for Money Laundering. GOGLA takes risk-mitigating measures to prevent this from happening and is on its guard to protect its good reputation in this regard.

GOGLA Representatives, Third Parties and any other individual and/or organization associated with GOGLA must comply with the Anti-Money Laundering laws of the countries where GOGLA operates. Furthermore, they are responsible for the following:

- Must not knowingly deal with criminals, suspected criminals or the proceeds of crime.
- Should not accept large cash payments.
- Must follow any due diligence requirement specified by GOGLA so that GOGLA knows who it is doing business with.
- Must ensure that your business transactions on behalf of GOGLA do not involve acquiring, using or holding monetary proceeds or property acquired with the proceeds of crime.
- Must not hide the origin or nature of criminal property.
- Must not facilitate the acquiring, ownership or control of criminal property.

GOGLA Representatives, Third Parties and any other individual and/or organization associated with GOGLA must report all potential suspicions of Money Laundering to their manager, respectively their contact person at GOGLA. If a GOGLA Representative or a Third Party has no manager/contact person, is not comfortable speaking with their manager/contact person or is not satisfied with their manager's/contact person's response, they are encouraged to speak with the Executive Director and/or an MT member, or a member of the Board of Directors if involving the member of the Board of Directors would be appropriate. Managers are required to notify the Executive Director and/or an MT member of a report to them. Contact persons at GOGLA of Third Parties are required to notify their manager of the report to them by a Third Party.

GOGLA also has a Whistleblowing Policy in place that enables GOGLA Representatives, Third Parties and any other individual and/or organization to report misconduct.

5.5 No Violation of International Sanctions

GOGLA strictly prohibits GOGLA Representatives, Third Parties and any other individual and/or organization associated with GOGLA from violating the (international) sanctions and/or sanction regulations of the countries where GOGLA operates and does business, and/or from violating the (international) sanctions and/or sanction regulations that are applicable to GOGLA, its Representatives, Third Parties and any other individual and/or organization associated with GOGLA in any other way.

Sanctions, also known as trade restrictions and embargo's, are imposed in the interests of maintaining or restoring international peace and security and promoting the international legal order. The United Nations (UN) and the European Union (EU) impose international sanctions. They do this against countries, organizations, companies and individuals. The EU adopts an international sanction after the UN Security Council has passed a resolution to that effect, but also imposes its own sanctions.

The European sanctions are included in European regulations that have a direct effect in the EU Member States. The material restrictions contained in European regulations often focus on specific parties, goods or services, industries or projects, geographical areas, or a combination of these. To protect the objectives of the sanctions, it is prohibited to participate, knowingly and intentionally, in activities the object or effect of which is to circumvent the prohibitions in the sanctions.

The (international) sanctions are applicable in the Netherlands on the basis of the Sanctions Act (*Sanctiewet 1977*) and underlying regulations. As the European regulations do not contain provisions on the supervision and enforcement of the rules and the punishment of violations, the criminal offenses are included in the Sanctions Act and underlying regulations, with reference to the provisions in the European regulations. The restrictions arising from the European regulations are applicable to everyone (both natural persons, and legal persons) through the Sanctions Act and the underlying regulations. This means that GOGLA as well as GOGLA Representatives, Third Parties and any other individual and/or organization associated with GOGLA must always comply with the sanction regulations.

5.6 Anti-Bribery and -Corruption (ABC)

GOGLA insists on honesty, integrity and fairness in all aspects of its business and expects the same in its relationships with all those with whom GOGLA does business. GOGLA strictly prohibits Bribery and/or any form of Corruption. GOGLA Representatives, Third Parties and any other individual and/or organization associated with GOGLA are strictly prohibited from having any involvement in acts of Bribery and/or Corruption. Facilitation payments are also considered as bribes and must not be made.

GOGLA Representatives, Third Parties and any other individual and/or organization associated with GOGLA must comply with the anti-Bribery and Corruption laws of the countries where GOGLA operates and does business (e.g. the Dutch Criminal Code, the UK Bribery Act and FCPA). In addition to the prohibition from having any involvement in acts of Bribery or Corruption, they are responsible for the following:

- Must not offer, pay, make, seek or accept a personal payment, gift or favor in return for favorable treatment or to gain a business advantage. You must not allow anybody else to do so on your behalf.
- Must not make Facilitation payments.
- Know who they are doing business with by conducting the appropriate due diligence as set out in Due Diligence Downstream Partners Policy.
- Not offer, provide, promise to give or negotiate about any payment, gift, hospitality, favor or advantage to Public officials and foreign Public officials aimed at improperly influencing standard procedures or business performance. Dealing with Public officials poses a greater Bribery risk so you must follow the mandatory requirements in this Policy. It is important to recognize that public officials are often subject to rules and restrictions that do not apply to persons who operate in the private sector.
- Turning a blind eye to suspicions of Bribery and Corruption can result in criminal and civil liability for GOGLA and/or GOGLA Representatives.

GOGLA Representatives, Third Parties and any other individual and/or organization associated with GOGLA must avoid conflicts of interest between their private activities and the performance of their activities within the business operations of GOGLA.

GOGLA Representatives, Third Parties and any other individual and/or organization associated with GOGLA must report all potential suspicions of Bribery, Corruption or conflicts of interests to their manager, respectively their contact person at GOGLA. If a GOGLA Representative or a Third Party has no manager/contact person, is not comfortable speaking with their manager/contact person, or is not satisfied with their manager's/contact person's response, they are encouraged to speak with the Executive Director and/or an MT member, or a member of the Board of Directors, when appropriate. Managers are required to notify the Executive Director and/or an MT member of a report to them. Contact persons at GOGLA of Third Parties are required to notify their manager of the report to them by a Third Party.

GOGLA also has a Whistleblowing Policy in place that enables GOGLA Representatives, Third Parties and any other individual and/or organization to report misconduct.

5.6 Gifts, hospitality, entertainment and sponsorships

GOGLA permits the giving and/or receiving of small gift items with a value that is appropriate for the situation, in conformity with local standards and at least below EUR 50 (e.g. promotional items, chocolates, flowers). GOGLA also permits appropriate and hosted entertainment and hospitality for a value that is appropriate for the situation, in conformity with local standards and at least below EUR 150 per occasion (e.g. events, lunch, dinner), for the purpose of promoting good business relations, marking special occasions and maintaining a good image and reputation. This may, however, not happen for securing any personal advantage. It has to be assessed in the context of prevailing customs and prices in the given situation.

The frequency and value of the gifts, hospitality and/or entertainment should not raise the appearance of impropriety and, both individually and cumulatively, must be always reasonable in amount. Moreover, it must not be intended to influence the recipient's decision making and must not violate applicable laws and regulations.

Sponsorships are acceptable and wished for, as long as those are rooted in clear, strict and transparent contracts linked to key deliverables and as long as they are not placed or received to inappropriately influence business outcomes or win business deals.

Prior approval from the Executive Director or Director of Strategy is required for signing sponsorship agreements, as per GOGLA's signatory approval procedure.

5.7 Reporting

As stated, GOGLA Representatives, Third Parties and any other individual and/or organization associated with GOGLA must report all potential suspicions of possible links to terrorism, Money Laundering, (international) sanction violations, Bribery, Corruption or conflicts of interests to their manager, respectively their contact person at GOGLA. If a GOGLA Representative or a Third Party has no manager/contact person, is not comfortable speaking with their manager/contact person, or is not satisfied with their manager's/contact person's response, they are encouraged to speak with the Executive Director and/or an MT member, or a member of the Board of Directors, when appropriate. Managers are required to notify the Executive Director and/or and MT member of a report to them. Third Parties' GOGLA contact persons are required to notify their manager of the report to them by a Third Party.

GOGLA also has a Whistleblowing Policy in place that enables its Representatives, Third Parties and any other individual and/or organization to report misconduct.

5.8 Communication

This Policy will be made available on the GOGLA website and will be distributed to all GOGLA Representatives, Third Parties and any other individual and/or organization associated with GOGLA, and reference to it will be made in the respective contract/agreement that will be signed for by both parties. In case of comprehension issues, the respective person is required to contact GOGLA.

5.9 Internal Controls, Monitoring and Revisions

GOGLA assures that its books, records and accounts are maintained correctly and accurately at all times reflecting every transaction, invoice and document, to facilitate compliance with this Policy and increase transparency. GOGLA's Financial Controller reports the status of GOGLA's financial accounts to the Executive Director annually, with technical support of an external Accounting firm. GOGLA's Board of Directors' Treasurer and the Financial Committee acting on behalf of the Annual General Meeting of GOGLA will review the annual financial report, advise the Executive Director on accounting procedures, and confirm that control procedures are properly maintained.

This Policy as well as all related procedures and systems of GOGLA will be reviewed annually to assess its content and effectiveness. If applicable, this Policy may be subject to amendments at any time.

5.10 Complementary GOGLA Policies

This Policy is complementary to the GOGLA Guidelines of Corporate Sustainability Responsibility (CSR) and serves as an elaboration of these guidelines. This Policy is furthermore complementary to all other existing GOGLA policies and does not interfere with any of their contents.

5.11 Disciplinary actions

Any violation of the terms in this Policy by GOGLA Representatives, Third Parties and any other individual and/or organization associated with GOGLA may be subject to disciplinary action, and in extreme cases to immediate termination of employment/contract and/or a claim for payment of a damage. The same applies to GOGLA Representatives, Third Parties and any other individual and/or organizations associated with GOGLA knowing about any past or potential violations and failing to report those, and/or knowingly deceiving and/or obstructing investigations.

5.12 In case of doubt

It is important to keep in mind to adhere to GOGLA’s principles of honesty and integrity. When in doubt the matter should be discussed with the manager, the Executive Director or the Director of Strategy or a member of the Board of Directors, when appropriate.

Executive Director	Koen Peters	k.peters@gogla.org	06-33988898
Director of Strategy	Chiara Ferracioli	c.ferracioli@gogla.org	06-22500992

5.13 List of definitions

Bribery: means giving, promising, offering, soliciting, or receiving (or attempting to give, promise, offer, solicit, or receive) an improper Benefit for the purpose of influencing the behavior of someone to obtain or retain a commercial advantage.

Corruption: the misapplication of entrusted power for private gain and benefitting private relationships.

Facilitation payments: any payment (no matter how small) made to expedite or to secure the performance of a routine governmental action, which is not possible by following the normal official procedures.

GOGLA Representatives: members of the Board of Directors, members of the Advisory Board, GOGLA Employees and volunteers of GOGLA.

Money laundering: money laundering occurs when a person hides or disguises (i) the actual nature, origin, location, alienation or movement of an object (such as money), (ii) the individual who is entitled to an object or who has the object available, while the person must know or reasonably suspect that the object (in)directly comes from any (of its own) crime(s); or when a person makes use of, acquires, possesses, transfers or converts an object (such as money), while he knows or must reasonable know that the object (in)directly comes from any (of its own) crime(s).

Private person: any person other than a Public Official.

Public official: anyone who performs, has performed or will perform government functions at a national, regional, local, or any other level, including military functions, whether in The Netherlands or abroad, as well as officers, employees, and representatives of public international organizations (for example, the World Bank and the World Trade Organization). As used in this Policy, the term “Public Official” includes not only traditional government officials and those employed by government agencies, departments, or ministries, but also e.g. (a) officers, employees, and representatives of entities owned or controlled by a national, state, or local government; (b) political parties, party

officials, and candidates for political office; (c) individuals contracted (in)directly by a governmental party, and (d) family members of any person listed in this paragraph

Third Parties: intermediaries, agents, consultants, advisors, distributors and others acting on behalf of GOGLA, as well as anyone (other than GOGLA Employees) who performs or has performed work for GOGLA.

Annex:

Transacting with Excluded parties and Terrorism Searches under USAID funded activities

As a USAID-funded grantee, GOGLA is responsible for ensuring that its consultants, staff, vendors, and subcontractors are not listed as ineligible suppliers, organizations and individuals that have been formally excluded, blocked or disbarred from receiving U.S. Government (USG) funds. This ensures that GOGLA does not provide material support or resources to any persons or organizations that are involved in terrorism.

Before purchasing goods and services or hiring staff and consultants with USG funds, GOGLA staff should check the following three sources and document the search results:

- System for Award Management (SAM): A searchable database of individuals, firms and organizations that, for one reason or another, are prohibited from receiving USG funds, even as a supplier. Using this system to check vendors is part of your responsibility under the Terrorism Financing clause in the Special Provisions section (listed under Attachment A - Schedule) of the Cooperative Agreement.
- U.S. Department of Treasury List of Specially Designated Nationals and Blocked Persons.
- United Nations Al-Qaida and Taliban Consolidated List.

If staff, vendors or subcontractors are on these lists then GOGLA may not proceed with hiring, transacting or contracting with these parties. If no matches are found, then the printed page (or screen print) should be kept in our files to document the search. These prints should be available for auditors as and when required.

References

System for Award Management: <http://www.sam.gov>

Executive Order 13224 on Terrorism Financing: <http://www.treasury.gov/resource-center/sanctions/Programs/Documents/terror.pdf>

United Nations Al-Qaida and Taliban Consolidated List:

<http://www.un.org/sc/committees/1267/consolist.shtml>

U.S. Department of Treasury List of Specially Designated Nationals and Blocked Persons:

<https://home.treasury.gov/policy-issues/financial-sanctions/specially-designated-nationals-and-blocked-persons-list-sdn-human-readable-lists>

This policy was approved by the GOGLA Board of Directors on 26 May 2021.

6. GOGLA Safeguarding policy

6.1 Purpose

The purpose of this policy is to protect people, particularly children and at-risk adults, from any harm that may be caused by GOGLA. This includes harm arising from:

- The conduct of staff or personnel associated with GOGLA.
- The design and implementation of GOGLA's programs and activities.

The policy lays out the commitments made by GOGLA and informs staff and associated personnel of their responsibilities in relation to safeguarding. This policy will address the following areas of safeguarding: child safeguarding, adult safeguarding, and protection from sexual exploitation and abuse. These key areas of safeguarding have also different other GOGLA policies and procedures associated with them, namely:

- Code of Conduct
- Anti-Bullying and Harassment policy
- Whistleblowing policy

6.2 Scope

This policy applies to all GOGLA representatives; staff; and contractors.

6.3 Definition of Safeguarding

In the Netherlands, safeguarding means protecting peoples' health, wellbeing, and human rights, and enabling them to live free from harm, abuse, and neglect.

In the development sector, we understand it to mean protecting people, including children and at-risk adults, from harm that arises from coming into contact with our staff or programs.

6.4 Policy Statement

GOGLA believes that everyone we come into contact with, regardless of age, gender identity, disability, sexual orientation or ethnic origin has the right to be protected from all forms of harm, abuse, neglect and exploitation. GOGLA will not tolerate abuse and exploitation by staff or associated personnel.

GOGLA commits to addressing safeguarding throughout its work, through the three pillars of prevention, reporting and response.

6.5 Prevention

To prevent incidents from occurring, GOGLA will:

- Ensure all staff and members have access to, are familiar with, and know their responsibilities within this policy.

- Design and undertake all its programs and activities in a way that protects people from any risk of harm that may arise from their coming into contact with GOGLA. This includes the way in which information about individuals in its programs is gathered and communicated.
- Implement stringent safeguarding procedures when recruiting, managing and deploying staff and associated personnel.
- Ensure staff receive training on safeguarding at a level commensurate with their role in the organization.
- Follow up on reports of safeguarding concerns promptly and according to due process.

GOGLA staff and representatives must not:

(Child safeguarding)

- Engage in sexual activity with anyone under the age of 18.
- Sexually abuse or exploit children.
- Subject a child to physical, emotional or psychological abuse, or neglect.
- Engage in any commercially exploitative activities with children including child labor or trafficking.

(Adult safeguarding)

- Sexually abuse or exploit at risk adults.
- Subject an at-risk adult to physical, emotional or psychological abuse, or neglect.

(Protection from sexual exploitation and abuse)

- Exchange money, employment, goods, or services for sexual activity. This includes any exchange of assistance that is due to beneficiaries of assistance.
- Engage in any sexual relationships with beneficiaries of assistance, since they are based on inherently unequal power dynamics.

Additionally, GOGLA staff, representatives and contractors are obliged to:

- Contribute to creating and maintaining an environment that prevents safeguarding violations and promotes the implementation of the Safeguarding Policy.
- Report any concerns or suspicions regarding safeguarding violations by a GOGLA staff, associated personnel or member to the appropriate staff member.

6.6 Reporting

GOGLA will ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to staff and the communities we work with.

Any staff reporting concerns or complaints through formal whistleblowing channels (or if they request it) will be protected by GOGLA's Whistleblowing Policy. GOGLA will also accept complaints from external sources such as members of the public, partners, and official bodies.

Staff members who have a complaint or concern relating to safeguarding should report it immediately to the Executive Director. If the (staff) member does not feel comfortable reporting to the Executive Director or line manager (for example if they feel that the report will not be taken seriously, or if that person is implicated in the concern) they may report to the Board of Directors.

6.7 Response

GOGLA will follow up safeguarding reports and concerns according to policy and procedure, and according to legal and statutory obligations (see procedures in Associated Policies e.g., Whistleblowing policy).

GOGLA will apply appropriate disciplinary measures to staff found in breach of policy. GOGLA will offer support to survivors of harm caused by staff or associated personnel, regardless of whether a formal internal response is carried out (such as an internal investigation). Decisions regarding support will be led by the survivor.

All incidents of breaches of Safeguarding whether proven or not will be entered into an incident register and disclosed to appropriate stakeholders. The register will note conclusions of all cases so that it is clear what happened and what actions have been taken (if any) or why no action taken.

6.8 Confidentiality

It is essential that confidentiality is maintained at all stages of the process when dealing with safeguarding concerns. Information relating to the concern and subsequent case management should be shared on a need-to-know basis only, and should be kept secure at all times.

6.9 Definitions

Beneficiary of Assistance: Someone who directly receives goods or services from GOGLA's program. Note that misuse of power can also apply to the wider community that the NGO serves, and can include exploitation by giving the perception of being in a position of power.

Child: A person below the age of 18.

Harm: Psychological, physical and any other infringement of an individual's rights.

Psychological harm: Emotional or psychological abuse, including (but not limited to) humiliating and degrading treatment such as bad name calling, constant criticism, belittling, persistent shaming, solitary confinement, and isolation.

This policy was approved by the GOGLA Board of Directors on 26 May 2021.

7. GOGLA Whistleblowing Policy

7.1 Introduction

GOGLA requires its Representatives, Staff and Contractors to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. All Representatives and Third Parties must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations. This Policy is to encourage and protect Representatives and Third Parties who have serious concerns about matters of public interest to come forward.

7.2 Scope

This Policy applies to all GOGLA Representatives, Staff and Contractors.

7.3 Reporting Responsibility

This Policy aims to encourage GOGLA Representatives, Staff and Contractors who have a Suspicion of misconduct to come forward and voice those concerns. It is their responsibility to report any Suspicion of misconduct, including (amongst others) any violations of GOGLA’s Guidelines for Corporate Social Responsibility, and/or suspected violations of law and/or regulations that govern GOGLA’s operations.

7.4 No Retaliation

It is against GOGLA’s values for anyone to retaliate against any GOGLA Representatives, Staff and Contractors who, in good faith, reports a Suspicion of misconduct. Retaliation against a Whistleblower will be subject to disciplinary measures up to and including termination of employment.

7.5 Internal Reporting Procedure

GOGLA has an open-door policy and suggests that GOGLA Representatives, Staff and Contractors can report their suspicion of misconduct to their manager, or their contact person at GOGLA. If a GOGLA Representatives, Staff and Contractors has no manager/contact person, is not comfortable speaking with their manager/contact person, or is not satisfied with their manager’s/contact person's response, they are encouraged to speak with the Executive Director, a member of the Management Team, or a member of the Board of Directors. Managers and other authorized GOGLA representatives are required to report any report of a suspicion of misconduct that was raised with them, in writing to the Executive Director, who will decide on whether or not to open an investigation.

Executive Director	Koen Peters	k.peters@gogla.org	06-33988898
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Should the suspicion of misconduct concern GOGLA’s Executive Director, the manager or other authorized GOGLA representative who received the report will raise the matter in writing with the Chair of the Board of Directors who will decide on whether to open an investigation.

Reporting can also be done anonymously [mechanism and process to be defined].

7.6 Acting in Good Faith

Anyone reporting a Suspicion of misconduct must be acting in good faith and have reasonable grounds for the suspicion. Any allegations that prove not to be substantiated and which prove to have been

made maliciously or knowingly to be false, will be viewed as a serious disciplinary offense and will result in appropriate measures.

7.7 Confidentiality

A Suspicion of misconduct may be reported on a confidential basis by GOGLA Representatives, Staff and Contractors. Reports of a Suspicion of misconduct will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

7.8 Handling of Reported Violations

GOGLA's Executive Director will notify the party who submitted a Suspicion of misconduct and acknowledge receipt of the reported Suspicion of misconduct. It will be promptly decided on whether or not to open an investigation and which appropriate follow up actions will be taken, if any. Should the suspicion of misconduct concern GOGLA's Executive Director, the Chair of the Board of Directors will take these actions.

7.9 External Contact

It is encouraged to first discuss such concerns internally within GOGLA. However, if for any reason, GOGLA Representatives, Staff and Contractors feel unable to raise the matter within GOGLA, or feel that GOGLA did not address their concern, or wish to consult an external party beforehand, they can contact the designated GOGLA external confidant or bring the issue to the attention of the Dutch House for Whistleblowers (www.huisvoorklokkenluiders.nl/onderzoek-naar-een-misstand/verzoek-tot-onderzoek).

7.10 List of definitions

Violence and harassment: any form of verbal, non-verbal or physical conduct, or threats thereof, that aims at, results in, or is likely to result in physical, psychological, sexual or economic harm, and includes gender-based violence and harassment.

GOGLA Representatives: members of the Board of Directors, members of the Advisory Board, GOGLA Employees and volunteers.

Third Parties: intermediaries, agents, consultants, advisors, distributors, and others acting on behalf of GOGLA, as well as anyone (other than GOGLA Employees) who performs or have performed work for GOGLA.

Suspicion of misconduct: the suspicion of a GOGLA Representatives, Staff and Contractors that, within GOGLA, or at another organization if a GOGLA Representatives, Staff and Contractors has come into contact with that organization due to its work for or with GOGLA, there is a misconduct to the extent that:

- the suspicion is based on reasonable grounds arising from the knowledge that the GOGLA Representatives, Staff and Contractors have gained at GOGLA, or from the knowledge that they have gained from working at another company or organization; and

- the social interest is at stake with the violation of a legal provision, a public health hazard, a safety hazard to persons, a danger to the environment, a danger to the proper functioning of the public service or an enterprise as a result of improper conduct or omission.

This policy was approved by the GOGLA Board of Directors on 26 May 2021.

8. GOGLA Drug-Free Workplace Policy

8.1 Introduction

This policy sets out GOGLA's approach to ensuring a drug-free workplace and to addressing any related issues. The policy outlines GOGLA's commitments to prevent incidents and to ensure effective action is taken when problems occur; the procedures for reporting and responding to complaints; and policy implementation.

8.2 Scope

This policy applies to all GOGLA Representatives, Staff and Contractors, irrespective of their contract status and location.

8.3 Policy statement

GOGLA has the responsibility to maintain a safe, healthy and drug-free work environment. Therefore, GOGLA Representatives, Staff and Contractors are prohibited from engaging in the use or misuse of legal or illegal drugs, unauthorized alcohol, or any other substance that impairs one's judgment. It is expected that, as responsible individuals, GOGLA Representatives, Staff and Contractors report to work fit to perform their duties. Any employee who engages in the following activities may be subject to discipline, up to and including termination of employment:

- The use, possession, sale, or solicitation of illegal drugs while on duty, or on company premises;
- Unauthorized use or possession of alcohol or other (legal) drugs that may impair the employee's judgement or fitness to work, or while on duty, on company premises; or
- Reporting to work impaired by alcohol or illegal drugs.

The legal use of prescribed drugs or over-the-counter medications that do not impair an employee's ability to perform the essential job functions effectively and do not endanger the employee or other individuals in the workplace is permitted on the job.

An employee with a drug or alcohol problem may request approval to take unpaid time off to participate in a rehabilitation program. The time off will be granted if the absence will not impose an undue hardship on GOGLA. However, GOGLA may terminate the Representative, Staff and Contractors' employment without providing an opportunity to participate in a rehabilitation program if the employee's current use of alcohol or drugs prohibits the employee from performing his or her duties or endangers his or her health or safety or the health or safety of others.

GOGLA encourages its Representatives, Staff and Contractors' participation in facilitating the maintenance of a drug-free workplace. If an employee suspects a violation of this policy, they should report this to his or her Manager or HR department should the concern involve the employee's Manager. No conduct reprisals, punishment, or retaliatory action will be taken against an employee who registers a concern in good faith. Searching of an employee's personal belongings, desks, lockers, bags or clothes is not allowed by Article 10 of the Dutch Constitution³.

This policy was approved by the GOGLA Board of Directors on 26 May 2021.

³ www.government.nl/binaries/government/documents/reports/2019/02/28/the-constitution-of-the-kingdom-of-the-netherlands/WEB_119406_Grondwet_Koninkrijk_ENG.pdf.

9. GOGLA Disability Policy

9.1 Introduction

GOGLA recognises its responsibilities and legal obligations in ensuring, as far as is reasonably possible, that people with disabilities are afforded equal opportunities with respect to employment and are not discriminated for a reason relating to their disability.

9.2 Scope

This policy applies to GOGLA Staff and Contractors.

9.3 Policy Statement

GOGLA will take reasonable steps to:

- Provide auxiliary aids or services that will assist disabled people to use GOGLA's services;
- Ensure accessibility of GOGLA events;
- Ensure recruitment processes, terms of employment and work environment are not discriminatory on the basis of disability;
- Ensure opportunities offered for promotion, transfer, training or other benefits are the same for all employees.

Every member of the GOGLA team and Contractors are expected, and required, to show consideration towards disabled colleagues, members and relations, and to help implement this policy. GOGLA will not tolerate discrimination on the grounds of disability.

9.4 Definitions

Disability: a difficulty in functioning at the body, person, or societal levels, in one or more life domains, as experienced by an individual with a health condition in interaction with contextual factors.

Persons with disabilities: include those who have long-term physical, mental, intellectual or sensory impairments, which in interaction with various barriers may hinder their full and effective participation in society on an equal basis with others. GOGLA recognizes that persons with disabilities include those whose have a permanent disability and is readily apparent and those whose disabilities are less apparent. Whether or not a permanent disability is readily apparent, any chronic medical condition that may have a repercussion on a person's capacity to work or lead a normal life may require adaptation of the working environment through reasonable accommodation.

This policy was approved by the GOGLA Board of Directors on 26 May 2021.

10. GOGLA Signatory Authority Policy

10.1 Purpose

The purpose of this policy is to specify the signing authorities required (including thresholds for approval) for commitments, contracts and documents being made on behalf of GOGLA towards external parties. It thus contributes to:

- ensuring that actions and decisions are taken by the right individuals at appropriate approval levels, promoting efficient decision-making, as well as effective prevention of errors and/or fraud on the other;
- ensuring that transactions are executed as intended and in accordance with applicable law, regulations and other GOGLA policies;
- helping to maintain fiscal integrity and creating a sound internal control environment.

10.2 Scope

This policy applies to all contracts and documents to which GOGLA is a party and which creates an obligation on the Association, either financial or non-financial, to a third party.

It does not cover internal authorization and control procedures. These are described in separate GOGLA policy documents addressing various internal procedures and functions.

It applies to all GOGLA staff. No person is authorized to sign/approve a document on behalf of GOGLA unless the authority to do so has been formally assigned according to this policy, or through separate explicit delegation, recorded in writing.

10.3 Signatory authority levels

- According to the GOGLA Statutes, the GOGLA Board of Directors (BoD) is elected by GOGLA's Annual General Meeting (AGM) to legally represent the Association in line with its statutes and AGM resolutions. The President or two other members of the Board of Directors are also authorized to represent the Association.
- The GOGLA Board of Directors authorizes the GOGLA Executive Director to legally represent GOGLA, with limitations as indicated in this document.
- The Executive Director may delegate certain responsibilities to the Director Strategy, to Heads of Divisions, or to other GOGLA team members as described below.
- The Executive Director may, with the consent of the GOGLA President, appoint the Director of Strategy to represent him for the purposes in line with this signatory approval policy.

10.3.1 New commitments

This section covers any commitment from GOGLA which creates an obligation for GOGLA, e.g., to pay money or deliver certain services or goods, or intention of collaboration and partnership that may or may not involve financial commitments. This may include (but is not limited to):

- Grant agreements, contracts
- Supply agreements, service agreements
- Partnership agreements or Memoranda of Understanding (MoUs)

- Direct purchases
- Staff contracts and consultancy contracts

The following signing authorization levels apply.

Max. commitment value (excl. specific commitments as listed below):	Min. authorization level	Notes
Max EUR 2,500 (not including travel commitments)	Project/Task manager, within own project/task budget	<ul style="list-style-type: none"> • MT member to approve if outside of project/task budget but within division budget • Executive Director to approve if outside budget
Max EUR 25,000 (including travel commitments)	MT member, within own division budget	<ul style="list-style-type: none"> • Executive Director to approve if outside budget
Max EUR 100,000	ED, within approved GOGLA budget	<ul style="list-style-type: none"> • President of the GOGLA Board of Directors to approve if outside approved budget
Above EUR 100,000	Executive Director following approval by the President of the GOGLA Board of Directors	President of the GOGLA Board of Directors

By authorizing a GOGLA commitment, the authorizing person confirms:

- that the commitment is in line with the approved work plan and budget; if not, that the decision has been adequately justified and approved at the right level according to the table above.
- that GOGLA procurement policy has been followed; if not, that the decision to deviate from the procurement policy has been adequately justified and approved by the Executive Director.
- that the authorizing person is authorized to make the decision.

Furthermore, the authorizing person is responsible for:

- sharing details of all commitments with the Finance team immediately, as well as with the project/task manager.
- ensuring that all commitments are documented and archived in the proper Dropbox folder by the project/task manager responsible for the budget item.

If any of the above points are in doubt, authorization should be sought from the next higher authorization level. The authorizing person may be held personally liable for any costs to GOGLA if the decision was made in obvious breach of these rules and where this breach cannot be reasonably justified.

Specific commitments

- **Membership:**
 - Membership acceptance: approval by Head of Member Services following acceptance by simple majority of BoD.
 - Fee waiver/adjustment or fee cancellation: approval by Head of Member Services, notifying the ED.
 - Membership cancellation by GOGLA: approval by Head of Member Services if related to non-payment of membership fees (notifying the ED, else approval by ED).
 - For all potential contentious decisions relating to membership, decision by ED.
- **Staffing and consultancy contracts:**
 - For staff members on GOGLA payroll: approval/signature by ED, provided the position was included in the approved workplan. Positions beyond the approved staff capacity in the workplan require prior approval from the GOGLA President (or two members of the GOGLA Board of Directors).
 - Consultancy contracts: authorization levels as for other new commitments apply. Individual consultancy positions that involve more than 6 months which were not included in the approved workplan require prior approval from the GOGLA President (or two members of the GOGLA Board of Directors).
- **Commitments with unquantified or undetermined financial commitment**, such as MoUs, assurance letters, partnership agreements: signature in line with authorization levels for financial commitments, based on a fair assessment (by the person giving the authorization) of the potential size of the commitment (in financial or reputational and time commitment terms). Regardless, ET should be made aware of all such agreements or intention to pursue them.
- **Travel on behalf of GOGLA:** approval by MT member (ED for MT members; ED can approve for himself).

10.3.2 Payments

Any invoice, request for payment, expense claim, or other document which needs payment, requires full authorization in line with GOGLA internal control procedures. The Head of Finance and Operations is responsible for all payments in accordance with these procedures and their control from an accounting point of view. He may delegate related tasks to the Financial Controller.

Authorized payments are executed as follows:

- The Financial Controller prepares bank transfer payments and gives 1st authorization.
- The Head of Finance and Operations provide 2nd authorization to execute the payments, for individual payments up to EUR 50,000. For the purpose of payment authorization, multiple payments to one recipient within a 15 day period will count as one payment.
- The Executive Director provides 2nd authorization for any individual payments over EUR 50,000, or for payments up to EUR 50,000 in cases where the Head of Finance and Operations is not available to make a payment on time.

Recurring automatic payments require authorization once only, provided they are clearly non-contentious.

Specific payments:

- Small and incidental expenses may also be paid as follows:

- 1) Credit card: GOGLA credit cards are held by the Executive Director and Head of Finance and Operations (in his/her absence: the Financial Controller) to facilitate payments that cannot easily be made otherwise, e.g. for software services. GOGLA credit cards have also been issued to selected staff members with frequent GOGLA travel and hospitality expenses. All transactions require authorization as for new commitments.
 - 2) Bank card (debit card) payments: Bank cards (debit cards) are held by the Executive Director and by the Financial Controller and can be used for small expenses.
- Transactions between GOGLA bank accounts, including transactions involving currency changes, are not considered to be a new commitment or payment, irrespective of the size of the transaction. They can be approved by either the Executive Director or the Head of Finance and Operations.

10.3.3 Reports and Statements

The following reports and statements require authorization as follows:

- Annual report and annual financial report: President or Vice-President, and Executive Director.
- Tax statements: Executive Director or Head of Finance and Operations. VAT applications can be authorized by the Financial Controller.
- Assurance letters: Executive Director or Head of Finance and Operations.
- Chamber of Commerce registration letters: Executive Director or Head of Finance and Operations.

10.4 Signatures

Evidence of “approval” is to be provided either in writing (original signature), with a digital copy of the signature (on digital version of the document), or approval by email (to be attached to document). All documents are kept both on paper and digital archive (legal regulations apply).

This signatory authority policy is prepared in consultation with the Treasurer of the GOGLA Board of Directors. It will become valid on the date of signing, replacing previous versions of the signatory approval policy with effect from the signing date but not before.

This policy was approved by the GOGLA Board of Directors on 20 December 2020.

Annex 1: Policy per stakeholder - overview

GOGLA Policy	Provides rules for:					Approved by
	Members	Representatives	Staff	Contractors	Others	
1. Values		√	√			Executive Team
2. Code of Conduct	√	√	√	√		Board
3. Guidelines for Corporate Social Responsibility	√	√	√	√		Board
4. Membership Policy	√					Members
5. Anti-bullying and Sexual Harassment Policy	√	√	√	√	Participants in GOGLA activities, Visitors of GOGLA premises	Board
6. Anti-Bribery and Corruption, Anti-Terrorism Financing, and Anti-Money Laundering Policy	√	√	√	√		Board
7. Safeguarding policy		√	√	√		Board
8. Conflict of Interest Mitigation Policy		√	√	√		Executive Team
9. Whistleblowing Policy		√	√	√		Board
10. Gender Representation Policy		√	√	√		Board
11. Drug-free Workplace Policy		√	√	√	Participants in GOGLA activities, Visitors of GOGLA premises	Board
12. Signatory approval policy		√	√			Board
13. Disability Policy			√	√		Board
14. Purchasing Policy			√	√		Executive Team
15. Travel Policy			√	√	Anyone who travels with expenses being paid by GOGLA	Executive Team
16. Data Protection Policy			√			Executive Team