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COAR Safeguarding Policy, version 2.0	1 May 2020	Peter Luskin	N/A
COAR Safeguarding Policy, version 3.0	25 July 2023	Charles Cassimer	Added: “External Feedback and Whistleblowing” section
COAR Safeguarding Policy, version 4.0	8 July 2024	Peter Luskin	Added text specific to BHA EAG requirements
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COAR Safeguarding Policy

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1. Introduction

COAR is an independent social enterprise, registered in Cyprus, that supports the international community to navigate and adapt policy, programs, and projects to emerging and progressively complex, fragile, and high-risk environments. COAR develops conflict-sensitive, sustainable, and adaptable solutions using boutique, real-time, and long-term contextual analysis and research. COAR leverages social media, individual networks, field research teams, and country-specific expertise to gather and translate information into actionable decisions. Based on direct access to affected populations and a deep understanding of their respective political, economic, social, security, and environmental systems and stakeholders, COAR builds a blueprint for humanitarian, stabilization, early recovery, social-cohesion, resilience and development-focused interventions.

2. Purpose

The purpose of this policy is to ensure the protection of vulnerable people in communities where COAR conducts research. The target population to be protected are hereby defined as vulnerable communities and individuals (to include children and at-risk adults) and should be protected from any harm that may be caused due to their coming into contact with COAR. This includes harm arising from:

- The conduct of staff or personnel associated with COAR
- The design and implementation of COAR's research and analytical activities

Of important note, policy-level consequences that arise from COAR's research, such as the suspension of assistance to certain communities or areas, does not fall under the aegis of this policy.

The policy lays out the commitments made by COAR and informs staff and associated personnel of their responsibilities in relation to safeguarding.

This policy does not cover:

- Sexual harassment in the workplace, which is address in COAR's Code of Conduct Policy.
- Safeguarding concerns in the broader community where COAR conducts research but is not directly linked to actions undertaken by COAR and COAR personnel, i.e. airstrikes.

3. What is Safeguarding?

COAR has personnel (staff and consultants) located in several different countries; it is therefore appropriate to ascribe to a general definition of safeguarding as a means of protecting vulnerable peoples' health, wellbeing, and human rights, and enabling them to live free from harm, abuse and neglect. Recognizing that COAR researchers are also based in areas of active conflict, we understand safeguarding to mean protecting vulnerable communities, including children and at-risk adults, from harm that arises from contact with our staff or programs.

3.1. Definitions

Child: COAR uses the United Nations Convention on the Rights of the Child (UNCRC) definition of a child, which is any person under the age of 18, regardless of whether a nation's laws recognise adulthood earlier.

Youth or a young person: is best understood as a period of transition from the dependence of childhood to adulthood independence and awareness of our interdependence as members of a community. The UN defines youth or a young people, as those persons between the ages of 15 and 24 years, without prejudice to other definitions by Member States.

Vulnerable adult: is a person over the age of 18 and who is or may be in need of additional support by reason of mental or other disability, age or illness; and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

3.2. Scope

- All staff and consultants contracted by COAR
- Associated personnel while engaged with work or visits related to COAR, including but not limited to the following: consultants; volunteers; contractors; program visitors including journalists, celebrities and politicians

4. Policy Statement

COAR 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. COAR will not tolerate abuse and exploitation by staff, consultants, or associated personnel. In line with this commitment to the fundamental principles of child safeguarding, adult safeguarding, and protection from sexual exploitation and abuse, COAR's safeguarding policy is built upon three pillars: Prevention, Reporting, and Response.

5. Prevention

5.1. COAR responsibilities

COAR will:

- Ensure all COAR staff and associated personnel have access to, are familiar with, and know their responsibilities within this policy.
- Design and undertake activities in a way that protects people from any risk of harm that may arise from contact with COAR. This includes the way in which information and data - both in relation to individuals, communities, and broader dynamics (political, social, economic, security, etc.) - 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.

5.2. Staff and Consultant Responsibilities

Child safeguarding

COAR staff and associated personnel must not:

- Engage in sexual activity with anyone under the age of 18 (regardless of the local age of majority or age of consent)
- 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 labour or trafficking
- The mistaken belief in the age of a child is not a defense.

Adult safeguarding

COAR staff and associated personnel must not:

- 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

COAR staff and associated personnel must not:

- Exchange money, employment, goods or services for sexual activity as representatives of COAR
- Engage in any sexual relationships with recipients of assistance since they are based on inherently unequal power dynamics. Exemptions will be made in cases where COAR personnel are recruited from affected communities and are themselves (or their partners) already recipients of assistance. In this event, at the time of recruitment, personnel should declare these pre-existing relationships with recipients of assistance to their focal point; the focal point must then inform COAR HR in writing.

Additionally, COAR staff and associated personnel 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 any humanitarian, peacebuilding, or development worker (to include COAR staff members or associated personnel).
- COAR personnel must create and maintain an environment that prevents sexual exploitation and abuse and promotes the implementation of COAR's Code of Conduct. Managers at all levels are responsible for maintaining this environment.

COAR will treat proven allegations of sexual exploitation and abuse as acts of gross misconduct and grounds for immediate termination.

6. Data Collection Methodologies

Field data collection in active conflict zones is inherently challenging and requires COAR to balance personal risk, ethics, best practices associated with data collection and research methodologies, and research objectives.

Underpinning this approach are three principles: 1) informed consent should be gathered from secondary key informants; 2) COAR believes that vulnerable individuals can enrich any research by providing their own unique personal experiences and perspectives; however, COAR also recognizes that the utmost care is required to ensure that the vulnerable people are not exploited. In principle, COAR researchers will refrain from interviewing vulnerable individuals in cases where the interview might increase their vulnerability; 3) researchers are strictly forbidden from physical, emotional, and financial threats and coercion (direct or indirect) while undertaking COAR research and data collection.¹

¹ Of important note, informed consent will be verbally collected, and no physical documentation associated with key informant interviews will be gathered or preserved due to security-related threat.

At the same time, recognizing the sensitivities and cultural texture of the local environment, COAR data collection techniques are tailored based on the researcher's own comfort level and knowledge. COAR's Duty of Care policy ensures researchers are trained and coached to employ different methodologies based on the specific political, cultural, and security context, as well as baseline and ongoing assessments of community dynamics. COAR researchers provide documentation of deliberate and regular physical security threat assessments with respect to the feasibility of data collection, supported by COAR's country-level assessments of relevant local, national, and geopolitical trends.

7. Enabling Reports

COAR will ensure that safe, appropriate, accessible means of reporting safeguarding concerns are made available to COAR personnel and the communities we interact with. Any staff or consultants reporting concerns or complaints through formal whistleblowing channels (or if they request it) will be protected by COAR's Code of Conduct Policy. COAR will also accept complaints from external sources such as members of the public, partners and official bodies.

7.1. Response

COAR will follow up safeguarding reports and concerns according to its policies and procedures, and legal and statutory obligations, and apply appropriate disciplinary measures to staff found in breach of policy.

COAR 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.

COAR will immediately inform clients of any reported or detected safeguarding concern, along with the proposed action plan.

7.2. 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.

7.3. How to Report Safeguarding Concerns

Staff, consultants, and other associated personnel who have a complaint or concern relating to safeguarding should report it immediately to their line manager or organizational point of contact. If a staff member or associated individual does not feel comfortable reporting to their 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 COAR's designated Safeguarding Focal Points:

Frixos Ioannou
HR & Operations Manager
frixos.ioannou@coar-global.org

7.4. External Feedback and Whistleblowing

As part of COAR Global Ltd.'s commitment to maintaining the high standards of professionalism, accountability, and transparency, COAR manages an external feedback mechanism to ensure that voices are heard, shortcomings are addressed, and mistakes are remedied. As COAR's website, COAR encourages feedback, suggestions, and/or complaints through the following email address: admin@coar-global.org.

When emailing COAR, please provide contact information and country of residence, as well as detailed description of your feedback, suggestion, or complaint. Please attach any relevant documents or screenshots that can assist us in understanding and investigating your concern and taking appropriate action. You can expect to receive a response from us within 72 hours, detailing next steps and our internal investigatory process, as well as regular updates regarding outcomes, actions taken, and resolution, when applicable. Led by the HR team and Country Directors, COAR will handle any feedback, whether a suggestion or complaint, with utmost confidentiality. As COAR takes a survivor-centered approach, principles of safeguarding and code of conduct will be adhered to.



Policy Approved by Peter Luskin, COAR Chief Executive Officer

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Code of Conduct

1. Background

COAR's Code of Conduct sets the organization's standards of moral and ethical behavior for both individuals associated with COAR and for the organization as a whole. Individuals are expected to understand and apply the principles and actions within the Code of Conduct. Any breach to the Code of Conduct may result in termination of the individual's contract.

The Code of Conduct serves as a set of guidelines for behavior that should be followed to ensure that COAR lives its principles as an organization. All those associated with COAR share responsibility to adhere to and ensure the organizational code of conduct is upheld at every level.

Violations of COAR's Code of Conduct are taken very seriously, and incidents will be investigated by the Senior Management Team, or an external consultant in the event of a conflict of interest. In the event that allegations are proven, disciplinary action, to include termination, will occur.

Incidents or concerns should be reported immediately to line managers/coordinators, COAR's Chief Operating Officer, Chief Technical Officer or the HR & Operations Manager, Frixos Ioannou (frixos.ioannou@coar-global.org).

COAR's Code of Conduct is available to all team members and for new team members is briefed by their coordinator, or the HR team, as part of their induction. Separately, COAR's HR Team will implement annual or bi-annual refresher sessions for all of COAR team members.

2. Individual Code of Conduct

1. **No Harassment, Bullying, Discrimination or Unfair Treatment.** Individuals working with COAR will not harass, bully or discriminate against others based on gender, nationality, ethnicity, sexual orientation, religion, tribal affiliation, or any other factors. Individuals should treat all individuals with respect and equality.
2. **No Exploitation, Blackmail or Abuse of Power to gain personal favors.** Sexual or other forms of exploitation, including blackmail, or any use of authority to gain personal favors or benefit, including sexual favors or other forms of humiliating, degrading, or exploitative behavior, is prohibited.
3. **No Fraud, No Corruption.** Fraud, whether for personal or financial gain, is strictly forbidden; this applies equally to COAR as an organization and as a representative of COAR when engaging with external organizations. COAR has zero tolerance for corruption, in the form of bribery or other illicit activity. Any instances of fraud, waste, abuse, and aid diversion witnessed by COAR personnel, regardless of donor or

organization, should be reported through existing mechanisms. COAR Senior Leadership is responsible for reporting these allegations to applicable authorities.

4. **No Criminal Behavior.** The laws of host-countries will be respected, and COAR staff will carry themselves in accordance with these laws and principles at all times.
5. **Anti-bribery.** No payments of money or anything of value will be offered, promised or paid, directly or indirectly, to any Officials to influence the acts of such Officials, to induce them to use their influence with a government or an instrumentality thereof, or to obtain an improper advantage in connection with any COAR activity. “Official” means (1) an employee of a government department or agency, whether in the executive, legislative or judicial branches of government, and whether at the federal (national), state, or local level (or their equivalents), whether part-time, unpaid, or acting in an official capacity to carry out government responsibilities; (2) a political party or a political party official; (3) a candidate for political office; (4) an employee of a public international organization such as the World Bank, International Monetary Fund, or the European Union; or (5) an officer or employee of a government-owned company, even if the company is operated like a privately-owned corporation. No payments of money or anything of value will be offered, promised or paid, directly or indirectly, to any other person if the payment would violate Applicable Integrity Laws. “Applicable Integrity Laws” include the U.S. Foreign Corrupt Practices Act 1977 (as amended), UK Bribery Act 2010 (as amended), and any other applicable laws, rules, regulations, decrees and/or official governmental orders relating to anti-corruption, anti-money laundering and anti-tax evasion in relevant jurisdictions.
6. **Neutrality and Non-Engagement in Conflict.** COAR deals with sensitive conflict-related information that often intersects with security and political actors, as well as other parties to that conflict. Individuals working for COAR should not be directly engaged with or closely associated with parties to the conflict. This same principle should -in theory- apply to donors and clients, at least insofar as COAR’s data is used and shared.
7. **Professionalism when representing the organization.** Individuals should conduct themselves in a professional manner when at work or representing COAR in an official function. Individuals should take care not to behave in a manner which negatively impacts the reputation of the organization.
8. **Confidentiality.** Individuals working for COAR may have access to information that could pose a threat to other individuals, organizations, as well as COAR itself; risks include but are not limited to operational, physical security, reputational, and financial risk. Members of COAR should, at all times, treat data and information with the utmost confidence and confidentiality, as detailed in COAR contracts.

9. **Uphold organizational values, mission and policies.** Individuals working for COAR should understand and try to uphold COAR's values, mission and policies in all their dealings with and for the organization.
10. **Conflicts of Interest:** Conflicts of Interest occur when COAR staff or consultants have a direct or indirect interest (personal or financial) in transactions or analytical outcomes. Some Conflicts of Interests - such as those related to personal philosophy or ideology- are accepted with the understanding that COAR, as an organization, does not subscribe to any specific ideology, religious or otherwise. Financial and/or material conflicts of interest are unacceptable.
 - The general rule is that COAR employees and consultants are obligated to avoid and disclose ethical, legal, financial, and/or other conflicts of interest involving COAR, and remove themselves from a position of decision-making authority with respect to any conflict situation.
 - **All positions of influence, financial benefits, financial interests, and other potential conflicts of interest must be disclosed at the time of joining COAR.**
 - COAR consultants and employees may not receive or offer gifts, entertainment or anything else of significant value (e.g. financial payments, awards, loans, services, fees, etc.) for the purpose of influencing the action of COAR or as part of any COAR transactions. Gifts and entertainment (except those generally valued at 100 EUR or less) received from vendors, suppliers, and consultants must be declined.

3. Organizational Code of Conduct

1. **Mitigate Harm.** COAR deals with data and provides analysis related to complex conflict environments, that is provided to a broad array of stakeholders. COAR endeavors to ensure that this information and analysis is not used to cause further physical or economic harm or suffering. At the same time, COAR endeavors to ensure that information and analysis supports the reduction of harm.
2. **Accuracy.** COAR endeavors to provide analysis that accurately reflects the reality on the ground. It should not shy away from expressing truth even if that truth is politically distasteful.
3. **Equal Treatment of Individuals.** Part of COAR's organizational idea is to break down the dichotomy that generally exists in the world of INGOs between expatriate and national staff. COAR strives to create internal systems that treat all individuals equally, regardless of nationality, gender and other factors, and while differences will arise, those should be based on areas such as experience, technical and contextual knowledge, professional skills, etc.
4. **Build from the bottom up.** COAR has a strong belief that humanitarian interventions and international policy should be informed by local realities rather than analytical fantasies. COAR strongly believes in localization as a modality, while acknowledging

the role played by external actors and perspectives. COAR seeks to meld these two approaches in its analysis and organizational character.

5. **Neutral analysis, pro-active operations.** COAR's business model is built around the requirement for neutral and independent analysis. At the same time, COAR actively seeks to work with clients and donors that share its values and vision.
6. **Ends don't justify the means.** COAR believes in process. It does not believe that ends justify means, and thus that dignity, mutual-respect, integrity, and honesty are requisite in all engagements at all times, regardless of eventual outcomes.
7. **Uphold COAR's core values.** As an organization COAR strives to uphold its core values of justice, honesty, integrity, transparency, effectiveness, accuracy, and clarity in all products and activities.
8. **Ensure that COAR's systems, policies and operations reflect both the code of conduct and COAR's values.** It is important that COAR's systems, operations and policies reflect this code of conduct and values. It is relatively easy to write a code of conduct, but it is much more difficult to operationalize it.

COAR will strive to operationalize this code of conduct and its associated values at all times and in all interactions.

Agreement to COAR's Safeguarding and Code of Conduct Policies



Policy Approved by Peter Luskin, COAR Chief Executive Officer

Date: January 2026

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