



Due diligence for responsible business conduct with regards to people, animals, society and the environment

Account reporting year 2023

for Kirkens Nødhjelp



SUSTAINABLE DEVELOPMENT GOALS



To Readers Of The Report

Enterprises and the public sector have a great impact on people, society, the environment, climate, and animals and can both contribute positively to development, or negatively by causing harm. Enterprises therefore hold a central role in achieving UN's Sustainable Development Goals (SDGs) and the Paris Agreement's 1,5-degree target.

This report can be used as an account for the Transparency Act, but it has a broader scope with climate and the environment, circular economy, and anti-corruption indicators also being included. Our members are obligated to carry out due diligence and report annually on their work. Base level1 members also meet the Transparency Act's due diligence duty, and partially the Act's information duty.

Ethical Trade Norway's concept of responsible business conduct equals OECD's terminology and due diligence methodology. This is the systematic effort that enterprises do to identify, prevent, or mitigate adverse impacts and explain how they manage their risks of negative impact, as well as provide remediation to people, animals, society, and the environment where this is required – is called due diligence. Norwegian authorities expect all enterprises, regardless of their size, to carry out due diligence on society, the environment, and animals in accordance with the UN's Guiding Principles for Business and Human Rights (UNGPs) and OECD's Guidelines for Multinational Enterprises. This applies to enterprises, the public sector, and organisations.

Ethical Trade Norway's Declaration of Principles (our Code of Conduct) for Responsible Business Conduct covers the areas of decent work, human rights, environment/climate, anti-corruption, and animal welfare. This report is done in full transparency and in line with UNGPs and OECD's guidelines. The reports of all members are publicly accessible on Ethical Trade Norway's website.

Heidi Furustøl

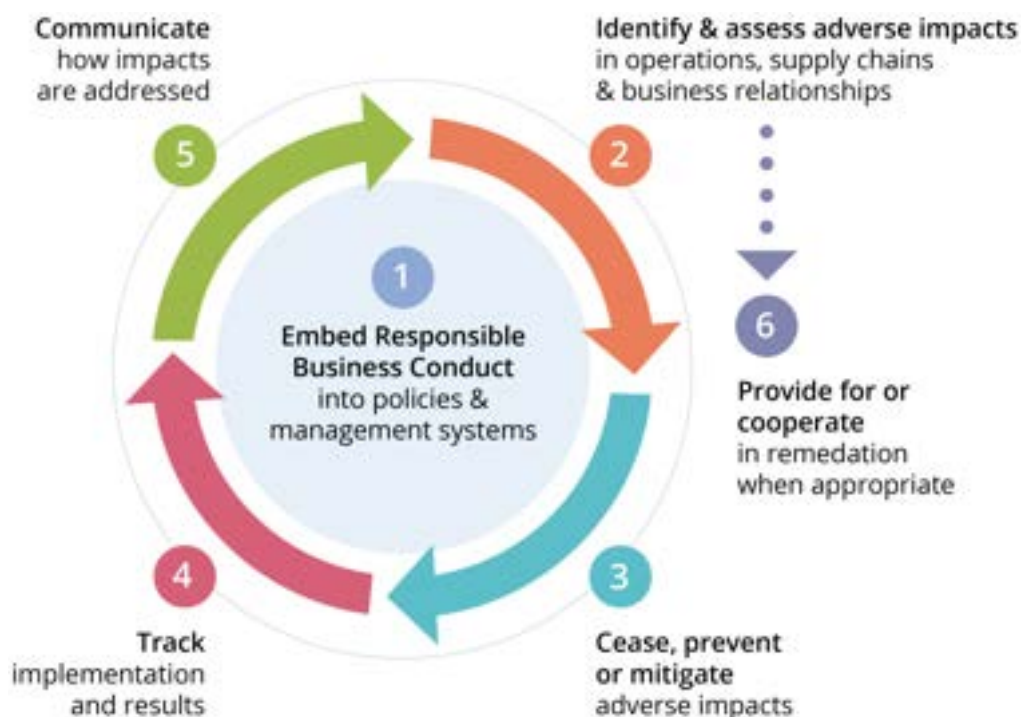
Executive Director

Ethical Trade Norway

Due diligence

This report is based on the UN Guiding Principles on Business and Human Rights and the OECD model for Due Diligence for Responsible Business Conduct.

The model has six steps that describe how companies can work for more responsible and sustainable business practice. However, being good at due diligence does not mean no negative impact on people, planet and the society. It means that the company is open and honest about challenges faced and shows how this is managed in the best possible way in collaboration with its stakeholders. This report is divided in chapters following the OECD model.



Preface From CEO

Norwegian Church Aid works with people and organisations around the world in their struggle to eradicate poverty and injustice. We help those whose needs are greatest, regardless of ethnicity, creed, political or religious affiliation. We work directly or indirectly towards achieving the Sustainable Development Goals 1,2,3,4,5,6,8,10,11,13,15 and 16.

As a certified Core Humanitarian Standard (CHS) organisation, NCA is committed to providing appropriate, relevant, effective and timely assistance to people and communities in situations of crisis and vulnerability, while strengthening local capacities, and enabling complaints through complaints mechanisms.

Human rights and international humanitarian law form the basis for NCA's work, and all our programmes and interventions address rights deficits. NCA applies a Rights-Based Approach (RBA) founded on the principles of participation, accountability, non-discrimination, empowerment, and link to human rights instruments. When rights holders are empowered and mobilised for inclusive and collective action, civil society is better equipped to address the root causes of injustice and inequality and to hold duty-bearers accountable for fulfilling their obligations. In our humanitarian responses, we are guided by humanitarian principles.

In implementing its activities, NCA uses conflict sensitive approaches to ensure our activities do not instigate or intensify conflicts. Humanitarian aid and long-term development cooperation provide external resources to local communities that may feed into existing power relationships or give rise to new ones. Do No Harm is a leading tool for the application of conflict sensitivity. The do no harm principle requires humanitarian and development actors to strive to minimize the harm they may do inadvertently by their presence and by providing assistance and services. It supports efficiency by helping NCA and partners to foresee and prevent unintended negative impacts, so that plans can be implemented more smoothly, and with more support from local communities.

In NCA's Fighting Inequality programme we work with extractive industries. The mining industry in South Africa for example has, over the years, made a fortune extracting minerals, but it has also left communities with many problems. Toxic waste from mining has left soil, water, and air heavily polluted. Communities affected have suffered from health problems but have had little remedy from duty-bearers. NCA works together with partner organisations to document the effects mining has on local communities and to empower rights-holders to engage with and hold local government representatives and mining companies accountable for environmental and human rights.

NCA's work to actively prevent contributing to human rights violations or negative consequences focuses on high-risk procurements and activities that we can influence.

" Together for a just world "



Dagfinn Høybråten
Generalsekretær

Board Signature


Tone Lindheim
Chair of the Board


Vegard Kolbjørnsrud
Deputy chair of the Board


Helborg Finset
Board member


Torstein Tveiten Holten
Board member


Jølle Young
Board member


Birgitte Moe Ølsen
Board member


Kjell Frøheim
Board member


Jørn Lemvik
Board member


Marte Hansen Haugen
Board member


Erik Hjørt Kirkerud
Board member


Silje Margrete Ander
Board member


Anna Strandenes
Board member


Dagfinn Heybråten
General Secretary

Oslo
27.05.2024

Enterprise information and enterprise context

Key enterprise information

Enterprise name

Kirkens Nødhjelp

Head office address

Bernhard Getz Gate 3

Main brands, products and services offered by the enterprise

Emergency assistance in disasters, long-term development in local communities and advocate for just decisions by public authorities, business and religious leaders.

Description of enterprise structure

Norwegian Church Aid is an ecumenical diaconal organization for global justice, operating in 30 different countries, with offices in 20 countries.

Cooperation with approximately 250 local partner organisations is the foundation for NCA's international work and ensures local ownership, sustainability, greater impact, contextual relevance and accountability towards rights holders.

The six thematic areas included in the Programme Framework are:

Gender-based Violence

Climate Resilient Water, Sanitation and Hygiene

Peacebuilding

Faith-based Climate Action

Climate Smart Economic Empowerment

Fighting Inequality

NCA has programmes in the following countries:

Afghanistan

Angola

Democratic Republic of Congo

Eastern Africa (Regional Office in Nairobi)

Ethiopia

Guatemala

Haiti

Iraq

Lebanon

Malawi

Mali

Myanmar

Nigeria

Pakistan

Palestine

Somalia

Southern Africa

South Sudan

Sudan

Syria

Tanzania

Ukraine

Zambia

Dagfinn Høybråten is Secretary General of Norwegian Church Aid, appointed by the Board of Directors.

The Council is the main representative entity of Norwegian Church Aid. The Council approves the organisation's strategy, elects the Board and approves the annual reports and accounts.

Turnover in reporting year (NOK)

1 550 000 000

Number of employees

874

Is the enterprise covered by the Transparency Act?

Yes

Major changes to the enterprise since last and current reporting period

There have not been any major changes since the last reporting period.

Our Global Strategy outlines two main strategic directions for NCA in the coming years:

An increased focus on humanitarian response and a renewed emphasis on faith-based actors as agents of change within the wider civil society.

Contact person for the report (name and title)

Corinna Schüttler-Kvarme, Head of Global Logistics

Email for contact person for the report

corinna.schuttler-kvarme@nca.no

Supply chain information

General description of the enterprise's sourcing model and supply chain

NCA has decentralised logistics systems, implying that NCA Area/Country offices and Head Office Departments are responsible for their own procurement and logistics arrangements. Procurement is regulated by the NCA Procurement Manual and donor requirements. In exceptional circumstances, procurement may also be carried out on behalf of Country Offices or departments in Head Office through NCA Global Logistics Division. This is when availability or procedural requirements limit local procurement or through emergency responses managed by the NCA Head Office.

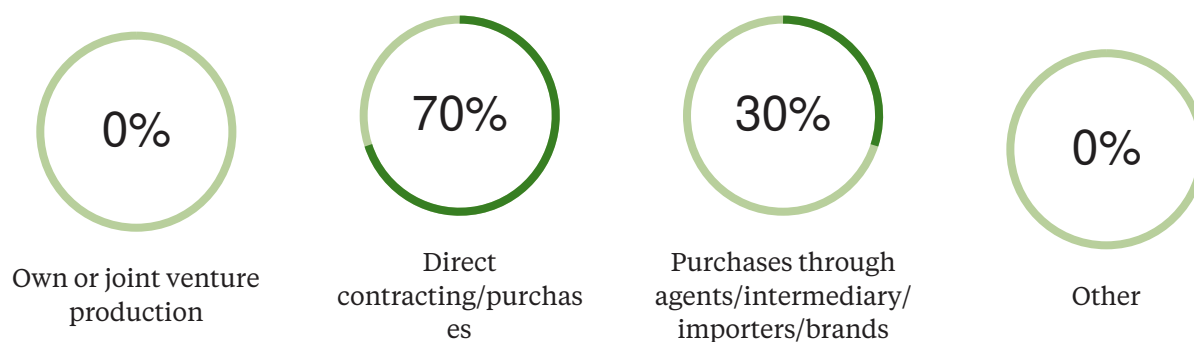
Number of suppliers with which the enterprise has had commercial relations in the reporting year

559

Comments

Being one of the founding members, Norwegian Church Aid renewed its membership in Ethical Trade Norway in 2023. Our Code of Conduct for Contractors will contribute to that our contractors respect and promote fundamental human rights and decent working conditions, which will be monitored where possible by NCA. Our ethical policies include NCA's Accountability Framework, and NCA Protection from Sexual Harassment, Exploitation and Abuse & Child Safeguarding (PSHEA & CS) policy. NCA has zero tolerance for corruption, which is a fundamental principle through our work. With regards to prevention, NCA work with anti-corruption and accountability at every stage of the development chain: head office, country offices and local partners.

Type of purchasing/ suppliers relationships



The above numbers are related to procurements done by our Head Office in Norway. Our financial system does not give information about the number of suppliers in our country offices. This is something we plan to improve. With activity in more than 30 countries, we have relationships with various local, regional and international suppliers and with local partnerorganisations that use their own suppliers. Our international procurements are related to IT systems, computers, consultants, vehicles, insurances, travel and the like. Country Offices do their own procurements. It is an important principle for us to buy as local as possible to support the local communities.

List of first tier suppliers (producers) by country

NCA does not have this information. We prioritize minimizing negative consequences at the local level where we have a greater influence.

State the number of workers at first tier producers that the enterprise has an overview of, and the number of suppliers this overview is based on:

Number of workers

Number of suppliers this overview is based on

Comments to number of workers

Key inputs/raw materials for products or services and associated geographies

IT Equipment	China
Solar panels	China
Bricks	Global
Cement	Global
Construction	Afghanistan Somalia South Sudan
Non-food items	China India
Conference venues	Afghanistan Iraq Pakistan Sudan Somalia South Sudan
Chemicals and fertilizers for agriculture	Global

NCA's main procurements are related to:

Water and sanitation construction including solar installations

Distribution of non-food items like hygiene kits

Irrigation drip kits, seeds and chemicals in our economic empowerment programmes

Venues for trainings, seminars and conferences

Office supplies and IT equipment to run our operations

Is the enterprise a supplier to the public sector?

No

Goals and progress

Process goals and progress for the reporting year

1

Goal: Safety in the workplace

Status: In 2023 we have worked on the development of a new monitoring tool that includes "Safety in the workplace and for the community". The tool is being tested and rolled out in 2024.
In 2022/2023 our Head Office premises were renovated in compliance with the Working Environment Act.

2

Goal: Prevention of sexual harassment, exploitation and abuse

Status: In 2023 we have worked on the development of a new monitoring tool that includes prevention of sexual harassment, exploitation and abuse. The tool is being tested and rolled out in 2024.
Norwegian Church Aid's Protection from Sexual Harassment, Exploitation and Abuse (PSHEA), and Child Safeguarding (CS) policy from 2021 has been implemented throughout the organisation.

3

Goal: Anti-Corruption

Status: 25% of all staff have taken the E-learning "Transparency International E-Learning on "How to prevent corruption in Humanitarian Operations".

4

Goal: Waste avoidance, reuse and recycle

Status: In 2023, trainings on green procurement have been provided to logistics officer and program managers in Country Offices as well as thematic advisors at Head Office.
In 2023, Country Offices in Tanzania, Afghanistan and Mali have implemented waste separation in their facilities and found service providers to handle the different waste fractions.

Goal for coming years

1

Safety in the workplace, low wages & working conditions

Roll out a new partner project monitoring tool where NCA finance, logistics and monitoring & evaluation staff jointly monitor partner projects.

Safety in the workplace and for the community, is a topic to be monitored where relevant.

2

Prevention of sexual harassment, exploitation and abuse

Roll out a new partner project monitoring tool where NCA finance, logistics and monitoring & evaluation staff jointly monitor partner projects.

Sexual harassment, exploitation and abuse is a topic to be monitored where relevant.

3

Anti-Corruption

Attention on learning from previous corruption cases

Institutional training models.

We plan to examine case studies in various forums as an educational tool.

4

Prevention of waste and littering

Deployment of the Nexus Environmental Assessment Tool (NEAT+) as NCA environmental screening tool to avoid, reduce and mitigate negative impacts in projects

Capacity building on green procurement

Development of standard specifications and environmental criteria for relevant products and services

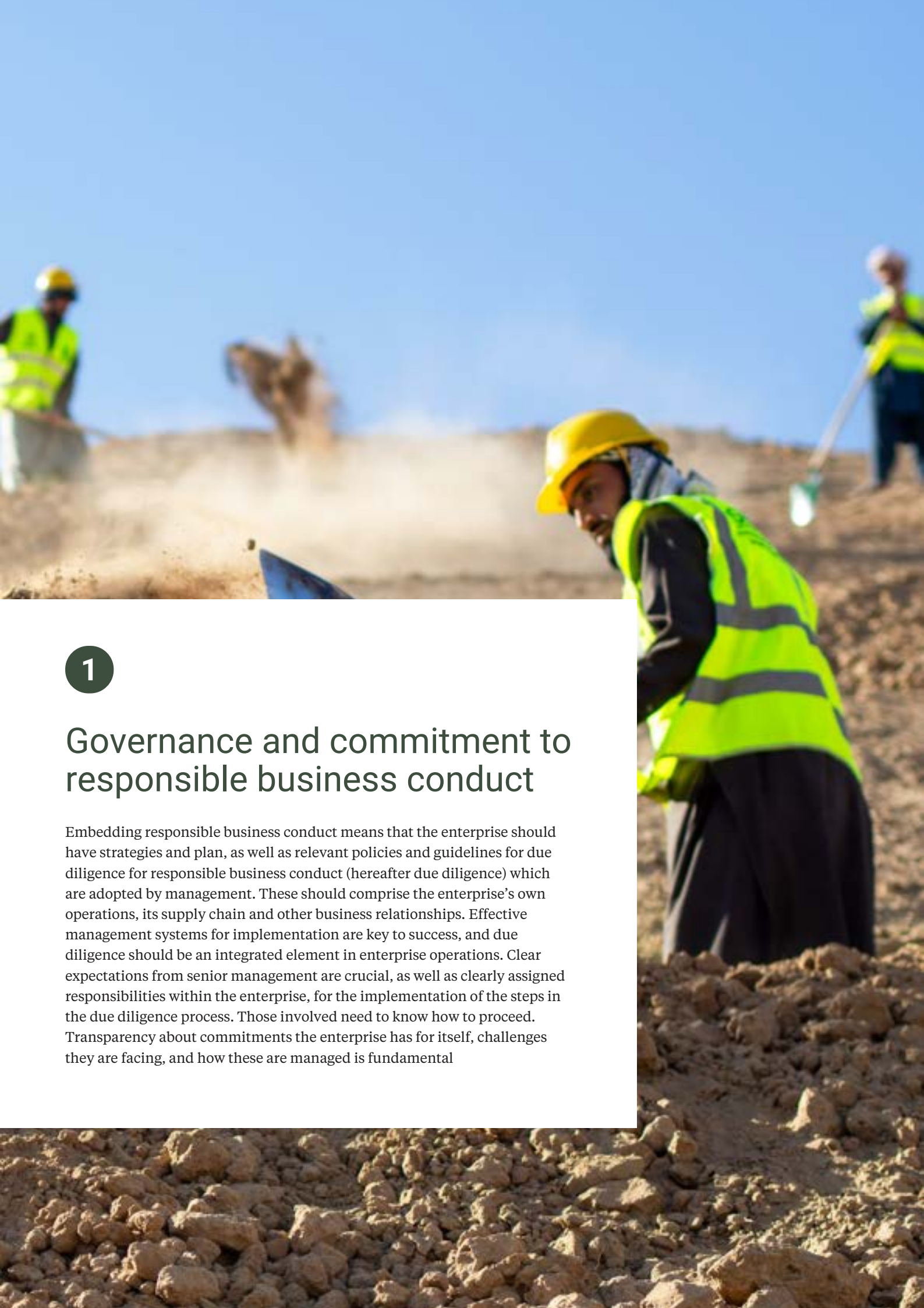
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Greenhouse gas emissions

Continue efforts to reduce energy consumption and transition to renewable energy sources for power generation in NCA Country Offices

Establish NCA base year for carbon accounting

Establish carbon budgets for international air travel



1

Governance and commitment to responsible business conduct

Embedding responsible business conduct means that the enterprise should have strategies and plan, as well as relevant policies and guidelines for due diligence for responsible business conduct (hereafter due diligence) which are adopted by management. These should comprise the enterprise's own operations, its supply chain and other business relationships. Effective management systems for implementation are key to success, and due diligence should be an integrated element in enterprise operations. Clear expectations from senior management are crucial, as well as clearly assigned responsibilities within the enterprise, for the implementation of the steps in the due diligence process. Those involved need to know how to proceed. Transparency about commitments the enterprise has for itself, challenges they are facing, and how these are managed is fundamental

1.A Policy for own enterprise

1.A.1 Link to publicly accessible policy for own enterprise

<https://www.kirkensnodhjelp.no/en/about-nca/accountability/>

1.A.2 What does the enterprise say publicly about its commitments to respect people, animals, society, the environment and climate?

See policy above.

1.A.3 How has the policy/commitment been developed and how is it embedded in the enterprise?

The policy was developed by Global Logistics mainly based on NCA's existing policies, Code of Conduct and other key documents that relate to responsible business conduct. The policy was presented and discussed with all Country Directors and all managers in Norwegian Church Aids Head Office.

1.B Organisation and internal communication

1.B.1 How is the due diligence work organised within the enterprise, embedded in internal guidelines and routines, and why?

Norwegian Church Aid's Quality & Accountability framework states our commitments to rights-holders, host communities, partners and other stakeholders. The framework also outlines the management processes we use to implement our commitments. By stating our commitments, Norwegian Church Aid encourages our stakeholders to view and monitor our work, and to hold us accountable if we fall short of our commitments. All staff have to read and adhere to the policies that are relevant to their position and understand the consequences of not adhering to them.

All Norwegian Church Aid Country Offices are required to establish a system for complaints handling within 12 months of office establishment. The local procedure should be developed in consultation with partners, key related stakeholders and the rights holders to ensure that it is legitimate and culturally and socially appropriate.

NCA has an organisational commitment to respect human rights. We aim to conduct our work in an open, transparent, fair, and in a manner, which facilitates for learning and where we are accountable for our actions. An effective and human rights' compatible complaints handling system can help us respect the rights and dignity of those who raise a complaint against us, and improve our accountability to partners, rights holders and other stakeholders. A complaints handling system can alert us to issues of abuse of power, misuse of funds, human rights abuses and possible adverse impacts on human rights in our work and partnerships. Moreover, it can assist us to rectify and remedy mistakes, manage risks, improve security and generally improve the quality of our deliveries.

More information about our complaint handling mechanism can be found here:
<https://www.kirkensnodhjelp.no/en/about-nca/accountability/complaints/>

1.B.2 How is the significance of the enterprise's due diligence work defined and clarified for the employees through their job description (or the like), work tasks and incentive structures?

With a global operation in more than 20 countries, the responsibility for following up due diligence assessments lies in various functions without being specifically described in job descriptions.

HR is responsible for the follow up of matters related to employees or whistleblowing, while the finance department follows up on corruption cases.

Procurement Committees in all Country Offices have a Terms of Reference (TOR) based on a global template. The TOR describes the roles and responsibilities in the committee. They are responsible for supplier assessments and due diligence. Programme departments follow up on the environment and negative impact from projects.

1.B.3 How does the enterprise make sure employees have adequate competence to work on due diligence for responsible business conduct?

All staff members must complete NCA's Code of Conduct training every year. <https://actalliance.org/documents/act-alliance-code-of-conduct/>

Global Logistics at Head Office is frequently running webinars for logistics, finance and programme colleagues in our Country Offices.

1.C. Plans and resources

1.C.1 How are the enterprise's commitments to respect people, animals, society and the environment embedded in strategies and action plans?

Core Humanitarian Standard

Accountability is central to NCA's values and the principles that inform our work and approach. NCA is therefore certified towards the Core Humanitarian Standard (CHS).

This is an organisation wide certification which means that these standards and commitments apply to all NCA departments and alignment to them has to be evident in all policies, routines, guidelines and practices. This also includes a commitment to train, support and monitor our partners' progress.

The commitments in the Core Humanitarian Standards are:

1. Communities and people affected by crisis receive assistance appropriate and relevant to their needs.
2. Communities and people affected by crisis have access to the humanitarian assistance they need at the right time.
3. Communities and people affected by crisis are not negatively affected and are more prepared, resilient and less at-risk as a result of humanitarian action.
4. Communities and people affected by crisis know their rights and entitlements, have access to information and participate in decisions that affect them.
5. Communities and people affected by crisis have access to safe and responsive mechanisms to handle complaints.
6. Communities and people affected by crisis receive coordinated, complementary assistance.
7. Communities and people affected by crisis can expect delivery of improved assistance as organisations learn from experience and reflection.
8. Communities and people affected by crisis receive the assistance they require from competent and well-managed staff and volunteers.
9. Communities and people affected by crisis can expect that the organisations assisting them are managing resources effectively, efficiently and ethically.

More information about the Core Humanitarian Standard can be found here: <https://corehumanitarianstandard.org/>

Climate and environment charter for humanitarian organisations

NCA is signatory to the Climate and Environment Charter for Humanitarian Organisations. <https://www.climate-charter.org/>

NCA signed the Climate and Environment Charter for Humanitarian Organisations in 2021 and joined the 300+ other humanitarian organisations that have committed to develop targets and action plans in response to the climate and environment crises.

NCA's ability to save lives, build resilience and seek justice depends on the choices we make. We must be part of the solution and help vulnerable people and marginalised communities adapt to a changing climate and environment, while also increasing our own environmental sustainability and mobilising others to do the same.

NCA's Climate and Environment Charter Commitments have been included in NCA's Strategic Priorities and affect all aspects of NCA's work. The Sustainable NCA working group is responsible for coordinating implementation of the action plan and monitoring progress towards achieving NCA's commitments, which will be renewed in 2025.

1.C.2 How is the enterprise's strategies and action plans to work towards being responsible and sustainable followed up by senior management and the board?

The General Secretary reports quarterly to the Board of Directors.

The board is informed about the status in relation to the goals we have set. The same happens at senior management level and in the various departments and with each employee in the form of departmental goals that must be in line with NCA's strategic priorities. This is followed up by managers, and finally reported annually to the senior management team through a "traffic light model". The management then sees how each department has carried out the targets and measures they set at the beginning of the year.

One of the strategic priorities in 2023 has been "An environmentally sustainable NCA":

By 31 December 2023, NCA can document improved environmental sustainability against the targets of the Climate and Environment Charter for Humanitarian Organisations. This includes a progressive reduction in carbon emissions, use of sustainable materials and solutions in our operations, and ensuring that climate and environmental risks are addressed throughout the organisation.

This priority has been followed up by each department, the senior management team and the board.

Country Offices are followed up based on an Annual Assignment Letter with the general organisational goals and country specific targets.

1.D Partnerships and collaboration with business relationships, suppliers in particular

1.D.1 How does the enterprise emphasise the importance of responsible and sustainable business conduct in its business relationships, particularly in the supply chain?

When calling for tenders, our Code of Conduct for Contractors and other corresponding requirements are communicated in the tender documents. Each tenderer has to sign that they certify and attest compliance with the Code of Conduct for Contractors in order to be eligible. See <https://www.kirkensnodhjelp.no/en/about-nca/for-contractors/>

All suppliers are screened against the terror lists of our main donors.

For our main product categories we are in the process of developing specifications that are specifically related to risks for people, society and the environment.

1.E Experiences and changes

1.E.1 What experiences have the enterprise encountered during the reporting period concerning responsible business conduct, and what has changed as a result of this?

Waste and littering

The emphasis that was put in 2023 to increase staff awareness and buy-in has enabled office waste management to significantly improve. The efforts put on capacity building will continue throughout 2024 with the deployment of an environmental screening tool for projects.

Anti-Corruption

Learning and transparency are vital parts of the fight against corruption. To avoid that the same mistakes are repeated, we put strong emphasis on learning. Each closed corruption case is published on the NCA web site, with a description of what we have learnt from the case. Please note that only closed alert cases are published. See closed corruption case information on this page: <https://www.kirkensnodhjelp.no/en/about-nca/work-against-corruption/>



2

Defining the focus for reporting

Identify and assess the enterprise's impact on people, animals, society and the environment

“Identify and assess” is about identifying the enterprises's risk for, and actual negative impact on, people, animals, society and the environment, including in the supply chain and through business relationships. As a first step the enterprise should get an overall risk picture, before subsequently prioritising further mapping and measures where the risk of negative impact is the greatest, i.e. salient issues. The enterprises's involvement in the negative impact on people, animals, society and the environment is central to determine which measures the enterprise should implement in the next step of the due diligence model. Involvement of stakeholders, especially those affected, is central when assessing risks. It is also important to consult with stakeholders when implementing measures to manage the negative impact.

2.A Mapping and prioritising

PRIORITISED ACTUAL OR POTENTIAL NEGATIVE IMPACT ON PEOPLE, ANIMALS, SOCIETY, AND THE ENVIRONMENT

Prioritising one or more risk areas on the basis of severity does not mean that some risks are more important than others, or that the company should not take action on other risks, but that risks with the greatest negative impact are prioritised first. Mapping and prioritisation are a continuous process.

2.A.1 List the enterprises's actual negative impacts and/or prioritized significant risks of negative impact/harm on people, animals, society and the environment. Take note that the prioritized risk that you list in the table below will be exported to step 3 of this report, where you will be asked to answer how you work with stopping, preventing, or reducing the negative impact.

Salient issue	Related topic	Geography
Safety in the workplace	Occupational Health and safety	Afghanistan Angola Burkina Faso Congo Ethiopia Lebanon Mali Malawi Nigeria Pakistan Sudan Somalia South Sudan Syria Zambia

Sexual harassment, exploitation and abuse	Harsh and inhumane treatment	Afghanistan Angola Burkina Faso Congo Ethiopia Lebanon Mali Malawi Mozambique Nigeria Pakistan Sudan Somalia South Sudan Syria
Corruption	Corruption	Global
Waste	Waste Use of materials	Afghanistan Angola Burkina Faso Congo Ethiopia Lebanon Mali Malawi Nigeria Norway Pakistan Sudan Somalia South Sudan Syria Zambia
Greenhouse gas emissions	Greenhouse gas emission Energy	Global

JUSTIFICATION FOR THE PRIORITISATION OF RISKS OF NEGATIVE IMPACT ON PEOPLE, ANIMALS, SOCIETY, AND THE ENVIRONMENT

2.A.2 Describe: a) the enterprise's routines for mapping and identifying risk and show how the negative impact was identified and prioritised in this period: b) eventual aspects of the enterprise that have not been covered in this report (product groups, own products, departments etc.) and why you not chose to prioritize these in the continued work: c) how information was gathered, what sources were used, and which stakeholders have been involved/consulted: d) whether you have identified areas where information is lacking in order to get an overview, and how you are planning to proceed to collect more information/handle this.

These above categories are considered high risk factors which are caused by, contributed to, and directly linked to NCA's work. Having identified these risks, NCA staff from different departments and locations, in cooperation with two country offices, have ranked the categories from a low to high risk of adverse impact. In addition, we have taken into consideration our influence to improve the situation. Accordingly, safety in the workplace is an area of high risk and high influence, making it a high priority to remediate. It is important to NCA that our work with the due diligence assessments will contribute to improve workers' rights and respect for fundamental human rights, which is why the risks are prioritised according to our possibility to influence. Multinational enterprises that for example deliver computers or vehicles to NCA have not been considered since our influence is minimal.

We have assessed risks related to the specific countries by using these global sources:

- 1) ITUC – International Trade Union Confederation (ITUC): Annual Survey of Violations of Trade Union Rights
- 2) Transparency International: Corruption Perception Index
- 3) Global slavery index: Estimated vulnerability for modern slavery per country.
- 4) Civicus Monitor Index: Assesses the space for civil society based on legislation and enforcement of the right to freedom of assembly, organisation, and freedom of expression.
- 5) Environmental Performance Index: Rank countries in terms of protection of human health and protection of ecosystems.

Risks related to suppliers and procurements are based on the largest procurement categories and known risks in the supply chain and will gradually be identified by using new industry tools (within the humanitarian and development aid sector) and tools provided by Ethical Trade, CSR Risk check, DFØ high risk list and The Norwegian Consumer Authority. Risks related to NCA's programmes, operations and activities are relevant for NCA to investigate as the possibility to influence is high. To gather information regarding potential risks NCA will involve the organisation to map out risk situations in the first years. Collaboration with other partner organisations and involvement of stakeholders are also potential sources of information.

ADDITIONAL SEVERE IMPACTS

2.A.3 Describe any other negative impacts on people, animals, society and the environment that were identified in the mapping of the enterprise, supply chain or other business relationships during the reporting period and how these have been handled.



3

Management of salient issues

Cease, prevent or mitigate negative impacts

“Cease, prevent and mitigate” is about managing findings from the risk assessment in a good way. The most salient negative impact on people, animals, society and the environment should be prioritised first. This does not mean that other risks are insignificant or that they are not handled. The way the enterprise is involved in the negative impact is key to taking the appropriate action. Negative impact that the enterprise causes or contributes to must cease, be prevented and be reduced. To address negative impact directly linked to the enterprise, e.g. in the supply chain, the business must use its leverage to influence the entity causing the negative impact to cease, prevent or mitigate it. This involves developing and implementing plans and routines to manage risk and may require changes to the enterprise’s own policy documents and management systems. Effective management of the negative impact on people, animals, society, and the environment is a major contribution to the achievement of the Sustainable Development Goals (SDGs).



3. A Cease, prevent or mitigate

3.A.1 For each salient risk, add a goal, progress status and describe the measures you have implemented to handle the enterprise's prioritized negative impact on people, animals, society, and the environment

Salient issue	Safety in the workplace
Goal :	To promote safety in the workplace where suppliers or the local community might be in danger of being harmed. This can for example be construction projects where workers have no adequate safety equipment.
Status :	This topic was discussed with country directors in 2023. A new project monitoring tool has been developed in 2023 and will be tested and rolled out in 2024.
Goals in reporting year :	Improve the awareness of NCA's staff of risks for supplier staff or the local community.

Describe already implemented or planned measures to cease, prevent or mitigate negative impacts and reasoning behind the selected measures :

This is part of the Code of Conduct for Contractors that must be signed and accepted by suppliers.

Describe actual or expected results of measures mentioned above, as well as goals and activities for the coming reporting year :

The new project monitoring tool will be tested in 2024. With the inclusion of this topic we expect to raise awareness with our local staff so that they can contribute to prevent dangerous situations for workers or local community members.

Salient issue	Sexual harassment, exploitation and abuse
Goal :	To minimise sexual harrassment, exploitation and abuse by suppliers and by our partner suppliers.
Status :	This topic was dicussed with country directors in 2023. A project monitoring tool has been developed in 2023 and will be tested and rolled out in 2024.
Goals in reporting year :	Improve the awareness of NCA's staff of risks where supplier-staff is in contact with the local community or refugee community.

Describe already implemented or planned measures to cease, prevent or mitigate negative impacts and reasoning behind the selected measures :

We have a policy for the "Protection from Sexual Harassment, Exploitation and Abuse (PSHEA), and Child Safeguarding (CS)"

The topic is also part of our Code of Conduct for Contractors that must be signed and accepted by suppliers.

NCA has Complaints Mechanisms that allow people to file complaints about NCA-, partner- or supplier staff. These complaints are handled as sensitive complaints by the Complaints Board at our Head Office in Norway.

Describe actual or expected results of measures mentioned above, as well as goals and activities for the coming reporting year :

The project monitoring tool will be tested and rolled out in 2024. With the inclusion of this topic we expect to raise awareness with our local staff so that they can contribute to the prevention from sexual harassment, exploitation and abuse in the supply chain of our project implementation.

Salient issue	Corruption
Goal :	Our organization's vision is a just world for all. Corruption primarily affects the poor, marginalized and most vulnerable groups in many countries. These are the target groups for our work. We see Anti-corruption as a central part of our work and the fight against corruption as fundamentally a fight for justice.
Status :	NCA works in countries with a high risk of corruption. We have put control and complaints systems in place that enable us to detect many cases of corruption. We have a handling system in place, but we still need to get better at using corruption cases for learning.
Goals in reporting year :	Our goal is to work with prevention, early detection, handling, and educational development.

Describe already implemented or planned measures to cease, prevent or mitigate negative impacts and reasoning behind the selected measures :

Financial risks, fraud, and corruption are mitigated by collaborative project monitoring between the programs, logistics, and finance departments whilst utilizing NCA's existing systems, policies, and tools. NCA maintains a zero-tolerance policy, of which staff and partners are continually reminded. Additionally, an anti-corruption report is published annually on NCA's website.

We have continued to focus on strengthening internal control systems, exercising control of partners' financial information, and conducting spot checks. Partner organizations receive training in financial management and procurement, and NCA's finance team has dedicated resources to assure the quality of audit processes.

Rights-holders are encouraged and empowered to use NCA's complaints mechanisms.

Strong emphasis is placed on strengthening partners' complaints handling procedures.

Describe actual or expected results of measures mentioned above, as well as goals and activities for the coming reporting year :

In 2024 we will focus additional attention on learning from previous corruption cases, while at the same time developing widespread institutional training models. We plan to examine case studies in various forums as an educational tool. These forums seek to raise awareness on the high risk of corruption and the ways to prevent, mitigate, and detect it.

Salient issue	Waste
Goal :	Integrate the principle of Reduce - Reduce - Recycle in NCA programmes and operations.
Status :	NCA Climate Resilient Water, Sanitation and Hygiene (CRWASH) programme follows the Sphere standards which include mitigation measures related to solid waste and wastewater management. Resource recovery projects are developed under the Climate Smart Economic Empowerment (CSEE) programme. NCA country offices report on the management of their office waste through the Country Environment Checklist
Goals in reporting year :	Improve waste separation and recycling in offices in 2023 compared to 2022.

Describe already implemented or planned measures to cease, prevent or mitigate negative impacts and reasoning behind the selected measures :

NCA has chosen the Nexus Environmental Assessment Tool (NEAT+) for conducting environmental assessment for projects.

It is specifically designed to address the needs of humanitarian practitioners and gives a snapshot of environmental vulnerabilities in their operations and highlights any underlying risks to the environment and affected communities associated with specific activities. The tool enables field practitioners to integrate mitigation measures to their projects but can also be used to raise interest in environmental issues for advocacy and fundraising purposes.

Examples of mitigation measures related to waste and sustainable resource management in shelter projects:

- identify local waste management solutions
- organise waste management within the area
- raise awareness of dangerous practices (e.g. burning plastics)
- ensure that areas used for waste burial are not used for other purposes
- provide separate dump-point for organic and inorganic waste
- train people to produce soil stabilized bricks instead of burnt bricks
- create grassland and woodlots sustainably, managed by community groups, for roof thatching and timber
- diversify material dependency and livelihoods opportunities to prevent deforestation

Describe actual or expected results of measures mentioned above, as well as goals and activities for the coming reporting year :

Trainings on NEAT+ will be conducted in 2024, targeting primarily WASH officers, Humanitarian officers and Environmental focal points in Country offices.

There is an ambition to train 20 new people in 2024

Efforts to improve the management of waste generated in our own offices will continue in 2024.

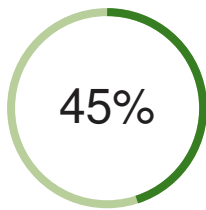
Indicator

Number of NCA staff members trained in NEAT+

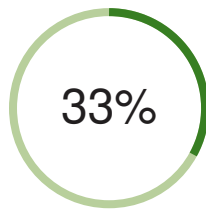
2023: 2

2022: 0

NCA offices that divert non-organic waste to municipal or other recycling system

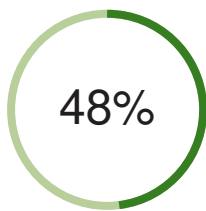


2023

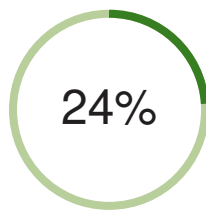


2022

NCA offices that divert organic waste for some type of composting

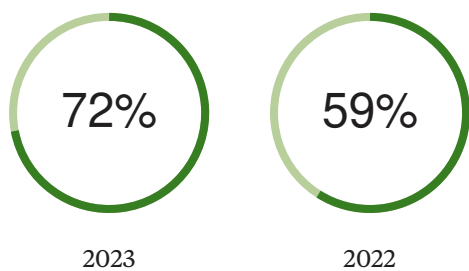


2023

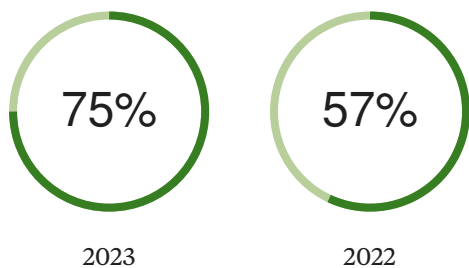


2022

NCA offices that store E-waste and batteries for planned safe disposal or recycling



NCA offices that dispose of hazardous materials safely and according to local regulations



Salient issue	Greenhouse gas emissions
Goal :	Mitigation of greenhouse gas emissions
Status :	The use of a monitoring tool for fuel consumption has largely improved compared to the previous years. Consultations for the revision of the NCA travel policy are ongoing. Awareness raising campaign completed in October in 2023.
Goals in reporting year :	Establish 2023 as NCA's reference year for greenhouse gas emissions reduction goals. Reduce direct emissions from power generation. Reduce indirect emissions from international air travel.

Describe already implemented or planned measures to cease, prevent or mitigate negative impacts and reasoning behind the selected measures :

Publish a carbon report as part of NCA annual activity report.
Complete the implementation of solarisation and energy efficiency projects in Sudan and Tanzania and start the process in another NCA country office.
Include the principle of carbon budgets in NCAs travel policy to reach the emissions reduction goal related to international air travel.

Describe actual or expected results of measures mentioned above, as well as goals and activities for the coming reporting year :

Establishing a base year following the greenhouse gas protocol will allow NCA to set science based targets and work systematically with the mitigation of its GHG emissions.
Energy efficiency and solarisation projects will allow to reduce the dependency on diesel generators.
Carbon budgets for international air travel will increase buy-in at all levels.
They will also allow to reach emissions reduction goals without affecting programme quality and our capacity to respond to emergencies.

Indicator

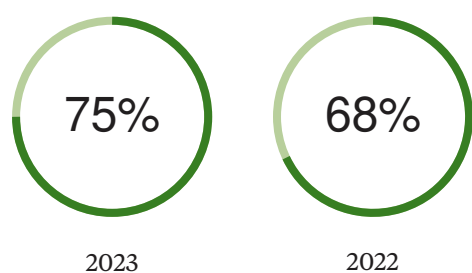
GHG emissions from international air travel in tCO2e



NCA offices that monitor fuel consumption from vehicles and generators



NCA offices that have routines for energy management



3.B OTHER ACTIONS RELATED TO MANAGEMENT OF NEGATIVE IMPACTS

Describe the enterprise's general measures to cease, prevent or mitigate negative impacts, including in the supply chain.

3.B.1 Reduction of nature- and environmental impact

See salient issues

3.B.2 Reduction of greenhouse gas emissions

See salient issues

3.B.3 Adapting own purchasing practices (sourcing)

See salient issues

3.B.4 Choice of products and certifications

See salient issues

3.B.5 Actively support free trade union organisation and collective bargaining, or where the law does not allow it, actively support other forms of democratically elected worker representation

The goal of NCA's Fighting Inequality programme is fair and equitable finance and redistribution of resources. To reach this goal, NCA and partners will influence duty-bearers to increase spending to reducing poverty and inequality and to mobilise communities for just resource governance.

Partners will be supported to advocate for increased social spending and progressive taxation to secure that domestic resources are redistributed in a way that reduces poverty and inequality. NCA and partners mobilise rights-holders to hold duty-bearers accountable and engage faith actors as ambassadors for reduced economic inequality.

Through its Fighting Inequality programme, NCA and its partners advocate for natural resources to benefit citizens and for public plans and budgets to reduce poverty. Rights-holders are empowered to hold governments and mining companies accountable. Community mobilisation and advocacy is backed up by coordinated advocacy at national, regional and international levels. NCA enables faith actors and youth to carry out representative and coordinated advocacy at all the above-mentioned levels and works strategically to strengthen and establish strong and influential civil society alliances.

3.B.6 Contribution to development, capacity building and training internally and of suppliers and workers in the supply chain

See salient issues

3.B.7 Combatting corruption and bribery in own enterprise and supply chain.

See salient issues

3.B.8 Other relevant information concerning the enterprise's work to reduce, prevent, and manage negative impact on people, animals, society and the environment

See salient issues



Tax justice now!

4

Track implementation and results

Tracking implementation of actions and results relates to measuring the effects of the systematic approach and own work in each step of the due diligence process, showing whether the enterprise conducts sound due diligence work. The enterprise needs to have procedures and routines in place in order to uncover and critically assess own conclusions, prioritizations and measures that have been made as part of the due diligence process. For example, is mapping and prioritisation of salient issues done in a scientifically sound and credible way? Does it reflect the actual conditions in the supply chain? Do measures aimed at ceasing, preventing and reducing the enterprise's negative impact work as intended? Is negative impact remediated where relevant? This may apply to measures taken by the enterprise alone or carried out in collaboration with others. The enterprise's experiences from working on due diligence should be used to improve procedures and routines in the future.

4.A. Track and assess

4.A.1 Describe the a) assignment of responsibility for tracking the effect and result of measures implemented to cease/prevent/mitigate salient risks of negative impact on people, animals, society and the environment, as well as how the tracking is done in practice, b) who is responsible for evaluating the enterprise's implementation and work with due diligence, and how the evaluation is done in practice.

NCA ensures that activity plans related to the Core Humanitarian Standards (CHS) and the Climate and Environment Charter are closely followed up by designated individuals. After each CHS audit, the CHS status is reported to the Senior Management Team. Additionally, the status on the Climate and Environment Charter commitments are reported annually.

4.A.2 Describe how the enterprise ensures that measures taken to identify, prevent and reduce negative impact actually work



5

Communicate how negative impacts are addressed

A prerequisite for good external communication on due diligence for responsible business conduct is that it builds on concrete activities and results. Enterprises should make relevant documents concerning due diligence publicly accessible, i.e. policies, codes of conduct, guidelines, processes and activities related to identifying and handling the enterprise's actual and potential negative impacts on people, animals, society and environment. Communication should include information about how the risks have been identified and handled, as well as the effect of the measures/activities. The Transparency Act (Åpenhetsloven) §5 requires companies to publicly account for their human rights due diligence on an annual basis.

5.A External communication

5.A.1 Describe how the enterprise communicates with affected stakeholders about managing negative impact

NCA has a zero tolerance towards corruption. We publish all corruption or embezzlement cases at <https://www.kirkensnodhjelp.no/om-oss/arbeid-mot-korrupsjon/when>. As part of our ongoing work to combat corruption, we publish an anticorruption report each year. We have a comprehensive complaint system (bad behavior, misconduct, embezzlement etc) vertically integrated in the whole organization.

NCA's Complaints Mechanism is communicated to employees, partners and local communities. It allows people to file complaints about NCA-, partner- or supplier staff.

NCA informs donors of any indication of financial irregularities in or related to any project.

5.A.2 Describe how the enterprise publicly communicates its own work on identifying and managing negative impact/harm

Annual reports to Ethical Trade Norway are available on our website <https://www.kirkensnodhjelp.no/en/about-nca/accountability/> in addition to being published via Ethical Trade Norway. Our webpage on anti-corruption is updated regularly at <https://www.kirkensnodhjelp.no/om-oss/arbeid-mot-korrupsjon/when>.

In our Annual Report and Financial Statements we publish a carbon report.

5.A.3 Describe the enterprise's routines for maintaining and answering external inquiries related to the information requirement imposed by the Transparency Act

Norwegian Church Aid receives external enquiries via nca-oslo@nca.no, presse@nca.no or giver@kirkensnodhjelp.no, and a 24hour press number for journalists. External questions are also answered by our service center. All comments in all social media are looked at, and answered when required. Enquiries are answered by our communications department, which investigates the questions together with relevant departments and Country Offices.



6

Provide for or cooperate to ensure remediation when appropriate

Once an enterprise has identified that it has caused or contributed to negative impact on people, animals, society or the environment, the enterprise must provide for, or cooperate in, remediation. Remediation may involve financial compensation, a public apology or other ways to remediate the negative impact. Another aspect of remediation is that companies should provide for, or cooperate with legitimate complaint mechanisms, to ensure that workers and/or local communities can raise complaints and be heard.



6.A Remediation

6.A.1 Describe the enterprise's policy for remediation of negative impacts on people, animals, society and the environment

NCA's global complaints handling policy and guidelines, developed in-line with Norwegian law, donor requirements and international best practices, is the foundation of NCA's work on complaints. This policy and guidelines are the basis of all country complaint mechanisms, which are contextualized to each country, programme, project, and target group. All country offices are required to develop contextualized complaints handling mechanisms within one year of establishment, as are all partners to NCA globally.

At head office, all complaints are handled by the Complaints Team, consisting of 4-5 case handlers. The Complaints Team receives all complaints, also anonymous complaints, and conducts a first- and preliminary assessment, before presenting it to the Complaints Board. The Complaints Board decides the way forward and whether to initiate an investigation. If they decide to initiate an investigation, they also decide whether to conduct an internal or external investigation. The Complaints Board also makes conclusions based on the investigation report, before delegating the follow-up of the conclusion to relevant line management.

If the Complaints Board concludes to conduct an external investigation, NCA will engage one of the four investigation companies currently with an agreement with NCA. All investigations, internal and external, follow the CHS Alliance Investigation Guidelines.

When a conclusion exists, the complainant and the subject of complaint are entitled to appeal the Complaints Board's conclusion to the Appeal Committee, consisting of individuals who have no prior involvement in the previous process. The Appeal Committee takes its decision according to set criteria and can either support the Complaints Board's conclusion or decide to reopen the case with new case handlers.

All country offices must have at least one complaint focal point (ideally two, one of each gender) and a complaints team. If they receive a complaint that relates to a possible breach of NCA's Code of Conduct (sensitive complaints), the complaint must be forwarded to the Head Office complaints team to ensure that all sensitive complaints are equally handled and to comply with donor requirements. If they receive an operational complaint, the country office complaints team establish an action plan and solve the case locally.

In addition to immediately reporting sensitive complaints to Head Office, all country offices report on all complaints received locally on a quarterly level to Head Office. The Head Office Complaints Advisor reports to NCA Management and Board. An annual report on complaints is also presented to NCA Management and Board at the beginning of each year.

6.A.2 If relevant, describe cases of remediation in the reporting year

There have been no reported cases of negative impact related to labor rights, the environment or social issues from NCA or partner's activity or recipients of assistance.

We have investigated reported cases related to corruption with associated corrective measures, and this is explained to the donors who finance the initiative and published on our webpage under the topic "work against corruption".

6.B. Ensure access to grievance mechanisms

6.B.1 Describe what the enterprise does to ensure that employees in own enterprise and other stakeholders, especially impacted workers and local communities have access to whistleblowing systems and grievance mechanisms when this is needed

All NCA Country Offices are required to establish a system for complaint handling within 12 months of office establishment. The local procedure should be based on NCA's guideline and developed in consultation with partners, key related stakeholders and the rights holders to ensure that it is legitimate and culturally and socially appropriate.

The Complaints and Response Policy and Procedure for NCA's programmes is setting the standard for establishing and maintaining complaints handling procedures in NCA's Country Offices. NCA staff can also use it when they support and facilitate partners' work with complaint handling.

NCA has an organisational commitment to respect human rights. We aim to conduct our work in an open, transparent, and fair manner, which facilitates for learning and where we are accountable for our actions. An effective and human rights' compatible complaints handling system can help us respect the rights and dignity of those who raise a complaint against us, and improve our accountability to partners, rights holders and other stakeholders. A complaints handling system can alert us to issues of abuse of power, misuse of funds, human rights abuses and possible adverse impacts on human rights in our work and partnerships. Moreover, it can assist us to rectify and remedy mistakes, managerisks, improve security and generally improve the quality of our deliveries.

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