SH|FT

SH|FT Policies and Codes of Conduct

Safe Havens Freedom Talks

Adopted by the Board · October 2026

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Related Documents and Cross-References

This document sets out SH|FT's policies and codes. It should be read alongside the **SH|FT Organisational Manual** (adopted August 2026, updated as required), which sets out the operational procedures that give effect to these policies. In particular, the Organisational Manual details:

- Signatories and bank access arrangements
- Monthly and annual financial reporting to the economy consultant
- Auditor rotation (a new auditor to be elected after 7 years at the latest)
- International payment procedures for transactions outside standard bank channels
- Requirements for written agreements and Tax Identification Numbers (TIN) for payments to individuals outside Sweden
- Credit card use and prohibition on advances or petty cash
- Travel policy, including per diems in line with Swedish Tax Agency recommendations

- Inventory list for equipment worth 500 SEK or more
- Staffing procedures, including the Director's authority to contract staff for assignments of up to three months
- Requirement for procurement where a family or close-friend relationship exists between staff or Board members and a supplier or contractor
- Board composition, meeting cadence and per capsulam decisions
- Insurance arrangements

Where a procedure is set out in the Organisational Manual, that document takes precedence for operational detail. Where a policy principle is set out here, this document takes precedence for interpretation.

Where this document assigns a responsibility to the Director, the practical execution of tasks may be delegated to staff. The responsibility itself remains with the Director.

Code of Conduct and Ethical Guidelines

SH|FT is committed to conducting its work with integrity, honesty and respect for the dignity of all those it engages with — including staff, Board members, artists, partners, participants and the wider public. This Code of Conduct sets out the ethical guidelines that govern SH|FT's day-to-day work, and applies to everyone acting on behalf of the organisation. It is read alongside the more specific policies that follow, in particular the Anti-Corruption Policy, the Reporting and Whistle-blowing procedure, and the policies on Equality and International Cooperation.

SH|FT will not tolerate harassment, abuse, offensive behaviour or intimidation by or of staff, volunteers, Board members, interns and service users.

Discrimination or harassment by staff or volunteers will be taken seriously and dealt with under the grievance and disciplinary procedures. Serious cases may constitute gross misconduct, resulting in immediate suspension.

Discrimination or harassment by a service user or member of the public will also be taken seriously. Staff and volunteers are not expected to continue to provide a service to users who are being abusive.

Responsibility, Service, and Public Mindedness

SH|FT is an association (ideell förening) under Swedish law. Where the following sections refer to NGOs, this reflects standards and norms established for the sector on a global scale, which SH|FT applies to its own work.

Sustainable progress, peace, and justice require that NGOs contribute to the common good. Thus, SH|FT integrates self-development and service to others, balancing individual and public concerns, focusing on higher, broader, and more public levels of service. SH|FT is honest and truthful in its dealings with its funders, project beneficiaries, staff, membership, partner organizations, government, and the public in general, and respects the laws of any jurisdiction in which it is active.

Responsibly maintaining itself, SH|FT conducts its activities for the sake of others, including the public at large as well as its target group – artists, arts organisations, human rights workers and NGOs, cultural policy actors.

All public assets are treated with utmost seriousness, as a public trust.

SH|FT recognizes that its conduct and activities impact on the public's perception of the sector and that it shares responsibility for public trust in it.

SH|FT exhibits a responsible and caring attitude toward the environment in all of its activities.

Implementation and Review of these Policies and Practices

The Board has ultimate responsibility for implementation and timely review of the effectiveness of these policies. The Board will review the policy and procedures regularly and make recommendations for changes or improvements.

The Director, through the normal management structure, is responsible for ensuring that the policy and procedures are implemented.

Once a year the Board designates a meeting where these policies, as well as salaries, performance reviews and the Handbook are audited and amended as necessary.

Human Rights and Dignity, Equality, Anti-Racism and Anti-Sexism

SH|FT is committed to promoting equality of opportunity and to actively opposing discrimination of all kinds. SH|FT recognizes the fundamental human rights with which all

persons are endowed and that all people are born free and equal in dignity. SH|FT is sensitive to the moral values, religion, customs, traditions, and culture of the communities they serve.

SH|FT recognises and welcomes the diversity of cultures and individual needs within its membership, stakeholders and communities of interest.

SH|FT has established measures to deal with all direct or indirect discrimination in its employment practices and its provision of services.

SH|FT will seek to implement a programme of positive action to make its equal opportunities policy fully effective, and to ensure that no applicants, staff, volunteers, members or service users receive less favourable treatment on the grounds of race, ethnicity, religion, disability, health status, gender, sexual orientation, marital and civil partnership status or because of their age.

All Board members, ordinary members, staff, interns, and volunteers are expected to act within the equal opportunities policy. All self employed and other contract workers (e.g. consultants, trainers, etc) will be expected to work within this policy.

All procedures implemented as part of the above commitment will be regularly monitored for effectiveness and the policy reviewed at least annually, with changes made where necessary. Any suggestions for possible improvements in this policy or its implementation will be welcomed by the project.

Equal Opportunities and Anti-Discriminatory Practice Training

SH|FT will aim to provide all staff, volunteers and interns as well as Board members with training on anti-discriminatory practice and procedures.

International Cooperation, Partnerships and Collaboration

SH|FT maintains ethical, cooperative relationships with other NGOs, and partners where possible and appropriate for the sake of the greater public good.

SH|FT works with organizations and individuals that share common values and objectives.

SH|FT ensures that partners either have policies consistent with SH|FT's and/or that all contracts explicitly state that SH|FT's policies apply equally to partners and freelancers.

SH|FT collaborates with other entities only if the relationship is consistent with the SH|FT's mission.

- Collaboration is based on shared values, common ground, and the good of society.
- Collaboration is based on equitable and genuine mutual benefit to each organization.
- Collaboration allows financial transparency and a two-way flow of information, ideas, and experiences.
- Collaborations are adaptive to change. Changes in the relationship are to develop through cooperation, and not forced by one or the other organization.

When appropriate, NGOs and SH|FT, with overlapping missions, values, and target groups partner with each other and civil society organizations, when it is beneficial for the common target groups and for the achievement of common objectives.

NGOs with overlapping missions, values, and target groups refrain from competing with each other and with other civil society organizations, and should refrain from unnecessary duplication of services and disruption of each other's projects.

NGOs with overlapping missions, values and target groups should share relevant project information with other NGOs and civil society organizations, and mutually support each other.

SH|FT expresses solidarity with campaigns and actions of other NGOs, and promote the effectiveness and success of other NGOs, when it does not compromise the integrity or values of SH|FT.

SH|FT networks with other ethical NGOs as a means for promoting the growth, effectiveness and efficiency of the NGO sector and the ability to advance the public good.

Risk Management

Purpose and Scope

This section sets out how SH|FT identifies, assesses, documents and follows up on risks across its work. It formalises practices already in place at both Board and operational level, and clarifies how responsibility is shared across the organisation. The framework applies to all SH|FT activities — including the Safe Havens Meeting, exhibitions, publications, digital platforms, and collaborations with partners and network organisations — and covers risks at three levels: organisational, project and operational.

Principles

SH|FT's approach to risk is guided by the following principles:

- **Openness over rigidity** — risk is treated as an ongoing conversation, not a one-off exercise.
- **Trust with due care** — SH|FT works through established networks and trusted partners, while remaining alert to emerging concerns.
- **Local knowledge first** — risks are always assessed in dialogue with local partners who understand the context.
- **Care for the people involved** — the safety and wellbeing of artists, participants, staff and partners come before any programme goal.

Roles and Responsibilities

The Board holds overall responsibility for risk oversight. It approves this framework and reviews it annually, discusses significant risks and mitigation approaches at regular Board meetings, takes final decisions on projects and partnerships that involve elevated risk (financial, political, reputational or safety-related), and ensures adequate resourcing for risk management.

The Director leads day-to-day risk management. This includes carrying out risk assessments in dialogue with project teams and partners, documenting risks, mitigation measures and follow-up in a shared register, flagging significant or emerging risks to the Board without delay, and ensuring the framework is applied consistently across projects.

The Coordination and Communication Manager supports the process by maintaining documentation, tracking follow-up actions and helping to keep the risk register up to date.

Project teams and partners contribute to identifying and assessing risks within their areas of work, and participate in mitigation and follow-up.

Where a decision could carry significant risk to the organisation, its finances, its partners or the individuals involved, the Director consults the Board before proceeding.

Process

Risk management within SH|FT follows four steps:

1. **Identify** — risks are identified through project planning, partner dialogue, ongoing monitoring of the political and operational context, and reflection at Board and staff level.

2. **Assess** — each identified risk is assessed for likelihood and potential impact, using a simple three-tier scale (low / medium / high).
3. **Mitigate** — mitigation measures are defined for each significant risk, with a named responsible person and a timeline.
4. **Follow up** — risks and mitigations are reviewed regularly, and documented in a shared risk register that feeds into project debriefs and Board reporting.

For larger projects and events (such as the Safe Havens Meeting or major exhibitions), a project-specific risk matrix is prepared during planning and reviewed throughout implementation. For smaller engagements (e.g. one-off speaker invitations), risk is considered through the standard planning conversation, without a formal matrix.

Risk monitoring is carried out by the Director as part of project planning and follow-up. Publicly available data — such as EU sanctions lists, Transparency International's country assessments, and guidance from the Swedish Arts Council and SIDA — is checked against the operating context of each project, and combined with first-hand reports from staff, partners and network contacts. Significant findings are recorded in the project risk matrix and raised with the Board.

Documentation and Review

All significant risks are logged in a shared risk register. Project-level risk matrices are stored alongside project documentation. The framework itself is reviewed by the Board on an annual basis, or sooner if circumstances require.

Risks in Conflict Situations in Specific Territories

In situations of political violence and armed conflict, SH|FT exercises particular vigilance to avoid any risk of instrumentalisation or diversion of the resources of its activities for the benefit of military forces or armed groups, whatever their status and motivations. We do not tolerate any form of influence peddling in connection with local, national or international public authorities or private entities, whatever the country or activity concerned.

SH|FT adopts a pragmatic approach, based on an analysis that considers: risks specific to each of the countries in which it operates; risks inherent to each function or business line carried out by its personnel; and risks associated with each professional sector in its operating context.

Transparency and Accountability; Anti-Corruption Policy

SH|FT strives for openness and honesty internally and toward donors and members of the public. Periodic accountings are made. SH|FT's transparency is established through published annual reports that include financial statements including donors. These are sent out to members before the General Assembly, and are available to partners on request. Annual audits are undertaken for the association itself and for funders. The Anti-Corruption Policy and Code of Conduct are shared with employees, contractors and partners, and are also available on our website.

Assuming its responsibilities as a non-governmental actor committed to international action, mindful of the sector's professional ethics, engaged in a constant effort to ensure sound management of its operations and activities, SH|FT commits itself to upholding the highest standards possible against fraud, bribery and corruption.

SH|FT is transparent in all of its dealings with the government, the public, donors, partners, beneficiaries, and other interested parties, except for personnel matters and proprietary information.

SH|FT's basic financial information, governance structure, activities, and listing of officers and partnerships are open and accessible to public scrutiny and the public is informed about its work and the origin and use of its resources.

SH|FT is accountable for its actions and decisions, not only to its funding agencies and the government, but also to the people it serves, its staff and members, partner organizations, and the public at large.

Corruption

SH|FT does not tolerate fraud or corruption in the conduct of its activities and implements measures to reduce their risks and effects. The “Zero Tolerance” principle implies that context-specific actions are taken in response to any suspicion or proven incident.

Definitions

> **Bribery** – the offering, promising, giving, accepting or soliciting of money, gifts or other advantage as an inducement to do something that is illegal or a breach of trust in the course of carrying out an organisation's activities.

Corruption – the abuse of entrusted power for private gain. Persons vested with authority, responsibility or delegation using their position to procure undue advantages of any kind, for themselves or for a third party. Corruption involves a “transaction” and consideration in the form of money, favours, gifts or advantages. It can include abuse of power or nepotism. Certain forms of corruption can take the form of soliciting, promising, offering, giving or accepting an undue advantage, in money or in kind. This affects the normal exercise of a function and constitutes a legally or ethically reprehensible act.

Fraud – acts which, by deliberately circumventing internal, contractual or legal rules, aim to obtain an undue material or moral advantage.

Extortion – the unlawful use of one's position or office to obtain money through coercion or threats. One example would be when customs officials request undue 'customs duties' from importers as a condition to clear their goods.

Facilitation payments – these are bribes and are usually small unofficial payments made to secure or expedite the performance of a routine or necessary action to which the payer of the facilitation payment has legal or other entitlement.

Gifts and hospitality – these can range from small gifts (such as diaries) to expensive hospitality (tickets for major events, holidays etc). Extravagant gifts and hospitality may be used to disguise bribes that are intended to induce improper behaviour.

Solicitation – the act of a person asking, ordering or enticing someone else to commit bribery or another crime.

These policies include those who may be harmed including staff and Board members, beneficiaries and participants of our activities, our partner organisations and anyone they employ. This policy and its provisions apply to all of the above, as well as companies, suppliers and consultants as relevant, and SH|FT commits to ensuring they are aware of existing policies and any updates or revisions. SH|FT performs due diligence on candidates, partner organizations and suppliers with whom it contracts, to assess their legal and reputational status.

The Director is responsible for the day-to-day application of this policy, including ensuring that staff, contractors and partners are made aware of it, maintaining records of sanctions screening, and receiving and referring reports. The Board holds overall responsibility for the policy and reviews it annually.

SH|FT

Procurement Policy and Sanctions Compliance

Sanctions Screening

Before entering into a written agreement, and before making any payment to an individual or organisation outside routine goods and services, SH|FT screens the recipient against the EU and UN sanctions lists.

EU: webgate.ec.europa.eu/fsd/fsf

UN: main.un.org/securitycouncil/en/content/un-sc-consolidated-list

Screening is carried out by the Director. A dated record of each check is saved in the organisation's archive alongside the relevant agreement. Where a name appears on either list, no agreement is entered into and no payment is made, and the matter is referred to the Board.

Routine goods and services — stationery, taxis, equipment purchases and similar — do not require screening, as these do not constitute a contract or agreement.

Procurement

SH|FT compares market prices from at least three suppliers before purchasing goods or services above 300,000 SEK, and submits the contract together with the procurement documentation to the Swedish Arts Council (Kulturrådet), in line with the funding agreement. All procurement follows the fundamental principles of non-discrimination, equal treatment, transparency, proportionality, mutual recognition and foreseeability. Proof of quotes and procurement documentation must be kept.

Agreements, Payments and Approval

There should be signed agreements between SH|FT and any facilitators, project coordinators, salaried staff, consultants and organisations working on projects, stipulating what services they will provide and the costs.

Payment is made in one of two ways:

By invoice — where the recipient is a registered company or organisation, they invoice SH|FT for payment. For SH|FT to be able to report the cost in Sweden, the invoice must state an organisation tax number (this can also be an individual, provided they are registered for tax purposes — otherwise SH|FT cannot pay against an invoice).

By contract — where the recipient is an individual outside Sweden who is not registered as a company or organisation, payment is made on the basis of a signed contract, which must state that the recipient is responsible for paying tax and social costs in their home country. This option is not applicable to recipients in Sweden.

All payment vouchers, invoices and contract-based payments should be signed by the recipient and approved by the Director. Where a payment exceeds the threshold set out in the Organisational Manual, it must also be authorised jointly by two signatories.

All expenses must be approved by the Director.

Assets

An asset is any equipment purchased that will be used for several years to come, for example laptop, camera etc. All assets must be kept by SH|FT for its sole use, making sure that they remain the property of SH|FT.

A signed asset log should be kept which should indicate who has the asset at any time.

Where assets are moved off site — for example to an exhibition or event — a separate document states which items are involved, their location and the time period, and is kept with the asset log.

Major deviations from the agreed project proposal need to be approved by the Board upon request by the Director.

Records

Proper records should be kept of all the documents in the organisation's archive relating to a project, including:

- Project application documents including budget, for funded projects.
- Project signed contract, approved budget, all policies and payment requests.
- Bank statements – showing funds received.
- Approved receipts for all costs incurred (all labelled, and labels included in the financial report).
- Records of meetings; evidence of project activities that can be used for monitoring and evaluation and any eventual audit.

- Financial and narrative reports, both interim and final.

All the above should be stored in a folder/file in a systematic order easy for examining the file and finding appropriate documentation.

Records relating to a project are retained for seven years following the end of the financial year to which they relate, in accordance with the Swedish Bookkeeping Act, or longer where a funder's agreement requires it.

Financial Reporting

Financial reporting follows the format set out in the Organisational Manual.

IT Systems and Access Rights

SH|FT reviews user access rights across all its IT systems on an annual basis, or sooner where staffing or partnerships change. This includes all platforms used for storing or processing organisational data. The review is carried out by the Director, with the aim of ensuring that access is limited to those who currently require it, and that permissions are updated or revoked when roles change or collaborations end.

Reporting and Whistle-blowing, Investigations

Members and staff of the organization are invited to report suspicions of fraud and corruption, racism or sexism, in accordance with the conditions of confidentiality and security. Reports may be made to the Director or to the Chair of the Board. Reports may be submitted anonymously. Contact details for both routes are published on SH|FT's website.

Reporting mechanisms are available both internally, for members and staff, and externally, for beneficiaries, partner organizations or suppliers of goods and services. The purpose of internal investigations is to verify the existence of breaches or deliberate violations of our internal policies and directives, and where appropriate to establish individual responsibility. The investigation report's conclusions enable staff or Board members concerned to choose the appropriate measures, including — when misconduct is proven — deciding on the sanctions to be applied or the legal recourse to be taken. Incidents are recorded and reported, enabling them to be analysed and used not only by the organization's departments concerned, but also by risk management and internal audit bodies.

SH|FT commits to communicating and cooperating with donors on investigations and agreeing with them on the level of sanction required.

Examples of Situations Where Reporting Is Warranted

Staff, board or management may be confronted with any of the situations described below or similar:

1. Offered a bribe, a payment, or a favour or gift in return for actions or activity outside of the code of conduct of the association or the agreed programme or event;
2. Requested funds or actions in return for protection against loss of life, limb or liberty;
3. Offered, or asked to offer, a gift or hospitality of a value greater than 300 SEK (not including subsistence);
4. Presented with a conflict of interest of their own, of colleagues, Board members or partners.

Modest courtesy gifts, such as chocolates or small tokens exchanged during research and networking visits, are a normal part of professional and cultural exchange and do not require reporting, provided their value remains below the threshold above. Where refusing a gift would cause offence, the gift may be accepted and reported to the Director.

In any such cases, the individual experiencing the situation should report to their immediate manager or a Board member, as appropriate, giving details of the situation, the individuals involved and why they feel it needs signalling. The individual should establish this in writing. The receiver acknowledges the report within ten working days and files it in the organisation's archive, and appropriate action should be taken within a period of six weeks maximum following any necessary investigations.

Complaint mechanisms aim to be transparent, communicated and accessible, with guaranteed confidentiality and anonymity if requested. Penalties will be imposed for frivolous, false or malicious reporting. However, staff who make complaints shall be protected, both during employment and after leaving the organisation.

The resulting report should be signed and dated, with numbered paragraphs for ease of reference. It should set out the substance of the complaint, how the investigation was carried out and who contributed, the evidence considered and the findings on each issue raised, and a conclusion stating the extent to which the complaint is upheld and the reasons. The original complaint and any supporting material should be attached.

Disciplinary Action

In the event of failure to comply with the provisions of this policy, SH|FT reserves the right to take disciplinary action, terminate contracts, impose penalties, or take legal action against the perpetrators of misconduct. SH|FT commits to communicating and cooperating with donors on investigations and agreeing with them on the level of sanction required.