




ETHICS & INTEGRITY DEPARTMENT

Leadership & Integrity Code

☞SF/E&I/PD/08☞

ISSUE NO. 01

ISSUED BY: Management Representative

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FOREWARD

To guide and ensure that the Fund takes its proper place as a significant player in the social security and financial industry, the Board of Trustees (BOT) introduced the Leadership & Integrity Code. This is in line with the Leadership and Integrity Act, 2012 and the Public Service Code of Conduct and Ethics, 2016.

The Code is meant to ensure that the Fund achieves its vision to be the trusted social security provider and adheres to the highest standards of responsible business practices in its interaction with all stakeholders.

The Code provides generally accepted rules that govern and regulate behaviour, relationships and actions of staff to ensure the Fund is run professionally with ethics and integrity.


The BOT and the Senior Management are committed to the full implementation of the Code and shall take all necessary measures to ensure that it's effectively enforced. All Fund employees and service providers are expected to read and understand this Code, uphold the rules and standards in the Code and comply with all applicable policies and procedures.

Failure to adhere to the Code will attract penalties in accordance with the Human Resource Manual or relevant laws and regulations in the country.

All employees are required to sign the acknowledgment form at the end of this document and return it to their supervisors. The signing of the form demonstrates that one has received, read, understood and agree to comply with the Code.

After every three (3) years you will be asked to sign the acknowledgment form again indicating your continued understanding of the Code and commitment.

I am personally committed to this Code, and I urge each of you to show the same commitment.

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1.0 PART I – PRELIMINARY

1.0 Citation

This Code may be cited as the NSSF Leadership and Integrity Code.

1.1 Abbreviations and Definitions

- EACC - Ethics & Anti-Corruption Commission
- BOT - Board of Trustees
- MT/CEO - Managing Trustee/Chief Executive Officer
- DCI - Directorate of Criminal Investigations
- FP&DC - Fraud Prevention & Disciplinary Committee
- GAPP - Generally Accepted Accounting Procedures
- M, HR - Manager, Human Resource
- ICT - Information, Communication & Technology
- M, E&I - Manager, Ethics & Integrity
- M, IA&R - Manager, Internal Audit & Risk
- NSSF - National Social Security Fund
- BCP - Business Continuity Plan

1.2 Definition

- 1.2.1** In this code unless the context otherwise provides,
- a) **“The Board”** means the Board of Trustees, National Social Security Fund.
 - b) **“The Code”** means The NSSF Leadership and Integrity Code.
 - c) **“Member”** means a contributor to NSSF.
 - d) **“Fund”** means the National Social Security Fund
 - e) **DISRUPTION** - Incident, whether anticipated or unanticipated, that causes unplanned, negative deviation from the expected delivery of products and services according to the Fund’s objectives.

1.3 Application


1.3.1 The Code applies to all employees of the National Social Security Fund (NSSF).

1.4 Objectives of the Code

1.4.1 The overall objective of the NSSF Leadership and Integrity Code is to create an ethical and professional organization.

1.4.2 The specific objectives of the Code include:

- a) To ensure accountability of employees for their decisions, actions or omissions;

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- b) Promote discipline;
- c) Promote integrity;
- d) Establish minimum shared values;
- e) Encourage living the Fund vision, mission and core values;
- f) Defines clear parameters on acceptable principles within which NSSF employees are empowered to make decisions; and
- g) Provide a framework for reporting of misconduct by an NSSF employee.

1.5 Role of the Board of Trustees (BOT)

The Board is committed to playing an effective oversight role in enforcing the Code.

1.6 Administration of the Code

The Senior Management is responsible for enforcement of the NSSF Leadership and Integrity Code within their respective divisions/departments. It is the duty of the line managers to ensure that employees carry out their duties efficiently, honestly and to the best of their ability and knowledge. However, the Manager, Ethics & Integrity (M, E&I) shall be the overall administrator of the Code.

1.7 Living NSSF Vision, Mission and Values

1.7.1 Vision

NSSF aspires to be the trusted social security provider.

1.7.2 Mission

NSSF Mission is to provide adequate income replacement to members through prudent investments and prompt payment of benefits.

1.7.3 Core Values


The Fund employees shall live the Fund core values. The core values define how staff relates with each other or other stakeholders. The core values are customer focus, integrity, accountability, transformational and care.

1.7.3.1 Customer Focus

Customer focus refers to paying great attention to the needs and opinions of the customers.

A high quality customer experience needs to apply from initial contact through to after sales care, whether the customer generates a one-off transaction or regular business.

By having a customer focus approach, the Management of NSSF will strive to:

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- a) Promote ease of use of NSSF services;
- b) Build relationships;
- c) Deploy appropriate payment systems;
- d) Institute an effective complaints process; and
- e) Introduce member loyalty programs.

1.7.3.2 Integrity

Integrity refers to honesty, trustworthiness and faithfulness of individuals and organisations in the conduct of day today business. A person of integrity will do the right thing when no one sees. Integrity is the most influential in regard to the success of any person or business.

Integrity builds trust, influences others, facilitates high standards, results in solid reputation and brings credibility. The NSSF Board of Trustees, Management and Staff shall uphold integrity at personal, professional and institutional level to ensure the success of the Fund.

1.7.3.3 Accountability


Accountability refers to being responsible or answerable for one’s actions or inactions. It entails acknowledgement and assumption of responsibility for actions/inactions, products, decisions and policies. The NSSF Board of Trustees, Management and Staff shall be accountable to both internal and external stakeholders and will acknowledge responsibility for its decisions including their administration and implementation.

1.7.3.4 Transformational

The Transformational value refers to the ability and willingness to drive, adopt and champion change. Through open communication and diverse culture allowing people to freely share ideas. The leadership style across the entire Fund shall be characterized by inspirational motivation, intellectual influence and individualized consideration.

1.7.3.5 Care

Care is process of protecting someone or something and providing what that person or thing needs. The Fund shall foster a culture of caring for self, each other, the Fund and our members.

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The Fund owe our members a “duty of care” for the assets they have entrusted to us.

PART II - REQUIREMENTS

1.1 Compliance with Applicable Laws

The Code shall be read together with the Human Resource Manual and other Fund policies. Employees are also expected to abide by the provisions of Chapters 6 on Leadership and Integrity and Chapter 13 on the Public Service in the Constitution, Public Service Code of Conduct & Ethics, 2016, Leadership and Integrity Act, 2012, Public Officer Ethics Act, 2003, NSSF Act, 2013, Leadership and Integrity Regulations, 2015, The Public Service (Values & Principles) Act, 2015 and the Public Service Commission Procedures for Administering Part IV of the Act, 2016 (Public Officer Ethics Act, 2003) as well as other applicable legislations.

1.2 Public Trust

An employee of NSSF is a position of public trust and therefore the authority and responsibility vested in him/her shall be exercised in the best interest of the Fund and the people of Kenya.

1.3 Responsibility and Duties

An NSSF employee shall take personal responsibility for the reasonably foreseeable consequences of any actions or omissions arising from the discharge of his/her duties.

1.4 Performance of Duties


1.4.1 An employee of NSSF shall to the best of his/her ability:

- a) Carry out the duties of the office efficiently and honestly;
- b) Carry out the duties of the office in a transparent and accountable manner;
- c) Keep accurate records and documents relating to his/her duties;
- d) Report truthfully on all matters of the Fund;
- e) Not to be absent from duty without official permission; and
- f) Not to engage in private business during official working hours.


1.5 Professionalism

1.5.1 An employee of NSSF shall maintain high standards of professional ethics. The attributes of high standards of professional ethics include:

- a) Honesty
- b) High standards of integrity in their actions

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- c) Transparency when executing functions.
- d) Accountability for their actions
- e) Respect and courtesy towards others
- f) Objectivity
- g) Patriotic
- h) Observance of the rule of law
- i) Maintenance of high standards of performance and
- j) level of professionalism in the Fund
- k) Efficient, effective and economic use of resources in his/her charge.

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1.5.2 A member of professional association shall comply with the provisions of the relevant professional association regarding registration and continuing development, be bound by the code of ethics of the relevant professional association and undergo such disciplinary action of the relevant professional associations for any act of misconduct in addition to undergoing any disciplinary action of the public service for such act of professional misconduct.

1.6 Financial Integrity

1.6.1 An employee of NSSF shall not use his/her office to unlawfully or wrongfully enrich himself/herself or any other person.

1.6.2 An employee of NSSF shall not accept a personal loan or benefit which may compromise him/her in carrying out his or her duties.

1.6.3 An employee of NSSF shall submit his/her initial declaration of income, assets and liabilities within thirty days of assuming office in the Fund and thereafter after every two (2) years.

1.6.4 An employee of the NSSF shall submit a final declaration of his income, assets and liabilities before he/she is cleared to exit from the Fund.

1.6.5 A Fund employee is forbidden from borrowing or lending from or to fellow employees, or borrowing money from a member of the public with whom his/her official duties bring him into contact as provided for under the Human Resource Manual.

1.6.6 A Fund employee shall live within his/her means and shall not incur any financial liability that he/she cannot satisfy.


1.6.7 A Fund employee shall pay any taxes due from him/her within the prescribed period.

1.6.8 A Fund employee shall not neglect his/her financial or legal obligations.

1.7 Moral and Ethical Requirements

1.7.1 An employee of NSSF shall observe and maintain the following ethical and moral requirements:

- a) Demonstrate honesty in the conduct of his/her public and private affairs;

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- b) Not to engage in activities that amount to abuse of office;
- c) Accurately and honestly represent information to the public;
- d) Not to engage in wrongful conduct in furtherance of personal benefit;
- e) Not falsify any records;
- f) Not to misuse public resources; and
- g) Not to sexually harass or have inappropriate sexual relations with other employees of the Fund or any other person.

1.8 Gifts or Benefits in Kind

1.8.1 A gift or donation given to an employee of NSSF on a public or official occasion shall be treated as a gift or donation to the Fund.

1.8.2 An employee of NSSF may receive a gift in an official capacity, provided that:


- a) The gift is within the ordinary bounds of propriety, a usual expression of courtesy or protocol and within the ordinary standards of hospitality;
- b) The gift does not exceed Kshs. 20,000.00 prescribed by the regulations under the Leadership/Integrity Act 2012 or any other law;
- c) The offer and receipt of the gift is done with utmost transparency and openness; and
- d) The offer and receipt of the gift is not done in secrecy or exclusivity of the donor and recipient.

1.8.3 Any gift whose value exceeds Kshs 20,000 shall within forty-eight (48) hours of reporting to the office surrender it to the Fund.

1.8.4 Monetary items (e.g. cash, gift vouchers, cheques, shares, settlement of loans, bills, school fees, insurance premiums, etc.) are prohibited.

1.8.5 An employee of NSSF shall not:

- 1.8.5.1 Accept or solicit gifts, hospitality or other benefits from a person who:
 - a) Is under investigation
 - b) Has a contractual relationship with the NSSF; and
 - c) Has any interest that is directly or indirectly connected with the officer's duties.

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1.8.5.2 Receive a gift which has the potential of compromising his/her integrity, objectivity or impartiality.

1.8.6 An employee of NSSF who receives a gift or donation shall declare the gift or donation to the Fund within fourteen (14) days of receipt of the gift irrespective of the value.

1.8.7 The Fund shall maintain an accurate register of all gifts received by the employees. Another register shall be maintained for gifts issued by the Fund to other state/public officers.

1.8.8 The M, E&I shall maintain a gift register in headquarters (HQs). Whereas Regional Managers (RM) and Branch Managers (BM) shall maintain gift registers in their respective offices.

1.8.9 Where an employee receives a gift exceeding the stipulated amount, or the gift is anonymous, irrespective of the value, the recipient must deliver the gift to the Managing Trustee/CEO, M, E&I, RM, BM or his designated officer for disposal as appropriate.

1.8.10 A committee may be appointed by the Managing Trustee/CEO to handle gifts given to the Fund.

1.8.11 Gift collected from employees shall be used for corporate social responsibility or disposed in accordance with the Public Procurement and Asset Disposal Act, 2016.


1.8.12 The Policy does not however, stop the Fund from soliciting, receiving or giving out gifts for charitable purposes in line with the Fund's corporate social responsibility.

1.9 Wrongful or Unlawful Acquisition of Property


1.9.1 An employee of NSSF shall not use his office to wrongfully or unlawfully acquire or influence the acquisition of property.

1.10 Conflict of Interest

1.10.1 An employee of NSSF shall use the best efforts to avoid being in a situation where his/her personal interests conflict or appear to conflict with the officer's official duties.

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- 1.10.2** An employee of NSSF shall not hold shares or have any other interest in a corporation, partnership or other body, directly or through another person, if holding those shares or having that interest would result in a conflict of the employees’ personal interests and the officer’s official duties at NSSF.
- 1.10.3** An employee of NSSF whose personal interests’ conflict with their official duties shall declare the personal interests to the Fund through the prescribed forms and entered in the conflict of interest register.
- 1.10.4** The Fund may give directions on the appropriate action to be taken by the employee to avoid the conflict of interest. The employee shall comply with the directions, and refrain from participating in any deliberations with respect to the matter. Any direction issued by the Fund under this subsection shall be in writing.
- 1.10.5** An employee of NSSF shall not award or influence the award of a contract to;
- a) Himself or Herself;
 - b) The employee’s spouse or child;
 - c) A business associate or agent; or
 - d) A corporation, private company, partnership or other body in which the officer has a substantial or controlling interest.
- 1.10.6** Where an employee of NSSF is present at a meeting, and an issue which is likely to result in a conflict of interest is to be discussed, the staff shall declare the interest at the beginning of the meeting or before the issue is deliberated upon.
- 1.10.7** A declaration of a conflict of interest shall be recorded in the minutes of that meeting.
- 1.10.8** The Fund shall maintain a register of conflicts of interest in the prescribed form in which an affected employee of NSSF shall register the particulars of the registrable interests, stating the nature and extent of the conflict.
- 1.10.9 The registrable interests shall include:**
- a) Any connection with a person or a company, whether by relation, friendship, holding of shares or otherwise, which is a subject of an inspection or investigation by the Fund;

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- b) Any application of re-employment or other form of engagement with the Fund by a family member or friend of the NSSF employee or by a corporation associated with the employee of NSSF;
- c) Gifts, benefits and hospitality, including to a spouse, child, partner or business associate, or other material benefit;
- d) Offers of future employment;
- e) Remunerated employment, including office, trade, professional, or vocational, or in which the Fund employee has any pecuniary interest;
- f) Shareholdings in public or private companies amounting to a controlling interest; and
- g) Any other matter which, in the opinion of the employee of NSSF, taking into account the circumstances thereof, is necessary for registration as a conflict of interest.

1.10.10 The Fund shall keep securely the register of conflicts of interest for five (5) years after the last entry in each volume of the register.


1.10.11 The M, E&I or any other authorised officer of NSSF shall ensure that an entry of registrable interests is updated and to notify the Fund of any changes in the registrable interests, within one (1) month of each change occurring.

1.11 Participation in Tenders Issued by the Fund

1.11.1 An NSSF employee shall not participate in a tender for the supply of goods or services to the Fund.

1.11.2 A company or entity associated with the NSSF employee shall not be construed as trading with the Fund unless:

- a) The employee of NSSF has a controlling shareholding in the company or entity; or
- b) The employee of NSSF is a director of the company.

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1.12 Impartiality

1.12.1 Preferential treatment to a Fund employee on appointment, promotion, transfer based on subjective considerations such as friendship, tribe and family ties are not permitted.

1.12.2 An employee of NSSF, shall at all times, carry out the duties of the office with impartiality and objectivity and shall not practice favouritism, nepotism, tribalism, cronyism, religious bias or engage in corrupt or unethical practices.


1.13 Supervision of Close Relatives

1.13.1 The Fund prohibits the deployment of any person having a close personal relationship with another in the Fund in positions or assignments within the same department or in positions that have a financial dependence or influence for example an auditing and control relationship, or a supervisor and subordinate relationship.

1.13.2 If a relationship within the scope of this provision exists or develops between two employees, the employee in the senior position must bring this to the attention of his or her line manager. The Fund shall separate individuals covered by this provision.

1.14 Collections and Harambee

- 1.14.1** A Fund employee shall not:
- a) Use his/her office or place of work as a venue for soliciting or collecting Harambee;
 - b) Either as a collector or a promoter of collection of Harambee, obtain money or other property from a person by using his/her official position in any way to exert pressure;
 - c) Preside at a Harambee, or play a central role in the organization of a Harambee, or appear as a guest of honour at a Harambee; and
 - d) Participate at a Harambee in such a way as to reflect adversely on his integrity or impartiality or interfere with the performance of his or her duties.

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1.15 Care of Fund Property

1.15.1 An employee of NSSF shall take all reasonable steps to ensure that Fund property in the officer's custody, possession or control is effectively taken care of and is in good repair and condition.

1.15.2 An employee of NSSF shall not use public property, funds or services that are acquired in the course of or as a result of the official duties for activities that are not related to the official work of NSSF.

1.15.3 An employee of NSSF shall return to the Fund all the public property in their custody, possession or control at the end of the appointment period.

1.15.4 An employee of NSSF shall be personally liable for any loss or damage to the Fund property.

1.15.5 Employees shall utilize the information, communications and technology (ICT) systems in a responsible manner and for the intended use. Incidental personal use must not interfere with the operation of ICT resources, burden the Fund with costs, and interfere with the user's employment or other obligations to the Fund.


1.15.6 Fund stationery is solely provided for official use. Use of Fund stationery for personal or other correspondence is therefore prohibited.

1.15.7 Recycling of stationery and printing on both sides of the paper is highly encouraged.

1.16 Misuse of Official Information

1.16.1 An employee of NSSF shall not directly or indirectly use or allow any person under the officer's authority to use any information obtained through or in connection with the office, which is not available in the public domain for furthering any private interest, whether financial or otherwise.

1.16.2 Employees are not permitted to divulge insider information in their possession to third parties or use that information for their own advantage. This includes communications with persons having a close personal relationship with Fund employees.

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1.16.3 An employee of NSSF shall not violate the requirements of subsection (2.16.1), if the information is to be used for the purposes of:

- a) Furthering the interests of the Fund;
- b) Educational, research, literary, scientific or other purposes not prohibited by law.

1.17 Political Neutrality

1.17.1 An employee of NSSF, shall not in the performance of his/her duties:

- a) Act as an agent for, or further the interests of a political party or candidate in an election; or
- b) Manifest support for or opposition to any political party or candidate in an election.

1.17.2 Engage in any political activity that may compromise or be seen to compromise the political neutrality of the office subject to any laws relating to elections.

1.17.3 Employees shall be impartial in the discharge of their duties whatever their political affiliation or inclination.


1.17.4 Employees may become members of a political party but will not be allowed to take active part in politics by virtue of his/her membership of a political party or to hold a post within the party.

1.17.5 A Fund employee may not adorn himself with symbols or clothing associated with a political party during official working hours. Use of the Fund's resources to advance any political cause or view is also prohibited.

1.17.6 An employee is entitled to his own views in political matters, and is permitted to express those views publicly provided such opinions are not expressed in a disruptive or offensive manner. Making speeches, propaganda or joining in a demonstration in favour of any political cause is prohibited within the Fund's premises or anywhere else during official working hours.

1.18 Giving of Advice

An employee of NSSF who has a duty to give advice shall give accurate, honest and impartial advice without fear or favor.

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1.19 Gainful Employment

1.19.1 An employee of NSSF shall not participate in any other gainful employment.

1.19.2 “Gainful Employment” means work that a person can pursue and perform for money or other form of compensation or remuneration which is inherently incompatible with the responsibilities of the employee at NSSF or which results in the impairment of the judgement of the employee in the execution of the functions of NSSF or results in a conflict of interest.

1.20 Offers of Future Employment

1.20.1 An employee of NSSF shall not allow himself or herself to be influenced in the performance of their duties by plans or expectations for offers of future employment or benefits.

1.20.2 An employee of NSSF shall disclose in writing to the Fund all offers of future employment or benefits that may place him/her in a situation of a conflict of interest.

1.21 Misleading the Public

1.21.1 An employee of NSSF shall not knowingly give false or misleading information to any person.

1.22 Falsification of Records


1.22.1 The Fund employees shall maintain all books, records and accounts in reasonable detail and in accordance with generally accepted accounting principles (GAAP) in order to accurately reflect all the Fund transactions.

1.22.2 The Fund employees must not, under any circumstance, engage in inaccurate, false or misleading record keeping.

1.22.3 No employee shall enter false or artificial entries in the books and records of the Fund.

1.23 Conduct in Public and Private

1.23.1 The Fund employees shall conduct themselves with dignity and decorum in both public and private to maintain public confidence in the integrity of the office.

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1.24 Work Place Harassment

1.24.1 A Fund employee shall not bully, belittle, abuse or demonstrate unwelcome behavior to colleagues, customers or other members of the public.

1.24.2 A Fund employee shall not send harassing /bullying/ offensive suggestive texts, pictures or videos to colleagues, customers or other members of the public.

1.25 Sexual Harassment


1.25.1 A Fund employee shall not sexually harass fellow colleagues or members of the public. Sexually harassing behavior may include, but not limited to:

- a) Demand for sexual favors in exchange for or threat of withdrawal of employment;
- b) Unwanted flirtation;
- c) Intentional physical contacts that are sexual in nature;
- d) Sexual propositions, making gestures, noises, advances or sexist jokes or anecdotes or comments that are insulting;
- e) Sending sexually suggestive texts, pictures or videos;
- f) Demeaning or derogatory behavior towards a person because of gender which is either obviously offensive or continue after the speaker is informed that those comments have caused offence.

1.26 Acting Through Others

1.26.1 An employee of NSSF shall not:

- a) Cause anything to be done through another person that would constitute a contravention of this Code, the Constitution or any other law if done by the employee; or
- b) Allow or direct a person under their supervision or control to act in contravention of this Code, the Constitution or any other law.
- c) Subsection 2.26.1(b) shall not apply where any action is taken without the employee's knowledge or consent or the employee has taken reasonable steps to prevent it.
- d) An employee of NSSF who acts under an unlawful direction shall be responsible for his or her actions.

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1.27 Reporting Improper Orders

1.27.1 If an employee of NSSF considers that anything required of them is in contravention of the Code, is otherwise improper or unethical, the employee shall report the matter to the supervisor, head of division/department, HRM, MIA&R, ME&I, MT/CEO or the Chairman, Internal Audit and Risk Committee of the Board.

1.27.2 The Fund shall expeditiously investigate the allegations and take appropriate action within 120 days of receiving the report.

1.28 Duty to Report and no Retaliation for Reporting

1.28.1 As part of its commitment to integrity and ethical behavior, employees are required to report to the relevant officers any actual or apparent violations of the Code so that they can be investigated and dealt with appropriately. Any employee aware of a violation of the Leadership and Integrity Code owes a duty to the Fund and himself to disclose or report it.

1.28.2 The Board is committed to addressing employees' concerns and seeks to foster openness with employees about ethical and integrity issues. The Fund encourages all employees to report wrongdoing and to ask questions if they have any concerns about compliance with this Code.


1.28.3 Discrimination or retaliation against any person who, in good faith, reports any matter under this Code will be unacceptable, although coming forward will not necessarily immunize a person from the consequences of his or her own misconduct, if any.

1.29 Reporting/Complaint Procedure

1.29.1 Any violations of this Code shall be reported to the supervisor, line manager, HRM, MIA&R, ME&I, Managing Trustee/CEO or any other designated officer.

1.29.2 Employees may also report any suspicious matter bordering on corruption through the whistle-blower boxes provided within the Fund or to Ethics & Anti-Corruption Commission (EACC) by going to their website – www.eacc.go.ke. This may be done in a confidential or at their choice on anonymous basis.

1.29.3 Information disclosed during the course of the investigation will remain confidential, except as necessary to conduct the investigation and take any remedial action.

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1.29.4 The Fund shall cooperate fully with the appropriate authorities, where laws have been violated.

1.30 Obedience to Lawful Instructions

1.30.1 Employees must obey lawful instructions of those placed in authority over them. They may, however, point out to such persons any conflict between such instructions and the Fund’s procedures, systems and policies.

1.31 Confidentiality

1.31.1 An employee of NSSF shall not disclose or cause to be disclosed any information in his custody to any unauthorized person.

1.32 Duty to Prevent Occurrence of Corruption/Unethical Practice in the Fund

1.32.1 An employee of NSSF who believes or has reason to believe that a corrupt act or unethical malpractice has occurred or is about to occur in the Fund, shall take all necessary measures to prevent it from continuing or materializing, in addition to any other appropriate action.


1.33 Promotion of Ethics, Integrity and Best Practices in the Fund

1.33.1 Employees in the Fund shall collectively and individually take measures to ensure that staff of the Fund uphold and practice the highest attainable degree of integrity in the performance of their duties.

1.33.2 The Fund shall promote knowledge sharing on ethics, integrity and leadership acquired over many years to facilitate efficient achievement of the vision and mission of the organization.

1.34 Dress Code

1.34.1 The Fund employees must at all times be suitably and neatly dressed as set out in the Human Resource Manual with a view to presenting a courteous, smart and efficient image to the public/customers. Putting on of provocative attire, accessories not regarded as suitable for the working environment is forbidden.

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1.35 Implementation of the Code

1.35.1 The Manager, Ethics & Integrity shall be responsible for ensuring full implementation of this Code. To facilitate the implementation of the Code, M, E&I shall organize awareness creation to both employees and other key Fund stakeholders.

1.35.2 To facilitate implementation of the Code, all employees shall

1.35.3 read and sign an acknowledgment form as a commitment to adhere to the Code.

1.36 Review

1.36.1 The Code shall be reviewed at such intervals as the Fund may determine.


1.37 Penalties for the Breach of the Code

1.37.1 Any employee found to have breached the Leadership and Integrity Code shall be dealt with in accordance with the Human Resource Manual. It is therefore important that all employees read and understand the Code before appending their signatures.

1.37.2 Any person may lodge a complaint alleging a breach of this Code by an employee of NSSF to the relevant authorities.


1.37.3 At the close of investigation, the Fraud Prevention & Disciplinary Committee (FP&DC) shall take appropriate disciplinary action against the employee including referring the case to other relevant bodies such as the EACC, the Ombudsman and Directorate of Criminal Investigations (DCI) among others. It should be noted that, employees in grades 4 and above are appointed by the Board and therefore disciplinary processes shall be instituted by the Board of Trustees.

1.37.4 A person dissatisfied with the decision of the FP&DC may appeal to the Managing Trustee/CEO who shall refer it to the appeal mechanism of the Fund within fifteen (15) days. The Appeals Committee of the Fund shall hear and determine the Case in ninety (90) days.

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2.0 Business Continuity

In the event of a disruption of business activities, the Manager Ethics & Integrity Department, shall invoke the Business Continuity Plan SF/E&I/BCP/01 to ensure continuity of business operations.

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Appendix1: NSSF Leadership & Integrity Code Acknowledgment Form

I.....P/No.....


DepartmentJob Title.....

have received, read and understood the NSSF Leadership and Integrity Code dated September 2020. I agree to comply with this Code at all times during my employment with the Fund. I understand that my failure to comply with these requirements may result in penalties as provided for in the Human Resource Manual.

Signed.....

Date.....

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Appendix 2: Register of Gifts Received

Name of Entity:

Serial No.	Name of the officer receiving the gift	ID/P No	Name of entity and officer giving the gift	Description of the gift	Estimated market value of the gift	Date of receipt the gift	Occasion or function in which the gift is offered	Date of declaration of the gift	Date of surrender of the gift to the public entity (where applicable)	Any other relevant information
1.										


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Appendix 3: Register of Gifts Given

Name of Entity:

Item No.	Name of the officer giving the gift on behalf of the entity	Name of officer given the gift	Designation of the officer given the gift	Description of the gift	Estimated market value of the gift	Date of giving the gift	Occasion or function in which the gift is given	Any other relevant information
1.								

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Appendix 4: Register of Conflict of Interest

Serial No.	Name and address of the officer making the declaration	ID/PP No. of the officer making declaration	Registrable interest	Nature of Conflict	Date of Declaration	Name & signature of person making entry	Remarks or Directions issued	Date	Update of registered interests