



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

Account reporting year 2024

KIRKENS NØDHJELP/ NORWEGIAN CHURCH AID



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SUSTAINABLE 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 (UNGP) and OECD's Guidelines for Multinational Enterprises. This applies to enterprises, the public sector, and organisations.

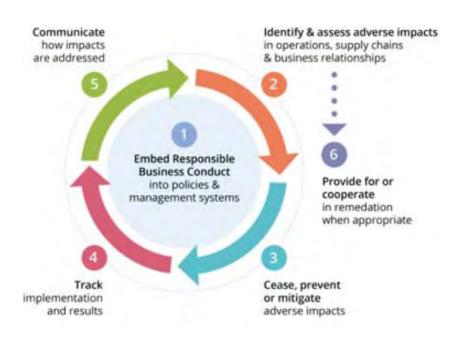
Ethical Trade Norway's Declaration of Principles (our Code of Conduct) for Responsible Business Conduct covers the areas of decent work, human rights, environment/climate, anti-corruption, and animal welfare. This report is done in full transparency and in line with UNGP and OECD's guidelines. The reports 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 the 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 one main area of our work is with the extractive sector. The mining industry in southern Africa for example has, over the years, made a fortune extracting minerals. Meanwhile communities have seen few of these financial gains and have been burdened with challenges such as the pollution of soil, water and air from toxic waste. As a result, communities in resource extraction areas have suffered from significant health problems and 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"

Arne Næss-Holm Interim Secretary General

Board Signature

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Marit Long Marit Long (Jun 13, 2025 13:23 GMT+2) Marit Long

Kjetil Fretheim Kjetil Fretheim (Jun 11, 2025 13:14 GMT+2)

Board member

Kjetil Fretheim Board member

Eirik Hjort Kirkerud Eirik Hjort Kirkerud (Jun 13, 2025 13:26 GMT+2) Eirik Hjort Kirkerud

Board member employee elected

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Vegard Kolbjørnsrud Deputy chair of the Board

Juliet Young Board member

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Silje Margrete Ander Board member employee elected

Arne Næss-Holm Arne Næss-Holm (Jun 13, 2025 13:29 GMT+2

Arne Næss-Holm Interim Secretary General

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Herborg Finnset Board member

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Birgitte Moe Olsen Board member

Anna Strandences

Strandenæs (Jun 11, 2025 07:50 Anna Strandenæs Board member

Marte Hansen Haugan

Marte Hansen Haugan Board member, Changemaker leader



A locally led initiative in northern Lebanon tackles solid waste efficiently and sustainably. Photo: Håvard Bjelland/Norwegian Church Aid

Enterprise information and enterprise context

Key information

Enterprise name: KIRKENS NØDHJELP/ NORWEGIAN CHURCH AID

Head office address: Bernhard Getz Gate 3, 0165 Oslo, Norway

Main brands, products and services offered by NCA:

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

Turnover in reporting year 2024 (NOK): 1,372,000,000

Number of employees per 31.12.2024: 918

The enterprise is covered by the Transparency Act

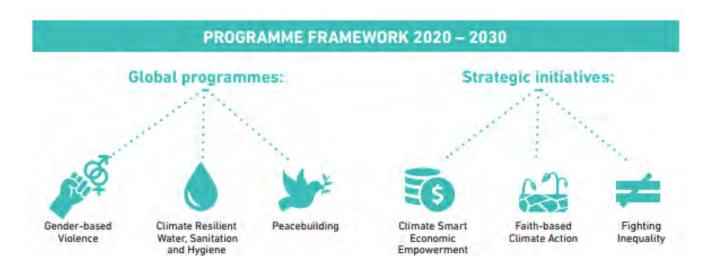
NCA's structure:

NCA is an ecumenical diaconal organisation headquartered in Oslo with offices in 23 countries and humanitarian operations in 17 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.

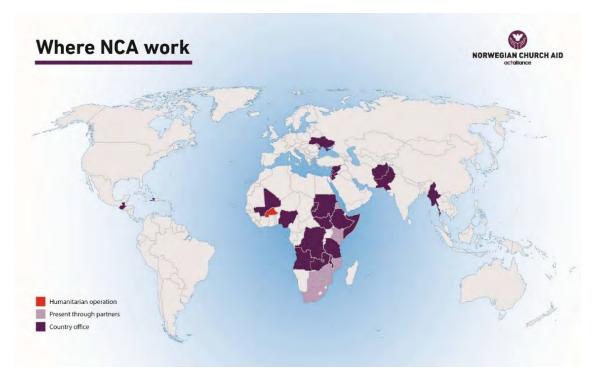
Arne Næss-Holm is the Interim Secretary General of Norwegian Church Aid, appointed by the Board of Directors.

NCA is anchored in and mandated by a communion of churches and Christian organisations in Norway. As owners and constituent organisations they form the Council, which is the highest governing body in NCA. NCA is accountable to its constituency and their appointed representatives.



NCA has programmes in the following countries as of 31.12.2024:

Afghanistan, Angola, Democratic Republic of Congo, Eastern Africa (Regional Office in Nairobi), Ethiopia, Guatemala, Haiti, Iraq, Lebanon, Malawi, Sahel, Myanmar, Nigeria, Pakistan, Palestine, Somalia, Southern Africa, South Sudan, Sudan, Syria, Tanzania, Ukraine and Zambia.



Major changes to the enterprise since last and current reporting period:

In 2024 NCA updated the Global Strategy "Faith in Action" and the Programme Framework for the period 2025 to 2030. NCA has three long-term goals: To save lives, to build resilience, and to seek justice, which together define NCA's work towards a more just world. Integrated in our ambitions is our focus on environmental sustainability in the years to come.

All NCA programmes are built around three long-term goals:

• **Save Lives:** Ensuring vulnerable and displaced people have access to life-saving services, protection and skills that enhance their safety, health and well-being.

• **Build Resilience:** Empowering inclusive and cohesive communities to withstand and recover from crises, manage resources sustainably and lift themselves out of poverty.

• Seek Justice: Enabling civil society actors to hold decision-makers accountable, influence policies and advocate for a more equitable distribution of resources.

Supply chain information

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.

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.

With activity in more than 30 countries, we have relationships with various local, regional and international suppliers and with local partner-organisations that use their own suppliers.

The supply chain in humanitarian organisations differs greatly from the private sector. The available funds are to a high degree linked to projects with a limited timeframe. Long term agreements with suppliers are not incentivized by the funding structure.

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

We have identified five significant risks of adverse impacts in relation to programs that we will focus on improving. Safety in the workplace and for the community, sexual harassment and exploitation, corruption, and low wages. Concerning environmental issues including health and safety, waste management and greenhouse gas emissions are risk areas we have chosen to focus on. Currently, the risks prioritised are based on NCA implemented programs, since these are salient risks that are possible to influence moving forward.

To fight poverty, we must reduce the gap between rich and poor. To reduce inequality, NCA and partners advocate for increased financing of the SDGs and universal social protection. We want to fight corruption and illicit financial flows and to hold duty bearers accountable for securing that public resources are redistributed in a fair and equitable way. NCA works to strengthen civil society and engage faith actors to hold duty bearers accountable through our Fighting Inequality programme.



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/sites/default/files/2025-04/Policy%20on%20Responsible%20Business%202025_0.pdf

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

Accountability is central to NCA's values and the principles that inform our work. As an organisation certified towards the Core Humanitarian Standard (CHS), we have committed to improve the quality and effectiveness of our work and maintain internationally recognised standards of accountability towards the people and communities that we assist. The standards and commitments of the CHS apply to all NCA departments and alignment to them should be evident in all policies, routines, guidelines, and practices. This also includes a commitment to train, support and monitor our partners' progress on the CHS.

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 rightsholders, 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 must 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 complaint 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: <u>Complaints Handling Mechanism</u> www.kirkensnodhjelp.no/en

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 Legal and Compliance Division 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 must 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: People and communities in situations of crisis and vulnerability:

- 1. Can exercise their rights and participate in actions and decisions that affect them.
- 2. Access timely and effective support in accordance with their specific needs and priorities.
- 3. Are better prepared and more resilient to potential crises.
- 4. Access support that does not cause harm to people or the environment.
- 5. Can safely report concerns and complaints and get them addressed.
- 6. Access coordinated and complementary support.
- 7. Access support that is continually adapted and improved based on feedback and learning.
- 8. Interact with staff and volunteers that are respectful, competent and well-managed.
- 9. Can expect that resources are managed ethically and responsibly.

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. <u>https://www.climate-charter.org/</u>

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 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 2026.

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 Secretary General 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 2024 has been "An environmentally sustainable NCA":

By 31 December 2024, 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 must sign that they certify and attest compliance with the Code of Conduct for Contractors to be eligible. See <u>For Contractors</u>

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

For our main product categories, we have developed a "green specifications catalogue" that specifically relates 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?

Anti-Corruption

Learning and transparency are vital parts of the fight against corruption. To avoid that the same mistakes and 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: <u>https://www.kirkensnodhjelp.no/en/node/1422</u>



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 based on 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.

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

Salient issue: Sexual harassment, exploitation and abuse

Related topic: Harsh and inhumane treatment **Geography:** Afghanistan, Angola, Burkina Faso, DR Congo, Ethiopia, Lebanon, Mali, Malawi, Mozambique, Nigeria, Pakistan, Sudan, Somalia, South Sudan and Syria

Salient issue: Corruption Related topic: Corruption Geography: Global

Salient issue: Waste

Related topic: Waste, Use of materials Geography: Afghanistan, Angola, Burkina Faso, DR Congo, Ethiopia, Lebanon, Mali, Malawi, Nigeria, Norway, Pakistan, Sudan, Somalia, South Sudan, Syria and Zambia

Salient issue: Greenhouse gas emissions Related topic: Greenhouse gas emission, Energy Geography: 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 prioritized in this period. b) any parts of the business that are not covered in the survey (product groups, own products, departments or similar) and why c) how information was obtained, which sources were used and which stakeholders are involved d) whether areas have been identified where there is a lack of information to assess risk and how you will proceed to obtain more information about this

a) the enterprise's routines for mapping and identifying risk and show how the negative impact was identified and prioritized in this period: As mentioned, NCA operates in 23 different countries, and often buys supplies and services locally. Therefore, it is essential to map out which risks are prominent in each country and take that into consideration in further work. When we identify potential negative impacts, we assess across the operation, relationships and partners, and supply chains, for adverse impacts caused by, contributed to, and directly linked to NCA operations. During the process of mapping out potential risks, we categorize the risks into 1) specific countries 2) suppliers and procurements and 3) programs as Figure 3 below illustrates.

RISK CATEGORIES	Countries	Suppliers and procurements	Programs
WHAT ARE WE LOOKING FOR?	Identify countries that NCA operates in with high risk of violations	Identify suppliers and procurements with risk	Identify programs or activities in relation to NCA that represents risk
V		Largest procurement categories Known risks in the supply chain	
WHERE TO FIND	ITUC	ETHICAL TRADE SALIENT RISK TOOL	INTERNAL WORKSHOP
INFORMATION?	GLOBAL SLAVERY INDEX	CSR RISK CHECK	COLLABORATE WITH PARTNERORGANIZATIONS
V	TRANSPARENCY INTERNATIONAL CORRUPTION PERCEPTION INDEX	DFØ	INVOLVE STAKEHOLDERS
	CIVICUS MONITOR		
	ENVIRONMENTAL PERFORMANCE INDEX		miro

b) any parts of the business that are not covered in the survey (product groups, own products, departments or similar) and why: Multinational enterprises that for example deliver computers or vehicles to NCA have not been considered since our influence is minimal.

c) how information was obtained, which sources were used and which stakeholders are involved:

- 1) We have assessed risks related to the specific countries by using these global sources:
- ITUC International Trade Union Confederation (ITUC): Annual Survey of Violations of Trade Union Rights
- Transparency International: Corruption Perception Index
- Global slavery index: Estimated vulnerability for modern slavery per country.

- 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.
- Environmental Performance Index: Rank countries in terms of protection of human health and protection of ecosystems.
- 2) 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.
- 3) 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. In 2024 we have developed a new Digital Procurement Process Tool that will give better insight into our global procurements.

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.

Why waste it When you car compost it.



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 part of a training with logisticians from all NCA country offices in 2024. A new project monitoring tool that was developed in 2023/2024 will be rolled out in 2025.

Goals in reporting year: The roll out of the joint project monitoring tool in all Country Offices.

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 rolled out in 2025. 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 harassment, exploitation and abuse by suppliers and by our partner suppliers.

Status: This topic was part of a training with logisticians from all NCA country offices in 2024. The new project monitoring tool that was developed in 2023/2024 will be rolled out in 2025.

Goals in reporting year: The roll out of the joint project monitoring tool in all Country Offices improving 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 new project monitoring tool will be rolled out in 2025. 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 organisation'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 complaint handling system in place, but we need a better software.

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 remined.

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 2025 we will focus additional attention on learning from previous corruption cases. A Learning and Improvement Project has been started in 2025. We will continue 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.

As part of our ongoing efforts to strengthen our complaint-handling processes, we are planning to buy a new and better software solution that enables employees and external stakeholders to report incidents confidentially and securely.

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) projects follows the Sphere standards which include mitigation measures related to solid waste and wastewater management.
- Waste 4 Value project under the Climate Smart Economic Empowerment (CSEE) thematic area in Gambella, Ethiopia.
- NCA country offices report on the management of their office waste through the Country Environment Checklist

Goals in reporting year:

- Revision of NCA global programme framework and technical guidance notes to reflect the Climate & Environment Charter Commitments, integrating Disaster Risk Management, community resilience, environmental sustainability, and "Do No Harm" in all global programmes and strategic initiatives.
- Develop sustainable procurement guidelines
- Build Country Office capacity to conduct project level environmental assessments.

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+ have been conducted throughout 2024 and have reached 89 participants, from NCA and its implementing partners in Country. In 2025, several new projects are expected to be informed by a NEAT+ assessment and include environmental indicators in their result frameworks.

- NCA has secured funding to scale up the Waste-4-Value project in Ethiopia, Pakistan and Tanzania. The project was piloted in Gambella refugee camp in partnership with a local recycling company. The Waste-4-Value aims to reduce plastic, paper, and other recyclable solid waste that pollute the environment through Youth engagement, strengthening existing waste collectors' enterprises, and environment-friendly interventions and advocacy. The project is also part of NCA Climate Action: 242 tons of plastic waste has already been collected across 12 projects in 2023, saving about 70 tons of CO2e by reducing open dumping and burning of waste in favour of recycling.
- 13 out of 17 Country Offices have responded to the annual survey at the date of this report. The survey has been updated in 2024, providing a list of hazardous material, including ewaste. Previous results might have reflected insufficient knowledge on what constitutes hazardous waste rather than actual good waste management practices. While continuing efforts towards better managing non-hazardous waste, NCA's ambitions is to increase awareness around hazardous waste fractions accumulated in its field locations, sometimes over more than a decade.

Number of NCA staff members trained in NEAT+

2024: 87	
2023: 2	
2022: 0	

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

100% of respondents	45%	33%
2024	2023	2022

NCA offices that divert organic waste for some type of composting

69% of respondents	48%	24%
2024	2023	2022

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

31% of respondents	72%	59%
2024	2023	2022

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

38% of respondents	75%	57%
2024	2023	2022

Salient issue: Greenhouse gas emissions

Goal: Mitigation of greenhouse gas emissions

Status: NCA's approach aligns with that of the Aid sector and follows the GHG Protocol, a recognised international standard. The Humanitarian Carbon Calculator (HCC) was developed to help signatories of the Charter, under the umbrella of the Sustainable Supply Chain Alliance, a collaborative project led by the ICRC.

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

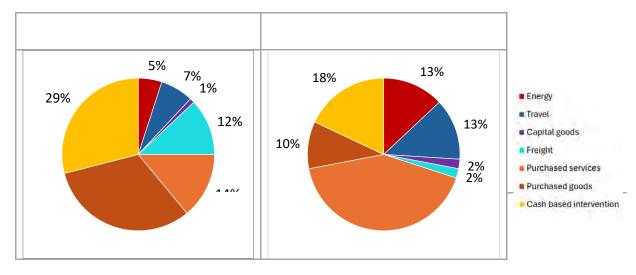
In 2024, NCA conducted its first complete analysis of greenhouse gas emissions for the reporting year 2023.

For 2023, the completeness score is of 30% due to missing or partial data from fugitive emissions, electricity consumption, waste, freight, employee commuting and use of distributed items. The quality score is 60%, considering the accuracy of reported activities but also the certainty level of emission factors used in the calculation.

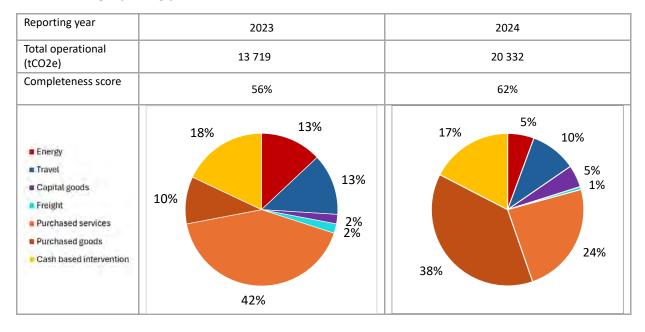
NCA's total carbon footprint amounts to <u>24 510 tons of CO2 equivalents</u>. Projects implemented through <u>partners represent 44% of NCA's emissions</u>.

The <u>13 700 tons of CO2e from NCA operations</u> can be broken down following the main categories of the HCC.

NCA's emissions have a slightly different profile than the Aid sector's that were mapped by the Climate Action Accelerator in 2022, as shown in the below charts. This is partly due to differences in calculations. For instance, some of our "Freight" emissions have been included in the "Purchased services" category.



2024 goals included continues focus on energy management in NCA's offices and improve the data quality to calculate greenhouse gas emissions.



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

Partners do not currently report GHG emissions to NCA. Going forward, we will continue to make estimations based on financial transfers. Although not setting quantitative requirements, NCA strives to raise awareness among its partners to reflect on their own climate and environmental strategies and mobilise them to take climate action themselves.

Energy is an important category. Although not the largest share of emissions, we have a more direct way to reduce emissions. Country Offices have multiplied efforts toward energy efficiency and the transition to renewable sources. A global training on energy efficiency has been conducted in 2024 and the facility management checklist has been developed and included in NCA's Country Office manual to support continuous improvement.

Projects implemented in 2023 are proving successful to reduce the use of diesel generators:

- NIGERIA Maiduguri guesthouse off-grid PV solar system with Lithium batteries -70%
- AFGHANISTAN Kabul guesthouse Back-up PV solar with Lead-Acid batteries and solar water heaters -50%
- ZAMBIA back-up battery for Lusaka office -75%

Savings on fuel and maintenance enable rapid payback of the original investment in Solar equipment. Solar projects have also helped stabilise the power supply. With fewer power outages, working and living conditions have improved, particularly in field locations.

In 2024, four more Country Offices have installed alternatives to their generators:

- SOUTH-SUDAN Juba office back-up PV solar and Off-grid systems in field locations.
- BURKINA Ouagadougou office Stand-alone Lithium battery-pack 40kWh capacity.
- SUDAN Port Sudan office 36 PV panels and 240 kWh capacity Lithium battery-pack
- PAKISTAN Islamabad office 40 PV panels with grid-tied inverter and smart meter.

In 2025, scale up projects will continue to be implemented, for instance in MALAWI.

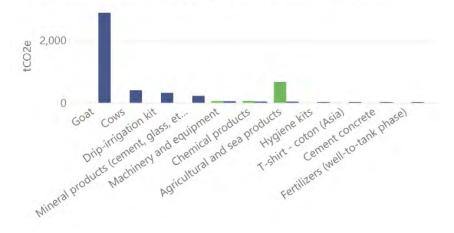
Travel represents about 13% of emissions. This category includes business travel (flights, taxi, car rentals, bus, train, etc.) but also employee commutes. The main source of emission in this category is air travel. Other transportation modes and commuting represent a much smaller portion of emissions and have not been measured globally nor with great accuracy.

NCA has pledged to reduce emissions from International Air travel by 25% compared to 2019 by the end of 2025. To reach this goal and keep air travel emissions at their lowest without impacting program implementation, we must pursue efforts to travel responsibly by questioning the need to travel, making the most of digital solutions, choosing more direct routes, planning, combining, etc.

Capital goods (vehicles, computers, furniture and other office equipment) account for 2% of emissions. Mitigation measures for this category include good maintenance, repair and refurbishing, only buying what is necessary and using green procurement criteria.

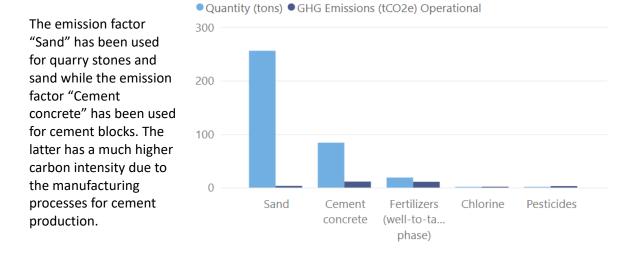
Supply chain and cash-based interventions, although the largest, this category of emissions is the most difficult to assess with accuracy. In 2023, calculations were based on expenditure in our accounting system, leading to high level of uncertainty. To improve accuracy but most importantly be able to identify reduction levers, we have chosen to use a sample of the actual quantities for goods and materials or distances for transportation. The sample data has been provided by our Malawi office that implements projects to support food security under NCA's Climate Smart Economic Empowerment programme. The financial data tends to underestimate emissions for this type of projects, particularly from the procurement of humanitarian products.

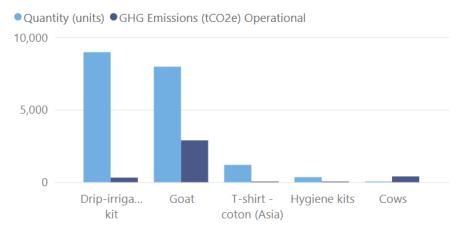
	Operational method	Monetary method
Total GHG emissions in tCO2e	5 937	1 399
Uncertainty	19%	34%



The monetary method uses mainly one emission factor (EF) "Agricultural and sea products" while the operational method allows to go into the detail of livestock, construction materials, fertilisers, etc.

● GHG Emissions (tCO2e) Financial ● GHG Emissions (tCO2e) Operational





Similarly, the carbon intensity of cows is much higher than for goats. More than 7000 goats and 50 cows have been distributed under the NANSEN fund to support global food security following the war in Ukraine.

Deeper understanding of emissions will help to inform project design and procurement choices to reduce greenhouse gas emissions.

NCA strives to procure locally but looking for environmentally sustainable options, engage suppliers, manufacturers and retailers in the transition, collaborate with logistics clusters and advocate for donors to cover additional costs if necessary.

Moving forward, we aim to develop new reduction targets by identifying more feasible actions and evaluating their potential carbon savings.

Our journey towards reducing our carbon footprint is ongoing. We encourage everyone in our organization to integrate environmental considerations into their work. By doing so, we can collectively make a meaningful impact and contribute to a more sustainable future.

GHG emissions from air travel in tCO2e



NCA offices that monitor fuel consumption from vehicles and generators



NCA offices that have routines for energy management

92% of respondents (13/17 Country Offices)	75%	68%
2024	2023	2022

3.B Other actions related to management of negative impacts

3.B.1 Reduction of nature- and environment impact and **3.B.2** Reduction of greenhouse gas emissions

The renovation of our Head Office Building has had a positive impact on water and electricity consumption. The building has received a new energy label, going from D to C. Electricity consumption has been reduced by 18% compared to 2019 despite the exceptionally cold month of January.

3.B.3 Adapting own purchasing practices

The Global Logistics Unit in cooperation with two country offices has developed a Digital Procurement Process System that will be rolled out in 2025.

3.B.4 Choice of products and certifications

At the Head Office NCA only chooses office supplies that are eco-labeled.

3.B.5 Contribution to development, capacity building and training internally and of suppliers and workers in the supply chain

3.B.6 Combatting corruption and bribery in own enterprise and supply chain.

NCA has a strict zero-tolerance policy toward corruption and embezzlement. All identified cases of corruption or misuse of funds are publicly disclosed on our website https://www.kirkensnodhjelp.no/en/node/1422

3.B.7 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

Freedom of association and the right to collective bargaining is part of our contracts. Except for Malawi, Zambia and Kenya the countries where we work score very low on the Freedom of Association Index. We address workers' rights in our Fighting Inequality Programme, as described in the results case from Malawi on page 38.



FIGHTING INEQUALITY (FI)

The strategic initiative's ambitions align with SDGs 1, 10 and 16.

In 2024 rights-holders were mobilised in Malawi, Zambia, DRC, and through Regional Southern Africa Advocacy Programme (ROSA).

Through training, men, women and youth have been equipped to identify and report corrupt practices in resource extraction, as well as advocate for their own rights.

NCA, together with partners, works to mobilise finances for development, achieving a more equitable distribution of public resources, accountable budget management and just resource governance.

In 2024, the UN General Assembly approved the Terms of Reference for a global tax convention, paving the way for formal negotiations to begin in 2025. This marks a significant step forward in the fight for global tax justice, a cause long championed by civil society and NCA across different departments.

Under the FI global outcome to increase finances for and spending to reduce poverty and inequality, NCA supported the attendance of a delegation of faith leaders from **Zambia**, **Tanzania**, **Mauritius** and **Namibia** to attend the Pan-African Conference 2024. The PAC 2024 demonstrated a growing momentum for reforms, including advocacy for a UN Tax Convention and stronger African Union engagement on tax justice.

In parallel, NCA has strengthened national engagement on tax justice. In **Tanzania**, NCA relaunched their UN Tax Convention campaign, which was supported with the release of a policy brief highlighting the country's significant revenue losses. The campaign brought together key stakeholders to advance the national dialogue on tax justice.

The Alternative Mining Indaba (AMI) remains a vital platform for rights-holder engagement. In 2024, **Namibia** hosted its first-ever AMI, with NCA contributing insights from Norway's natural resource management experience. The event had a tangible impact: input from NCA was used in parliamentary submissions, and Namibian MPs referenced AMI discussions in their debates on mining and extractive industries. Similarly, following AMI Cape Town, NCA **Zambia** was invited to contribute to Zambia's critical minerals strategy. These follow-ups highlight how engagement in AMIs extends beyond rights-holders' interactions with duty-bearers, influencing national dialogue and policymaking.



Bishop Nelson Kisare of the Mennonite Church of Tanzania is one of the religious leader champion on Taxation. He is chairman of the Interfaith Standing Committee on Economic Justice and Integrity of Creation (ISCEJIC), a Tanzania's Interfaith alliance made of the National Muslim Council, Tanzania Episcopal Conference and the Christian Council of Tanzania. Photo: Nizar Seleman Utanga/ Norwegian Church Aid, Tanzania





Demonstrations during AMI. Photo: Silje Ander/ Norwegian Church Aid

OUR MINERAL RESOURCES

OUR FUTURE!

Da



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 by the Sustainable NCA working group, which is a cross departmental group of experts in environmental sustainability.



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 strict zero-tolerance policy toward corruption and embezzlement. All identified cases of corruption or misuse of funds are publicly disclosed on our website https://www.kirkensnodhjelp.no/en/node/1422

To reinforce transparency and accountability, we publish an annual anti-corruption report detailing our efforts and preventive measures.

We have established a comprehensive complaints mechanism integrated throughout our organisation. This system addresses misconduct, inappropriate behaviour, financial irregularities, and other concerns. The complaints mechanism is actively communicated to our employees, partners, suppliers, and local communities, enabling all stakeholders to report concerns securely and confidentially. Furthermore, NCA proactively informs donors and other affected parties about any suspected or confirmed financial irregularities related to our projects.

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

Norwegian Church Aid publicly communicates its identification and management of negative impacts through multiple channels. Our Annual Reports submitted to Ethical Trade Norway are available on both our website (<u>Accountability</u>) and through Ethical Trade Norway's platform, providing comprehensive details on our ethical and sustainable practices. Additionally, our website's dedicated anti-corruption section (<u>Anti-corruption</u>) is regularly updated, showcasing our ongoing efforts and initiatives against corruption and misconduct. We also publish a carbon account in this Report, highlighting our environmental impact and strategies implemented to minimize harm.

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

NCA recieves noumerous inquiries from private persons, organisations, press and private donors. We strive to answer them within 24 hours. Longer financial or programmatic inquiries may take up to three weeks. Norwegian Church Aid has clear and effective routines for managing and responding to external inquiries concerning transparency requirements. Inquiries can be directed via email to <u>nca-oslo@nca.no</u>, <u>presse@nca.no</u>, <u>giver@kirkensnodhjelp.no</u>, or through a dedicated 24-hour press number specifically for media requests. Additionally, our service centre actively handles external queries from stakeholders.

Our communications department takes primary responsibility for processing and responding to external inquiries, collaborating closely with relevant internal departments and Country Offices to ensure accurate and comprehensive responses. NCA monitors all interactions on our social media platforms, responding promptly and appropriately to queries and comments to maintain openness and strengthen stakeholder trust. Our country offices are required to follow our global communications policies and adhere to transparency.



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 enteprise'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 labour 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 complaints 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 complaints 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, manage risks, improve security and generally improve the quality of our deliveries.

RESULTS CASE

ADVOCACY BRINGS JUSTICE TO MINING COMMUNITIES IN MALAWI

DAC SECTOR: 151.60 Human Rights

WHAT: Conditions have improved in Karonga, Malawi, after NCA and partners advocated tirelessly for the mining company to adhere to labour laws and respect human rights. As a result, miners working in the Lisikwa Coal Mine now earn the minimum wage. The company constructed a school building and a clinic to improve access to education and health. A miner received compensation after a work-related injury that paralysed him.

WHY: Extractive industries often harm workers and local communities rather than promoting inclusive growth, as seen in the Lisikwa coal mine. Driven by poverty, miners work with minimal protective gear, long days without breaks. They face high risks for little pay. If they don't deliver 35 wheelbarrow loads, their wages are slashed. Mr. Kayange, employed at the coal mine, faced unsafe conditions after multiple closures due to inadequate safety measures. During one of these dangerous shifts, a rockfall caused the mine shaft to collapse, leaving him permanently paralysed and unable to provide for his family.

HOW: During project monitoring visits in Karonga in 2021, NCA and its partner Catholic Commission for Justice and Peace (CCJP) identified several issues, including low wages, lack of protective gear and instances of gender-based violence. NCA documented the situation of the injured mine worker. When CCJP later engaged the mining company requesting compensation for the worker, the company declined to take responsibility. CCJP then reported the case to the Malawi Human Rights Commission (MHRC). MHRC began investigations, and their report received media attention in Times^{*}, a major media outlet in Malawi. NCA and CCJP organised multiple visits to Karonga, resulting in further media attention on human rights violations in mining areas.

CCJP, as a faith-based organisation, received high trust from the community and mine workers, resulting in more cases being reported to them rather than to the police, labour office, or courts. It mobilised rights-holders and established mining committees trained in human rights, corporate social responsibility and workers' rights. Miners were encouraged to advocate for their rights and organise for better working conditions. NCA and CCJP facilitated the dialogue between the company and the miners. This collective effort prompted the coal mine to improve practices towards the miners and the community. They compensated the injured mine worker, provided protective equipment, and raised salaries to minimum standards. Other companies in Malawi have followed suit, making similar improvements.

PARTNER: Catholic Commission for Justice and Peace (CCJP)

LESSONS LEARNED:

- Mobilising different types of stakeholders, such as mining communities, media, and the MHRC, increases pressure on mining companies.
- CCJP's faith-based role fostered community trust, aiding their work.
- Publishing evidence influenced the mining company to change its practices.
- High GBV rates in mining areas led to increased integration with the GBV and Economic Development and Food Security programmes from 2025.

SOURCES: CCJP activity reports, NCA reports, articles from the NCA Magazine and Times*



The mines are dangerous places to work. In only a few seconds, Gresswell Kayange (39) went from being a strong family man to becoming paralysed for life. Photo: Håvard Bjelland/Norwegian Church Aid

^{*} https://times.mw/probe-exposes-abuse-in-mines

Together with partner organisations NCA works 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 on environmental and human rights. Mining in Karonga, Malawi. Photo: Håvard Bjelland/Norwegian Church Aid

Contact details:

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2024_NCA_Transparency Act_sign

Final Audit Report

2025-06-13

Created:	2025-06-10
Ву:	Johanne Rygh (johanne.rygh@nca.no)
Status:	Signed
Transaction ID:	CBJCHBCAABAAmfze3blqTRK6zGiOIFH2zeoRO_ZmMu5G

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