



CODE OF ETHICS

Note: This document is an extract from the official internal documents of SmartUp – Social Innovation Lab, as approved by the Executive Board. It reproduces selected provisions verbatim and does not constitute the complete document. Provisions relating solely to internal procedures have been omitted. Where provisions from more than one source document are combined, each part is identified by its source.

Source documents: SmartUp Employee Handbook (2026).

From: SmartUp Employee Handbook (2026) – Code of Ethics: principles, integrity, confidentiality and data protection

Code of Ethics

SmartUp – Social Innovation Lab conducts all its activities in a manner that upholds the highest standards of integrity, professionalism, and accountability. All employees, consultants, interns, and other engaged personnel are expected to act ethically, responsibly, and in the best interest of the organization, its partners, donors, and the communities it serves.

SmartUp is committed to honesty, fairness, respect, responsibility, and sound judgment in all internal and external interactions. Employees are expected to perform their duties with due care, impartiality, and professionalism, and to comply with all applicable laws, internal policies, and donor requirements.

Employees must not knowingly misrepresent the organization, its work, or its partners, and may speak on behalf of SmartUp only when duly authorized. Any form of unethical conduct, abuse of position, or misuse of organizational resources is strictly prohibited.

All ethical obligations outlined in this Handbook include strict adherence to SmartUp’s Child Safeguarding Policy, which is mandatory for all personnel.

Integrity and Accountability

All staff members must:

- Perform their duties honestly, responsibly, and in good faith;
- Act in the best interest of SmartUp at all times;
- Avoid any action that could compromise the organization’s credibility or independence;
- Ensure that all information, reports, records, and communications are accurate, complete, and truthful.

The misuse of SmartUp’s resources, authority, or position for personal benefit or for the benefit of third parties is strictly prohibited.

Confidentiality and Data Protection

Employees are required to protect confidential, sensitive, and proprietary information obtained through their work with SmartUp. This includes, but is not limited to:

- Personal data of employees, partners, beneficiaries, and participants;

- Financial, contractual, and donor-related information;
- Internal documents, strategies, and non-public communications.

Confidential information must be accessed and shared strictly on a need-to-know basis and handled in accordance with applicable data protection laws, donor requirements, and SmartUp's internal rules. Employees must not disclose confidential information to unauthorized persons during or after their engagement with SmartUp.

From: SmartUp Employee Handbook (2026) – Code of Ethics: Professional Conduct and Respect

Professional Conduct and Respect

All employees are expected to treat colleagues, partners, beneficiaries, and stakeholders with respect, dignity, and fairness.

SmartUp does not tolerate:

- Discrimination, harassment, abuse, or exploitation;
- Intimidation, retaliation, or inappropriate behavior;
- Any conduct that creates a hostile or unsafe working environment.

Professional behavior is required in all work-related interactions, whether in person, online, or during field activities.

From: SmartUp Employee Handbook (2026) – Code of Ethics: Consequences of Non-Compliance

Consequences of Non-Compliance

Failure to comply with this Code of Ethics and related sections may constitute a breach of the employment contract and may result in disciplinary measures, up to and including termination, in accordance with applicable laws and SmartUp's internal procedures.

Reports may be submitted to a supervisor, the Administration Team, the President, or directly to the Executive Board at board@innovationlab.mk