



**Global
Communities**

Standards of Conduct

Updated 2022

If you want to submit an inquiry or complaint to the Office of Ethics, please contact the Global Communities Chief Ethics Officer, Eric O'Neill, at ethics@globalcommunities.org or (+1) 301-200-8539.

Table of Contents

Letter from the President and CEO	3
Letter from the Chief Ethics Officer.....	4
Global Communities Mission, Vision, Values & Community Commitments	5
Our Values.....	5
Our Community Commitments.....	5
Introduction	6
Applicability	6
Accountability.....	6
Availability.....	7
Our Partner Communities.....	7
Our Employees	7
Our Partners and Donors.....	7
Your Rights as an Employee of Global Communities	8
1. Compliance with the Law / Whistle Blower Policy	8
1.1 Management Responsibility.....	8
1.2 Complaint Procedure	8
1.3 Investigation and Corrective Action	9
1.4 Accountabilities and Responsibilities	9
2. Policy of Equal Opportunity and Anti-Discrimination	9
3. No Harassment.....	10
3.1 Policy of Anti-Harassment.....	10
3.2 Sexual Harassment.....	11
Supervisor Responsibilities.....	12
Your Duties as an Employee of Global Communities	12
4. Your Personal Conduct.....	12
4.1 Unacceptable Behavior	12
4.2 Drug-Free Workplace.....	13
4.3 Workplace Violence	13
4.4 Media Inquiries and Public Communications.....	13
5. Avoid Conflicts of Interest.....	14

5.1	Outside Work.....	14
5.2	Gifts, Gratuities, Meals, Entertainment and Other Business Courtesies.....	15
5.3	Accepting Business Courtesies.....	15
5.4	Offering Business Courtesies to Non-Government Personnel.....	16
5.5	Offering Gratuities to United States Government Personnel.....	16
5.6	Political Contributions and Activities.....	17
6.	Respectful Business Communications.....	17
6.1	Electronic Communications.....	17
6.2	Reporting and Recording Information.....	18
7.	Protect Global Communities’ Confidential and Proprietary Information.....	18
8.	Fraternization.....	19
	Your Duties to Our Clients and Those We Serve.....	20
9.	Know Global Communities Safeguarding Framework.....	20
9.1	Safeguarding Children and Adults at Risk.....	20
9.2	Prevention of Sexual Exploitation, Abuse, and Harassment (PSEAH).....	21
9.3	Anti-Trafficking.....	21
10.	Know the Foreign Corrupt Practices Act Policy.....	22
	Standards of Conduct Acknowledgment Form.....	24

Letter from the President and CEO



Dear Global Communities Colleagues,

Every day, we work side-by-side with communities in more than 30 countries around the world as they build healthy, resilient lives and livelihoods. This community-led approach has defined Global Communities since our founding more than 60 years ago, and our longstanding commitment to our values and standards is reflected in these Standards of Conduct. We can only achieve our bold mission to save lives, advance equity, and secure strong futures if we uphold the highest of ethical standards, conduct and behavior.

I ask that you take the time to thoroughly read our Standards of Conduct and discuss them with your coworkers. While they cannot address every situation, the principles, policies, and procedures explained in this document will help us to fully live our values and safeguard the health and wellbeing of the communities with whom we work. These standards form the foundation for our commitment to an inclusive workplace and describe the behaviors we hope will characterize a Global Communities employee. These standards are designed to ensure that through our work, and through our engagement with others, we honor the dignity and common humanity of all people, starting with ourselves and each other.

We are truly a global community, and that means recognizing that our diversity is our strength. Equity and inclusion are not just buzzwords to me – they are the means by which we ensure that every person we encounter through our work is treated with the respect and dignity they deserve.

We are proud to share this document not only with our global team, but with partners, donors, and stakeholders around the world. As part of our commitment to transparency and mutual accountability, we are open about what matters to us and the principles that guide the work we do and how we do it together. Please know you can bring any questions or concerns to the Office of Ethics, your supervisor, or your People & Culture representative.

I personally hope and expect that each of us will embrace the spirit of this document every single day as we work together to promote the highest standards of ethics, integrity, and respect in order to advance our mission and work toward the future we envision.

With warmest regards,

A handwritten signature in cursive script that reads "Carrie Hessler-Radelet".

Carrie Hessler-Radelet
President and CEO

Letter from the Chief Ethics Officer



Dear Global Communities Family,

The Global Communities Standards of Conduct illustrate our goal to act ethically, honestly and with transparency. Global Communities is committed to building an environment where our employees feel valued and respected for their uniqueness, differences, and contributions toward a better world. Our work in improving the lives of others may pose complex questions that require challenging answers. These Standards of Conduct should assist you in holding our ethical standards to something greater than following the letter of the law. Our goal is to make decisions that achieve the greater good in a manner that makes us proud.

Global Communities' work in international development, financial inclusion and humanitarian assistance requires idealism and concern for others in concert with practical decision making within challenging and time-sensitive circumstances. Applying our Standards of Conduct and values statements maintains our commitment to integrity and furthers our strategic goals.

These Standards of Conduct apply to all employees worldwide, the Board of Trustees, consultants, interns, authorized representatives, and all others acting on behalf of Global Communities. All Global Communities employees and representatives are responsible for upholding our Standards of Conduct and for making decisions with integrity. The Standards of Conduct are organized in three main categories: 1) Global Communities' responsibilities to its employees, 2) our responsibilities to Global Communities and 3) our responsibilities to our clients and partner communities. However, no ethics policy can cover every single circumstance that might arise. Please use this document as a guide to act in an ethical way, but also supplement it with your best judgment.

Our Standards of Conduct are available in seven languages. We hope that this will encourage unified work to advance Global Communities' mission and strategic goals around the world. While they cannot address every situation, the Office of Ethics is here to help you along the way. Please bring any questions or concerns to the Office of Ethics, your supervisor, your People & Culture representative or via our anonymous reporting hotline.

Regards,

Eric M. O'Neill
Vice President, Chief Ethics Officer and General Counsel

Global Communities Mission, Vision, Values & Community Commitments

You play a very important role in bringing our mission, vision, values, and community commitments alive. Your efforts to achieve program goals and serve local communities are at the core of what we do. This requires that we strive to achieve high standards of ethics and accountability to each other and on behalf of those we serve.

Our Vision and Mission	
Our Vision	A more just, prosperous, and equitable global community.
Our Mission	We bring together local ingenuity and global insights to save lives, advance equity, and secure strong futures.
Our Values	
Dignity	We respect the dignity and humanity of every individual and are committed to equity, inclusion, and justice in everything we do.
Integrity	We consistently hold ourselves and each other to delivering excellence and to the highest professional and ethical standards.
Humility	We are transparent when we make mistakes, trust the wisdom of the communities we serve and seek to preserve the natural environment.
Connection	We actively collaborate with all our stakeholders to improve understanding of complex issues and catalyze lasting change.
Creativity	We are curious, seek to innovate, and embrace a spirit of experimentation.
Our Community Commitments	
<ol style="list-style-type: none"> 1. I commit to treat colleagues with kindness and respect that accords each person dignity. 2. I honor each person in their uniqueness, including their gender, race, ethnicity, religion, national origin, sexual orientation, age, and disability. 3. I commit to honest and transparent communication and trust others to do the same. 4. I foster collaborative relationships through curiosity, active listening, empathy and valuing all voices. 5. I commit to uphold our Values and Code of Conduct and trust colleagues share these commitments. 	

Introduction

The success of Global Communities is directly related to the trust and confidence we earn from and instill in our employees, donors, and others with whom we do business. Our values and standards are intrinsic to our longstanding success because they inspire trust and credibility on the local communities we serve and the businesses and donors that we partner with. These core values inspire our employees worldwide to be part of the Global Communities family. At Global Communities, we are committed to providing an ethical work environment where everyone feels valued and respected for their uniqueness, differences, and contributions toward a better world.

We believe that embracing diversity, equity, and inclusion as part of our organizational mission is a way to intentionally make space for diversity of thought, perspectives, and life experiences. Our commitment extends across borders and throughout our work around the globe. Diversity, equity, and inclusion are central to our mission, vision, and values and to our global impact. We know that having varied perspectives helps generate better ideas to solve the complex problems of a changing and increasingly diverse global environment.

Applicability

The Standards of Conduct apply to all Global Communities employees worldwide, members of Global Communities' Board of Trustees, consultants, interns, and volunteers (hereinafter referred to as "staff"); and to sub-recipients, partner organizations, contractors, consultants, agents, representatives, vendors, and any other organization or individual that acts on behalf of Global Communities or at the direction of Global Communities (hereinafter referred to as "partners").

In the event of a conflict between the Standards of Conduct and the Field Finance and Accounting Manual (FFAM), the FFAM shall control.



If you have any questions regarding these Standards of Conduct or are uncertain about appropriate conduct, contact your supervisor, the Chief Ethics Officer, another appropriate member of management, or your People & Culture representative.

Accountability:

Global Communities expects all staff and partners to adhere to the highest standards of accountability, which requires honest and ethical conduct. All staff are responsible for understanding and following the policies and principles outlined in the Standards of Conduct. Violations of these Standards of Conduct may result in disciplinary action up to and including termination of employment.

Global Communities reserves the right to modify, amend, supplement, delete, or discontinue any of its policies at any time, with or without notice. Staff should be aware that there may be variations to Global Communities' policies to the extent necessary to comply with any applicable state, federal, or foreign laws and in meeting Global Communities' needs.

Availability

We, at Global Communities, believe that all of our stakeholders should be aware of our business practices.

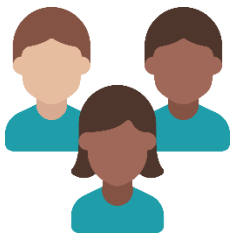
Our Standards of Conduct are publicly available and can be found on our website at:

www.globalcommunities.org



Our Partner Communities

Our business is to partner with communities around the world as they work to improve their lives and livelihoods. All our actions must be measured by our success to achieve this goal. We are dedicated to providing the highest level of excellence in each of the programs we implement. We strive to work together with local communities and governments to identify the most critical needs and find ways to address them together as we believe that the people best suited to decide what a community needs are the people of the community itself.



Our Employees

Our ability to achieve our goals lies in the expertise, imagination, flexibility, commitment, integrity, and teamwork of our staff. For this reason, we strive to create a work environment that is rewarding and fosters mutual respect, support, and teamwork. We aim to provide an atmosphere where highly talented and committed individuals can fulfill their potential. We believe that each one of us plays an essential part in creating a healthy environment that fosters trust and respect.



Our Partners and Donors

We are proud of our partnerships with governments, foundations, corporations, NGOs and, above all, the communities around the world with whom we work. We understand that our ability to conduct our work depends on our donors and partners who believe in what we do and, in our ability, to develop and implement high-quality and self-sustainable programs that impact the lives of thousands of people worldwide.

Your Rights as an Employee of Global Communities

1. Compliance with the Law / Whistle Blower Policy

All staff are required and expected to comply with all applicable governmental laws, rules, and regulations, as well as Global Communities' policies, including these Standards of Conduct. If you are unsure whether a contemplated action is permitted, you should consult with your supervisor, the Chief Ethics Officer, the Finance Department, or the People & Culture Department.

Although we hire staff with sound character and judgment, there may be times when we need to raise concerns about behavior that we believe violates Global Communities' values and standards. If you witness such behavior, you have an obligation to discuss it with the appropriate parties. Doing so will provide Global Communities with the opportunity to address the issue and solve the problem. The reporting process is flexible, allowing you to raise your concerns through different channels. On many occasions, your supervisor is the best starting point.

Global Communities prohibits any form of retaliation against staff who, in good faith, report to Global Communities any violations of these Standards of Conduct, or any conduct or activity that the staff member reasonably believes violates any law, rule, or regulation applicable to Global Communities, its operations or business, or any other suspected improper, unethical, or illegal conduct or activities, even if the conduct does not actually violate the law. Global Communities also prohibits any form of retaliation against any staff who provide information, cause information to be provided, or assist in an investigation conducted by Global Communities or any regulatory or law

enforcement agency or legislative body, or who participate or give testimony in any proceeding relating to an alleged violation of any law, rule, or regulation.

1.1 Management Responsibility

All supervisors are responsible for ensuring adherence to this no-retaliation policy. In addition, each supervisor is responsible for communicating this policy to staff under their supervision and for ensuring that staff complete the mandatory online annual ethics training that reinforces this policy.

Open communication between supervisors and employees is crucial to creating a safe work environment where employees are free to speak with any supervisor at any time about any matter that is important to them. Supervisors can foster open communication by:

- Regularly discussing the organization's values and standards during team meetings;
- Maintaining an "open door" policy; and
- Supporting employees who choose to consult other supervisors.

If any supervisor believes that a violation of this policy has occurred or receives a report of a violation, he or she must immediately follow the Complaint Procedure described in Section 1.2.

1.2 Complaint Procedure

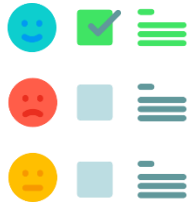
Any employee who believes that he or she has suffered or witnessed a violation of these Standards of Conduct should promptly contact his or her supervisor, the Chief Ethics Officer, the People & Culture



Department, or any Department Director or Vice President. You may also report violations anonymously by emailing the Chief Ethics Officer at ethics@globalcommunities.org or by submitting a report at www.lighthouse-services.com/globalcommunities. If an employee is based in a host country office, he or she may use any of the points of contact listed above, or may choose to report to their Country Director, Chief of Party, or host country People & Culture Department.

1.3 Investigation and Corrective Action

If you report behavior that is prohibited by these Standards of Conduct, Global Communities will conduct a prompt, thorough and discreet investigation and fair consideration will be given to all the facts presented. The investigation will be handled as confidentially as practicable and may include interviews with parties involved and others that may have relevant knowledge. All employees, including the person(s) making the complaint and the person(s) accused of engaging in misconduct may be asked to cooperate in the investigation by providing information and/or documents pertaining to the complaint. To ensure confidentiality, it is paramount that you practice discretion and refrain from discussing your complaint with colleagues.



If it is found from the investigation that the complaint is valid, depending on the nature of the violation, the offending individual can be subject to disciplinary action, up to and including termination of employment. Complaints that are false or malicious may result in disciplinary action against the person making the false complaint.

1.4 Accountabilities and Responsibilities

All staff are responsible for ensuring that they cooperate in the maintenance of a work environment which is free from discrimination, harassment, and retaliation.

Supervisors have a further responsibility to ensure that, when an instance of discrimination, harassment, or retaliation is brought to their attention, they take appropriate action to remedy the situation expeditiously. They must further ensure that they do not take any retaliatory action against employees who make complaints about the supervisor's conduct or behavior, whether such complaints are valid or not.

Q: I would like to raise a concern but would prefer to do it anonymously. Can I still contact the Office of Ethics?

A: Yes, you may remain anonymous if you choose to do so. Although we encourage you to identify yourself to facilitate communication, we realize you may not be comfortable doing so and respect your wishes. Should you choose to identify yourself, the Office of Ethics will make every effort to keep your identity confidential while conducting a thorough and fair investigation. To ensure confidentiality, it is paramount that you practice discretion and refrain from discussing the investigation with colleagues.

2. Policy of Equal Opportunity and Anti-Discrimination

Global Communities is an equal opportunity employer and complies with all applicable U.S. and host country employment laws. Global Communities is committed to providing a workplace that is free from unlawful discrimination. Specifically, Global Communities

strictly prohibits and does not tolerate discrimination based on race, age, color, religion, sex, marital status, sexual orientation, gender identity, national origin, pregnancy, disability, genetic information, or any other characteristic protected by law in all terms, conditions, and privileges of employment, including without limitation, recruiting, hiring, assignment, compensation, promotion, discipline, and termination. This policy covers conduct occurring at Global Communities' offices, workplaces, all work-related activities and virtually through Global Communities' electronic systems. Furthermore, this policy applies to all Global Communities personnel, regardless of position, title, salary, or years of service, including the uppermost members of Global Communities management.

Q: Is it acceptable to stipulate gender and age on a job advertisement?

A: No. There is no business justification for advertising a job based on gender or age. Our hiring practices should focus on selecting job applicants based on job-related criteria only.

3. No Harassment

3.1 Policy of Anti-Harassment

In accordance with all applicable state and federal laws of the United States, as well as any applicable host country laws, Global Communities is committed to providing a work environment free from harassment. Harassment includes any unwelcome verbal, physical, or visual conduct, based on a protected characteristic, that creates an intimidating, offensive, or hostile working



environment that unreasonably interferes with an individual's work performance or otherwise adversely affects an individual's employment opportunities.

Many forms of harassment violate the law. Unlawful harassing conduct includes, but is not limited to: slurs, epithets, derogatory comments, negative stereotyping, ethnic jokes, written or graphic materials displaying offensive objects, threatening, intimidating, or hostile acts that denigrate or show hostility or aversion towards an individual or group because of race, color, religion, national origin, age, sex, sexual orientation, ancestry, physical disability, mental disability, medical condition, marital status, family status, genetic information, and any other basis protected by applicable law.

But while not all forms of harassment necessarily constitute violations of the law, Global Communities considers harassment that is ongoing and pervasive such that it changes the work environment to be unprofessional and grounds for discipline, up to and including termination. Such harassment includes bullying, which is behavior or conduct that is directed at an individual or group and is offensive, intimidating, humiliating, or threatening, unwelcome, unsolicited, and unreasonable, and occurs over a substantial period of time. Please note that bad management does not in itself constitute harassment.

Examples include:

- Abusing or humiliating a person loudly, usually when others are present;
- Repeated threats of dismissal or other severe punishment for no reason;
- Constant ridicule and being put down;
- Leaving offensive messages on email or the telephone;

- Sabotaging a person’s work, for example, by deliberately withholding or supplying incorrect information, hiding documents or equipment, not passing on messages and otherwise impeding that person’s work;
- Maliciously excluding and isolating a person from workplace activities;
- Spreading gossip or false, malicious rumors about a person with an intent to cause the person harm.

Q: Can the Office of Ethics provide advice on how to handle delicate situations with my coworkers?

A: Yes. The Office of Ethics can certainly advise you confidentially and recommend ideas to handle delicate situations with colleagues. If you feel inclined to do so, you can also discuss the issue with your supervisor or the People & Culture Department.

3.2 Sexual Harassment

Sexual Harassment is defined as unsolicited and unwelcome sexual advances, requests for sexual acts or favors, or other physical, verbal, electronic conduct, or visual displays of a sexual nature when:

1. Submission to such conduct is made either explicitly or implicitly a term or condition of an individual’s employment (such as hiring, compensation, advancement, promotion, or retention);
2. Submission to or rejection of such conduct by an individual is used as a basis for making employment decisions concerning the individual (e.g., treating an employee favorably for engaging in such conduct or unfavorably for refusing to engage in the conduct); or

3. Such conduct has the purpose or effect of unreasonably interfering with an individual’s work performance or creating an intimidating, hostile, or offensive working environment.

Sexual harassment does not include non-offensive or occasional conduct of a socially acceptable nature. It refers to conduct which is unwelcome or offensive to the individual or harmful to morale. While generally it consists of repeated and/or persistent conduct, a single incident of sexually harassing behavior can be significant enough to be considered a violation, or that sexual harassment may be a pattern of conduct. It can range from subtle behavior to explicit demands for sexual activity or even criminal assault. The following behaviors are unacceptable, and therefore, prohibited:

- Inappropriate jokes or comments with sexual connotations;
- The display of sexually suggestive material;
- Stares and leers or sexually suggestive hand or body gestures;
- Comments and questions about another person’s sexual conduct and/or private relationships;
- Persistent and unwelcome advances, propositions, and/or requests for dates;
- Inappropriate written communications, via telephone (text messages), electronic mail, other computer system messages or social media platforms;
- Unnecessary close physical proximity including persistently following a person or blocking a person’s movements;
- Unwelcome physical contact such as kissing, hugging, brushing against or touching a person;

- Coerced sexual acts or other physical assaults or physical conduct of a sexual nature;
- Offering employment benefits in exchange for sexual favors;
- Making or threatening reprisals after a negative response to sexual advances;
- Denigrating comments regarding a person's gender or sexual preference;

Supervisor Responsibilities

Any supervisor who witnesses or learns of a possible violation of Global Communities' Sexual

Harassment policy has an obligation to immediately report the matter to the Headquarters People & Culture Department at employees@globalcommunities.org and the Office of Ethics at ethics@globalcommunities.org. If the supervisor is based in a host country office, the supervisor may report to the points of contact listed above, or may choose to report to the Country Director, Chief of Party, or host country People & Culture Department, who will in turn inform the Headquarters People & Culture Department and the Office of Ethics.

Your Duties as an Employee of Global Communities

4. Your Personal Conduct

Certain rules and regulations regarding staff behavior are necessary for the efficient operation of Global Communities and for the benefit and safety of all staff.

We are all expected to:

- Comply with all Global Communities policies;
- Wear professional attire appropriate for the cultural norms of the country where we work;
- Treat all persons with whom Global Communities does business, visitors, and fellow staff with dignity and respect; and
- Refrain from offensive behavior.

4.1 Unacceptable Behavior

We must all use our best professional judgment to conduct ourselves in an ethical and dignified manner. If you observe, become aware of, or are

subject to inappropriate behavior or conduct, this should be promptly reported to your supervisor or another member of management. Examples of improper conduct/unacceptable behavior include, but are not limited to:

- Violation of any of Global Communities' policies and procedures;
- Insubordination;
- Displays of disrespect toward fellow staff, visitors, or other persons;
- Theft, fraud, or other dishonesty;
- Falsification or allowing falsification of any program related records, employment records, or other records, including timekeeping records;
- Unauthorized use, removal or borrowing of Global Communities property, equipment, materials, or facilities;

- Engaging in criminal conduct;
- Disruptive behavior;
- Sleeping on the job;
- Acts or threats of violence in the workplace; and
- Procuring commercial sex acts.

If your supervisor is the person engaging in the inappropriate behavior or conduct, you should report him or her to the Office of Ethics, any member of management above your supervisor in Global Communities' chain of command, or the People & Culture Department.

4.2 Drug-Free Workplace

Global Communities is a drug-free workplace. Please refer to Global Communities' Drugs and Alcohol policy in the Policy Portal (U.S. Offices) and the Employee Manual (Host Country Offices), which all staff are expected to read, understand, and follow.

4.3 Workplace Violence

We do not tolerate workplace violence, threats, or intimidation against staff by anyone.

Acts or threats of physical violence include conduct that is sufficiently severe, offensive, or intimidating to make an employee feel uncomfortable in the workplace.

Examples of workplace violence include, but are not limited to the following:

- All threats or acts of violence occurring *on* Global Communities' premises, regardless of the relationship between Global Communities and the parties involved in the incident;
- All threats or acts of violence occurring *off* Global Communities' premises involving someone who is acting in the capacity of a representative of Global Communities;
- Hitting or shoving an individual;
- Carrying a weapon on Global Communities' property;
- Pointing a weapon at another employee regardless of whether that employee is located on Global Communities' property;
- Threatening an individual or his/her family, friends, associates, or property with harm;
- The intentional destruction or threat of destruction of property;
- Harassing or threatening phone calls; or
- Harassing surveillance or stalking.

Any act or threat of violence is serious. Any employee, who physically or verbally threatens, harasses, or abuses someone at or from the workplace, will be subject to corrective action up to and including termination. If you become aware of anyone violating this policy, you must report it immediately.

4.4 Media Inquiries and Public Communications

From time to time, you may be approached by the media. You must immediately report all media inquiries to the Headquarters Communications Department. Staff are not authorized to communicate with the media regarding Global Communities without the prior approval of the Communications Department. In Global Communities' field offices, it is the responsibility of the Country Representative to determine who within their staff is authorized to speak with local media, and to ensure that spokespersons have adequate training on how to represent Global Communities' programs. The Communications Department must be consulted in the case of sensitive or potentially negative media reporting.

Posts on social media should be considered public communications. Even with stringent

privacy settings, such communications can be easily copied and distributed. Staff represent Global Communities on social media as they do in person and should maintain professional behavior as it relates to Global Communities in their online presence.

For more information, please refer to **Global Communities’ Media Inquiries and Public Communications Policy in the Policy Portal (U.S. Offices) and Employee Manual (Host Country Offices)**.



5. Avoid Conflicts of Interest

A conflict of interest generally exists when a staff member has a direct or indirect personal interest in a transaction or situation that affects or appears to affect his or her judgment and divides his or her loyalties between two or more competing interests. A conflict of interest can arise when one takes action or has an interest that may make it difficult to perform his or her work objectively and effectively.

Staff must avoid having business, financial interests, non-monetary interests, relationships, or activities that could conflict with Global Communities, their ability to perform their job duties, or potentially might influence their decisions. We ask that you avoid even the appearance of a conflict of interest between your Global Communities duties and personal life.

While it is impossible to list every circumstance that may give rise to a conflict of interest, we

must avoid any action that might result in, or give the appearance of:

- Using Global Communities position for personal gain or for any reason other than the interests of Global Communities;
- Giving unwarranted preferential treatment to any outside person or entity;
- Using Global Communities property or information for personal gain; or
- Personally taking advantage of an opportunity that is discovered through your position with Global Communities.

Staff who negotiate or award contracts and grants or who can influence Global Communities business decisions must deal fairly and impartially. Our Field Finance and Accounting Manual provides the following guidance:

- An actual or potential conflict of interest exists when any action on the part of a Global Communities employee results in a direct financial advantage to the employee or to his/her spouse, parent, or child.
- No employee shall participate in the selection, final choice, or management of a contract if a real or apparent conflict of interest exists.
- Global Communities employees are not permitted to ask for or accept gratuities, favors, or anything of financial value from contractors, sub-recipients or others associated with project contractors.

Below are some additional guidelines to help us avoid conflicts of interest.

5.1 Outside Work

We generally discourage employees from working for Global Communities and another employer. We understand that there are some appropriate activities, such as teaching or speaking, that also

benefit Global Communities, but you must receive advance approval for outside paid employment. If hired through Headquarters, submit outside employment requests to the People & Culture Department. If hired locally, submit these requests to the Country Director, Chief of Party, or host country People & Culture Department.

Pre-existing Activities: Please disclose pre-existing work activities or investments that are in effect when offered a position of employment. If a potential or real conflict is discovered, we will work with you to address the conflict.

Volunteer Work: We encourage you to engage in volunteer work as long as it does not interfere with normal work responsibilities or appear to represent a conflict of interest. In foreign countries, we must avoid volunteer activity that is prohibited by the host government.

Q: I need to make extra money and was offered a second job. Is this a problem?

A: This may create a conflict of interest if your second job is similar to the work that you do for Global Communities, conflicts with Global Communities' interests or interferes with your job performance. Any paid outside work requires approval from Global Communities.

5.2 Gifts, Gratuities, Meals, Entertainment and Other Business Courtesies

We must avoid doing anything that may suggest that we sought, received, or gave any benefit in exchange for a business courtesy. A business courtesy is a present, gift, service, hospitality, or favor for which fair market value is not paid by the recipient, and includes gifts, gratuities, meals, refreshments, entertainment, honoraria, transportation, discounts, promotional items, use

of a person's time or skills, materials, facilities, equipment, or other benefits from persons or companies with whom Global Communities does or may do business.

Q: A vendor that is trying to do business with Global Communities has offered to cover my expenses to attend a training course out of town. Does this represent a conflict of interest?

A: Yes, this would represent a conflict of interest if the company is actively pursuing Global Communities as a client for their products and services.

5.3 Accepting Business Courtesies

Staff must never ask for business courtesies. You may accept, subject to the guidelines set forth herein, unsolicited business courtesies that promote successful working relationships and good will with vendors that Global Communities maintains or may establish a business relationship with. If you are involved in the awarding of contracts or the allocation of business (such as selecting a supplier), the prudent course is to refuse business courtesies.

You must report any excessive individual courtesies to your supervisor or the Chief Ethics Officer.

Meals and Entertainment: We are allowed to accept occasional meals, refreshments, entertainment, and similar minor business courtesies that are shared with the person who has offered to pay for the meal or entertainment provided that the courtesies:

- are not inappropriately lavish or excessive;

- are not frequent and do not reflect a pattern of frequent acceptance of courtesies from the same person or entity;
- do not create the appearance of an attempt to influence business decisions, such as accepting courtesies or entertainment from a vendor whose contract is expiring in the near future;
- would not make the staff member accepting the courtesies feel uncomfortable discussing them with his or her supervisor or coworkers or having the courtesies known to the public.

Gifts: Staff may accept nominal unsolicited gifts, other than money, including:

- flowers, fruit baskets and other modest presents that commemorate a special occasion;
- merchandise of nominal value, such as calendars, pens, mugs, caps, and t-shirts.



Staff may not accept compensation, honoraria, gift cards, or money of any amount from persons, companies, or other organizations with which Global Communities does or may do business.

If you believe that a supplier, vendor, or subcontractor seeks to provide a gift to obtain favorable treatment from Global Communities, you should report this conduct to your supervisor, who will seek the advice of the Chief Ethics Officer.

5.4 Offering Business Courtesies to Non-Government Personnel

We must make sure that if we offer a business courtesy to an outside party, it cannot reasonably be interpreted as an attempt to gain an unfair business advantage



or otherwise reflect negatively upon Global Communities. Staff may provide nominal non-monetary gifts (i.e., company logo apparel or similar promotional items) to our clients. Global Communities management must approve other business courtesies, including meals, refreshments or entertainment of reasonable value provided the business courtesy:

- does not violate any law or regulation or the Standards of Conduct of the recipient's organization;
- is infrequent in nature and is not lavish; and
- is properly reflected on the books and records of Global Communities.

5.5 Offering Gratuities to United States Government Personnel

It is a U.S. federal crime to give, offer or promise a bribe or gratuity to a U.S. public official. A gratuity is "anything of value" given, offered, or promised "for or because of any official act" performed or to be performed. The Federal Acquisition Regulation states that:

No government employee may solicit or accept, directly or indirectly, any gratuity, gift, favor, entertainment, loan, or anything of monetary value from anyone who (a) has or is seeking to obtain government business with the employee's agency, (b) conducts activities that are regulated by the employee's agency, or (c) has interests that may be substantially affected by the performance or nonperformance of the employee's official duties.

Staff may not provide gifts or gratuities to U.S. Government employees and must seek the advice of the Global Communities General Counsel prior to providing ANY business courtesies to U.S. Government employees.

5.6 Political Contributions and Activities

As a matter of policy, Global Communities will not make political contributions in foreign countries or in the United States.

Global Communities is a non-partisan and politically neutral organization that does not support or oppose any particular candidate or political party in any country in which we work. Staff cannot use Global Communities resources or work time to pursue political campaigns or to engage in political activities.

Staff wishing to run for any elected office must notify their supervisor and the Office of Ethics immediately. In most cases, staff must resign from their employment with Global Communities if they intend to run for elected office.



6. Respectful Business Communications

6.1 Electronic Communications

Global Communities encourages staff to make proper use of communication tools, such as email, internet, telephones and photocopiers.

Communication and information systems, including computers and mobile devices, are provided to staff to conduct Global Communities business and are valuable assets that must be protected by staff. All electronic communication and computer systems, including all information transmitted, received, or stored in these systems, are the property of Global Communities. When using Global Communities tools, we should all be

aware that Global Communities may exercise its right to monitor its electronic communications and computer systems at any time, with or without cause and without the permission of any employee.

Please note that the following are some examples of inappropriate use of the internet and email systems and therefore strictly forbidden at all times:

- Downloading or transmitting pornographic, sexist or racially or ethnically insensitive material.
- Posting your opinions or views regarding the organization or our business in internet newsgroups, chat rooms, blogs, or other social media, unless specifically authorized by Global Communities to do so.
- Conducting private commercial business on the internet or email systems.

Expectation of Professionalism in Using All Electronics

You are reminded to be courteous in your electronic communications and to always conduct yourself in a professional manner. Emails may be misdirected or forwarded and may be viewed by persons other than the intended recipient. Before you send an email, ask yourself "is this something I would want a lawyer to review?"



Offensive and Inappropriate Behavior

Global Communities policies against discrimination, harassment (sexual or otherwise),

and retaliation apply fully to Global Communities' computer systems. Therefore, no email messages should be created, sent, or received if they violate those policies. Any violation of those policies is grounds for corrective action up to and including termination.

Q: Does Global Communities actively monitor internet access or employee email?

A: Global Communities may access its communication systems for many reasons. Staff in our IT Department may access email during normal system maintenance, network administration or problem solving. Also, as part of standard computer systems administration, where allowed by law, Global Communities maintains logs of internet usage activity, which authorized personnel may use to investigate performance concerns, security incidents (virus attacks, network intrusions, for example) or for other business purposes.

Q: Can I check the weather on the internet with my computer?

A: Limited personal use of our systems is allowed if conforming to the Standards of Conduct. We rely on you to act professionally and use good judgment when using Global Communities communication systems.

6.2 Reporting and Recording Information

It is your responsibility to make certain that the statements and representations you make to anyone with whom Global Communities conducts business are truthful and accurate. **All information reported in time and attendance records, vehicle usage logs, and reports submitted to donors**

must contain complete and accurate information.

Because even a minor error can affect the truthfulness of a record, you must report all errors, regardless of their size or how long ago they might have occurred. **There are no exceptions to this rule.**

7. Protect Global Communities' Confidential and Proprietary Information

Our business success relies on the protection of Global Communities' most important information, as well as information shared with Global Communities by program participants and other business partners. "Confidential Information" shall mean all confidential, proprietary, or sensitive information that is not general knowledge about Global Communities or that concerns Global Communities' program participants, employees, donors, grantors, or other individuals or organizations associated with Global Communities. Such information may include, but is not limited, to any and all technical and non-technical information of Global Communities, trade secrets, know-how, processes, software programs, financial information, procurement requirements, business and contractual relationships, business forecasts, marketing plans, and information specific to programs, including proposals, bid information, strategy and security and risk management decisions.

We are strictly prohibited from disclosing Confidential Information without a valid business purpose and proper authorization. Additionally, we should not disclose such information to other staff that do not have a need to know it.

When working with confidential information that you can touch (such as documents, drawings, pictures, graphics, software, hardware, graphs, or charts), we must make sure that the Confidential

Information is labeled as “Confidential and Proprietary to Global Communities.” Marking information as confidential and proprietary is one of the most effective ways to protect Global Communities’ intellectual property.

We must also be careful not to be overheard when discussing confidential matters. Be particularly mindful in elevators, restaurants, airplanes, restrooms, or other public areas. We must also be careful while speaking about business with family members or friends because even innocent conversations may lead to accidental public disclosure of Confidential Information. We should be particularly vigilant when making presentations to ensure that they do not inappropriately contain Confidential Information.

The obligation to preserve Confidential Information, whether of Global Communities or another party, continues even after your employment ends.

Q: During my commute to the office on public transportation, I sometimes make work-related calls. Is this a problem?

A: You must be careful not to discuss non-public company information in public places, such as in taxis, public transportation, elevators or at conferences. When necessary to make a phone call in a public place, be aware of your surroundings.

If, during your employment, you receive any request to disclose Confidential Information, notify your supervisor and the Legal Department immediately. If you receive such a request after your employment with Global Communities has ended, you are required to contact the Legal Department.

8. Fraternization

Global Communities believes that a harmonious workplace is one where staff are clear about how to manage personal boundaries and relationships in the work environment. We encourage staff to form productive and professional bonds with one another. However, there are certain boundaries that must be observed. This policy establishes disclosure requirements for all **close personal relationships** between employees, including supervisory staff, to assist in the prevention of real or perceived conflicts of interest and abuse of power, and to maintain a productive and friendly work environment. Employees in supervisory or other influential roles are subject to more stringent requirements. Global Communities does not intend this policy to otherwise discourage friendship or consensual social activities among Global Communities employees.

A **close personal relationship** exists when a Global Communities staff member is dating, having romantic exchanges, or sexual relations with another staff. Staff are expected to adhere to the following requirements:

1. Staff cannot supervise, directly or indirectly, anyone with whom they share a close personal relationship.
2. Staff cannot participate in the recruitment, selection, compensation, or promotion of anyone with whom they are having a close personal relationship.
3. Staff cannot participate in the selection or supervision of vendors, consultants, or other companies doing business with Global Communities if they have a close personal relationship with them.
4. Staff who have a close personal relationship prohibited by this policy or are contemplating one, are required to notify their supervisor immediately. Where

a close personal relationship prohibited by this policy exists, Global Communities will take whatever action it believes is necessary to remove the parties from any continued supervisory lines of authority between them or any other situation that is potentially damaging, at Global Communities' discretion.

5. All staff must disclose the existence of any personal relationship with another employee that has progressed beyond a

platonic friendship, even if there is no line of authority or reporting involved.

6. Disclosure must be made using Global Communities' Employee Consensual Romantic Relationship Disclosure Statement and given to the immediate supervisor and to the People & Culture Department. You can request a copy of the Disclosure Statement from your People & Culture Department.

Your Duties to Our Clients and Those We Serve

9. Know Global Communities Safeguarding Framework

Global Communities is committed to ensuring a safe and respectful environment for all staff, program participants, and anyone with whom Global Communities interacts worldwide. Global Communities' Safeguarding Framework consists of six (6) policies and six (6) procedures that outline appropriate behavioral expectations for Global Communities' staff and partners.

The Safeguarding Framework applies to all Global Communities staff and partners worldwide. All Global Communities staff and partners must abide by the policies in the Safeguarding Framework at all times.

For more information, please refer to [Global Communities' Safeguarding Framework](#).

Below we highlight three (3) policies from the Safeguarding Framework that describe our duties to our program participants and partner communities.

9.1 Safeguarding Children and Adults at Risk

Global Communities staff and partners may not behave in an abusive or exploitative manner by exerting power and authority over children or adults at risk or by creating an unsafe environment.

Global Communities staff and partners must:

- Never engage in any unacceptable sexual activity with children or adults at risk.
- Never engage in any other exploitative behavior (e.g., hire children or adults at risk for domestic or other labor; or use their status or position to intimidate, bully, threaten, discriminate against, embarrass, shame, humiliate, coerce, or undermine children or adults at risk).
- Never engage in other abusive or negligent behavior (e.g., beat or hit a child or adult at risk as a form of discipline; or leave a child

unsupervised as this may put the child at risk of harm or injury).

9.2 Prevention of Sexual Exploitation, Abuse, and Harassment (PSEAH)

All Global Communities staff and partners are expected to always uphold the highest standards of personal and professional conduct. Global Communities has zero tolerance for any abuse of power and violations of this policy by Global Communities staff will be cause for disciplinary action, including termination of employment. The PSEAH Behavior Standards below specify appropriate behavior required of staff and partners during their association with Global Communities in any capacity, in or out of work hours, in any location, including while working for, or on behalf of, Global Communities:

1. Sexual exploitation and abuse by humanitarian workers constitute acts of gross misconduct and are therefore grounds for termination of employment.
2. Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is not a defense.
3. Exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior is prohibited. This includes exchange of assistance due to program participants.
4. Any sexual relationship between those providing assistance and protection, and a person benefiting from such assistance and protection that involves improper use of rank or position, is prohibited. Such relationships undermine the credibility and integrity of our work.

5. Where a worker develops concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, they must report such concerns via established reporting mechanisms.
6. All employees must contribute to an environment that does not tolerate SEAH and impart upon supervisors at all levels additional requirements to support and develop systems that maintain this environment.

Any breach of the PSEAH Behavior Standards will result in consequences for Global Communities' staff and partners, and will vary depending on the relationship to Global Communities and the nature of the breach, but could include:

- A confidential internal or external investigation and possible suspension or change in duties during the investigation;
- Disciplinary action or immediate dismissal and reporting according to local mandatory reporting regulations;
- Suspension and/or ceasing of activity, relationship, or engagement; or
- Cancellation of the contract or partnership.

9.3 Anti-Trafficking

Global Communities has zero tolerance regarding trafficking in persons. Global Communities staff, sub-awardees, or contractors (at any tier) or their employees, labor recruiters, brokers, or other agents, shall not engage in any of the following prohibited activities:

- Trafficking in persons (defined as the recruitment, transportation, transfer, harboring, or receipt of persons, by means of threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of

payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labor or services, slavery, or practices similar to slavery, servitude, or the removal of organs. The consent of a victim of trafficking in persons to the intended exploitation shall be irrelevant where any of the means set forth above have been used);

- Procurement of commercial sex acts;
- Use forced labor in the performance of an award;
- Directly support or advance trafficking in persons, including:
- Destroying, concealing, confiscating, or otherwise denying access by an employee to the employee's identity or immigration documents.
- Failing to provide return transportation or pay for return transportation costs to an employee from a country outside the United States to the country from which the employee was recruited upon the end of employment if requested by the employee.
- Soliciting a person for the purposes of employment, or offering employment, by means of materially false or fraudulent pretenses, representations, or promises regarding that employment;
- Charging employees recruitment fees; or
- Providing or arranging housing that fails to meet the host country housing and safety standards.

Violations of this policy may be reported anonymously by emailing the Chief Ethics Officer at ethics@globalcommunities.org or by

submitting a report at: www.lighthouse-services.com/globalcommunities. In addition, complaints of violations can also be made to the USAID Global Human Trafficking Hotline at 1-844-888-FREE and its email address at help@befree.org.

10. Know the Foreign Corrupt Practices Act Policy

Laws of the United States (or the host country when overseas) must be obeyed at all times. In particular, Global Communities Staff are subject to the Foreign Corrupt Practices Act, 15 U.S.C. 78dd-1 (FCPA). Global Communities expects its staff, agents, partners, and other representatives to operate in a fashion consistent with this law. Violation of the FCPA is grounds for immediate dismissal.

In general, the FCPA forbids payments, favors, and offers of payment/favors to foreign officials, foreign political parties, or candidates for political office in a foreign country in order to gain any competitive advantage over other parties in the award of government business, licensing, or other exercise of government discretion. In other words, staff cannot give anything of value to a foreign government official. In addition, indirect payments made through any third party, such as through consultants, subrecipients, subcontractors, are also prohibited.

Some facilitating payments to government agencies may be acceptable if the payment is required as a normal course of business, is not open to change or discretion by a government official (i.e., a non-discretionary administrative processing fee), and meets all policies in the Field Finance and Accounting Manual. An expedited passport fee is an example of an allowed facilitation payment.

In addition, once it is determined that a given payment is permissible under the FCPA, it is

mandatory and critical that Global Communities documents the payment, the purpose of the payment, and the due diligence Global Communities exercised prior to making that payment. It is therefore incumbent upon every Global Communities employee to comply with Global Communities' accounting policies and internal control procedures even where the proposed payment is deemed proper under the FCPA.

If doubt exists as to the legality under the FCPA of any planned payment to a foreign government official, the matter should be referred to the Legal Department immediately. No payment should be made until the Legal Department provides guidance on how to proceed.

In short, it is the duty of every Global Communities employee and anyone acting on behalf of Global Communities to:

- Comply with Global Communities procedures and the laws of the United States and the

foreign country in which Global Communities conducts business;

- Refrain from making any illegal payment, regardless of amount, to a foreign government official, political party officials, or any other prohibited person;
- Refrain from using Global Communities assets for any illegal or unethical purpose;
- Refrain from creating or maintaining secret funds or assets for any purpose;
- Adhere to Global Communities accounting policies and internal controls;
- Refrain from making false or misleading entries in Global Communities records or making any payment on behalf of Global Communities without adequate supporting documentation; and
- Report all violations of Global Communities financial and accounting policies to the Chief Financial Officer.

Standards of Conduct Acknowledgment Form

I have carefully read Global Communities' Standards of Conduct and I understand its provisions.

I accept responsibility for adhering to the principles and policies contained in the Standards of Conduct and understand and agree that any violations of the principles and policies can lead to disciplinary action up to and including termination of employment.

Signature: _____

Date: _____

Name (Printed): _____