



**Global
Communities**
Partners for Good



Global Communities Standards of Conduct

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 301-587-4700 (x1822).

TABLE OF CONTENTS

Letter from the President and CEO	3	6. Avoid Conflicts of Interest	13
Letter from the Chief Ethics Officer	4	6.1 Outside Work	14
Introduction	5	6.2 Gifts, Gratuities, Meals, Entertainment and Other Business Courtesies	14
YOUR RIGHTS AS AN EMPLOYEE OF GLOBAL COMMUNITIES	7	6.3 Accepting Business Courtesies	15
1. Compliance with the Law/Whistle Blower Policy	7	6.4 Offering Business Courtesies to Non Government Personnel	15
1.1 Management Responsibility	7	6.5 Offering Gratuities to United States Government Personnel	16
1.2 Procedures for Reporting Policy Violations	8	6.6 Corporate Opportunities	16
1.3 Investigation and Corrective Action	8	6.7 Political Contributions and Activities	16
1.4 Complaint Procedure	8	7. Respectful Business Communications	16
1.5 Accountabilities and Responsibilities	8	7.1 Electronic Communications	16
2. Equal Employment Opportunity	9	7.2 Reporting and Recording Information	17
2.1 Policy of Equal Opportunity and Anti-Discrimination	9	8. Protect Global Communities' Confidential and Proprietary Information	18
3. No Discrimination, Harassment or Retaliation	10	9. Avoid Fraternization Between Employees	19
3.1 Policy of Anti-Harassment	10	YOUR DUTIES TO OUR CLIENTS AND THOSE WE SERVE	20
3.2 Sexual Harassment	10	10. Be Aware of Diversity & Cultural Sensitivity	20
3.3 Policy of No Retaliation	11	10.1 Working Overseas	20
4. Privacy and Confidentiality	11	11. Know the Foreign Corrupt Practices Act Policy	21
4.1 Your Privacy	11	12. Know the Sexual Exploitation and Abuse of Beneficiaries (SEA) Policy	22
4.2 Expectation of Confidentiality	11	13. Support Global Communities' Security Goals	23
YOUR DUTIES AS AN EMPLOYEE OF GLOBAL COMMUNITIES	12	13.1 Prohibited Materials	23
5. Your Personal Conduct	12	Confidentiality	24
5.1 Unacceptable Behavior	12	Standards of Conduct Acknowledgement Form	25
5.2 Drug-Free Workplace	13		
5.3 Workplace Violence	13		

LETTER FROM THE PRESIDENT AND CEO



Dear Global Communities Colleagues,

We at Global Communities are very proud of our mission, our accomplishments and our commitment to the highest ethical standards. Our community roots are part of our legacy of serving those in need all over the world and providing them with the respect and integrity they so deserve. Our longstanding commitment to our values and standards is reflected in Global Communities' *Standards of Conduct*.

I am pleased to share this document with our employees and partners who are key to the work we do. As we face the challenges of new technologies, new business models, new leadership, new organizational structures and new ways of doing business, it is important that you know that respect and integrity are the overarching principles guiding the manner in which Global Communities operates. These are the same pillars under which this organization was built in 1952, and they will continue to guide us in this rapidly changing environment.

I ask that you take the time to thoroughly read our *Standards of Conduct* and discuss them with your coworkers. While I realize they cannot address every situation, I encourage you to seek to have any questions answered by your supervisor, your Human Resources representative or the Ethics Officer. I also urge you to reflect on how each one of us can further promote ethics, integrity and respect when serving our partner communities across the world.

Respectfully,

A handwritten signature in black ink that reads "David A. Weiss". The signature is written in a cursive, flowing style.

David A. Weiss, President and CEO

LETTER FROM THE CHIEF ETHICS OFFICER



Dear Global Communities Colleagues,

The Global Communities *Standards of Conduct* are about acting ethically, honestly and with transparency. Global Communities is committed to building an environment where our employees can feel respected and valued, and in turn can treat our partners, donors and the communities and individuals we serve with the same ethical standards. Our work in improving the lives of others poses complex questions that may require challenging answers. Often, the best way to handle a given situation may be elusive. We have revised these *Standards of Conduct* to assist you in holding our ethical standards to something greater than following the letter of the law. Our goal is ethical business practices—running our business in a manner that we can be proud of.

We have revised the *Standards of Conduct* to make them easier to understand and have organized them into three main categories: 1) Global Communities' responsibilities to its staff, 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. We also may change this document as circumstances require, laws change and our work expands into new areas. To that end, please use this document as a guide to acting in an ethical way, but also supplement it with your best judgment.

The Office of Ethics is here to help you along the way.

Regards,

A handwritten signature in black ink, appearing to read "Eric M. O'Neill".

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

INTRODUCTION

The success of Global Communities is directly related to the trust and confidence we earn from and instill in our employees, clientele and others with whom we do business. Our values and standards have always been the basis of our success, as they inspire trust and credibility on the local communities we serve, the businesses that we partner with, the governments we work with—all of whom are intrinsic to our longstanding success. These are the same core values that 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 is treated with dignity and respect and afforded the opportunity to achieve their full potential, which, in turn, contributes directly to the success of this organization.

Applicability:

The *Standards of Conduct* address both Headquarters and Expatriate Staff (U.S. citizens, nationals, permanent residents and third country nationals) and Local Staff (staff hired locally that are citizens of the country where Global Communities provides services). All Staff are expected to follow these policies, although in some instances local laws may supersede this Policy. The Policy identifies certain instances where United States law does not apply to Local Staff. In the event of a conflict between this policy and the Field Finance and Accounting Manual (FFAM), the FFAM shall control.



If you have any questions regarding these policies or are uncertain about appropriate conduct, contact your supervisor, our Ethics Officer or another appropriate member of management or the Office of Human Resources.

Accountability:

Everyone who conducts business on behalf of Global Communities—Global Communities employees, executive officers, members of the Board of Trustees, consultants, and Volunteers (hereafter referred to as “Staff”) is responsible for understanding and adhering to these policies, values and standards. Failure to agree to or any violation of any of these policies and rules may result in disciplinary action up to and including termination of employment.

Furthermore, with the exception of at-will employment, Global Communities reserves the right to modify, amend, supplement, delete, or discontinue any of its policies at any time, with or without notice. Employees 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* booklet is publicly available
and can be obtained on our website at:

www.globalcommunities.org/publications/standards-of-conduct.pdf

Our Partner Communities

(The People We Help):

Our business is to partner with communities around the world to help them to improve and direct their lives and livelihoods. All of 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 and in every country where we work. 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 Staff

(Our Fellow 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 Funders

(Our Clients):

We are proud of our partnerships with governments, foundations, corporations, NGOs and, above all, the communities around the world with whom we work, as they play a key role in everything we do. We understand that our ability to conduct our work depends on our funders 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

Staff are required and expected to comply with all applicable governmental laws, rules and regulations, as well as Global Communities' policies, rules and regulations, including these *Standards of Conduct*. If you are unsure of whether a contemplated action is permitted, you should consult with your supervisor or the appropriate resource expert, such as the Ethics Officer, Office of Finance or Human Resources.

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. In many occasions, your manager is the best starting point.

Global Communities prohibits any form of retaliation against staff who, in good faith, report to Global Communities 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 by anyone that involve Global Communities, even if the subject conduct does not actually violate the law. Global Communities also prohibits any form of retaliation against 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 managers are responsible for ensuring adherence to this no-retaliation policy. In addition, each manager is responsible for communicating this policy to staff under his or her supervision and for supporting programs and practices designed to develop understanding of, commitment to and compliance with this policy.



Open communication between managers and employees is crucial to create a safe to speak work environment. Managers can foster an open communication by:

- Regularly discussing the organization's values and standards during team meetings.
- Maintaining an "open door" policy.
- Supporting employees who choose to consult other resources instead of coming directly to you.

In the event that any supervisor or manager believes that a violation of this policy has occurred or receives a report of a violation, he or she must immediately contact the immediate supervisor, the Office of Human Resources, the Ethics Officer, the Regional Director or any Vice-President.

1.2 Procedures for Reporting Policy Violations

If you believe that you have been retaliated against in violation of this policy, you should immediately report the violation to your immediate supervisor, or any of the individuals listed above.

1.3 Investigation and Corrective Action

If you report retaliation prohibited by this policy, Global Communities will promptly investigate the matter. The investigation will be handled as confidentially as practicable, allowing for a fair investigation and any necessary corrective action if a violation of this policy is determined to have occurred. Depending on the nature of the violation, the offending individual can be subject to disciplinary action up to and including termination.

1.4 Complaint Procedure

Any employee who believes that he or she has suffered or witnessed a violation of these *Standards of Conduct* should promptly contact a member of management, the Chief Ethics Officer or Human Resources (whichever the employee feels most comfortable). 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.

Early reporting and intervention has proven to be the most effective method of resolving actual or perceived incidents of discrimination and harassment. While no particular reporting time has been established, Global Communities strongly urges the prompt reporting of complaints or concerns so that rapid and constructive action can be taken. Any supervisor or member of management who becomes aware of possible violations of these *Standards of Conduct*, including discrimination, retaliation, harassment, or Sexual Exploitation or Abuse should promptly report it to the Ethics Officer or Human Resources.

A prompt, thorough, and discreet investigation will be conducted by Global Communities and fair consideration will be given to all the facts presented. The investigation may include: interviews with parties involved and, where necessary, with individuals who may have observed the alleged conduct or may have other relevant knowledge. All employees, including the person(s) making the complaint and the person(s) accused of discrimination

or harassment must cooperate fully in the investigation by providing whatever information and/or documents requested. If it is found from the investigation that the complaint is valid, Global Communities will take immediate and appropriate disciplinary action, up to and including termination. Complaints that are false or malicious may result in disciplinary action against the person making the false complaint. Although this complaint procedure has been created, it is still highly recommended that if you believe you are being harassed, discriminated against, or retaliated against, and you feel comfortable doing so, promptly advise the alleged offender that his or her behavior is unwelcome and that it should be stopped. Often, this simple action will resolve the problem.

1.5 Accountabilities and Responsibilities

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

Managers and 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. Staff supervisors can seek further advice from Human Resources.

Q I would like to raise an issue but would prefer to do it anonymously. Can I still contact the Ethics Office?

A When contacting the Ethics Office, 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 Ethics Officer 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 your consultation with colleagues.

2. Equal Employment Opportunity

Global Communities is committed to the principle of equal employment opportunity in every worksite location and to the development of a workforce with diverse skills and backgrounds, working in a discrimination-free, harassment-free, and retaliation-free environment. Global Communities is further committed to fostering the right of our staff to be free from discrimination, harassment, and retaliation.

We must treat each other with dignity, courtesy, and respect in accordance with these *Standards of Conduct* and the principle of kindness to others. Neither discrimination nor harassment nor retaliation will be tolerated under any circumstances. Global Communities will take all reasonable measures to prevent and eliminate discrimination, harassment, and retaliation of or by Staff, visitors, and beneficiaries.

Global Communities will use educational approaches for the prevention of discrimination, harassment, and retaliation, ensuring that staff members know their rights and responsibilities, and to encourage the reporting of behavior that breaches this policy.

Should a complaint of alleged harassment, discrimination, or retaliation arise, you should notify your supervisor, the Chief Ethics Officer or any member of the Human Resources Staff. Human Resources will then conduct a thorough and timely investigation into the matter. Any Staff found to be in violation of this policy will be subject to discipline up to and including termination.

2.1 Policy of Equal Opportunity and Anti-Discrimination

It is Global Communities' policy to recruit and employ the best-qualified personnel and not to discriminate against Staff or applicants for employment. Accordingly, Global Communities is committed to strict compliance with all applicable laws which prohibit discrimination and harassment in the workplace. Specifically, Global Communities strictly prohibits discrimination or harassment based on race, age, color, creed, religion, sex, marital status, sexual orientation, 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 and other workplaces and all other locations where Global Communities is providing services, and to all work-related activities. 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 for an open position?

A There is no business justification for advertising a job based on gender or age. Treating people fairly by hiring based only on job-related criteria is not only fair, it makes perfect business sense.



3. No Discrimination, Harassment or Retaliation

3.1 Policy of Anti-Harassment

In accordance with all applicable state and federal laws of the United States, as well as any applicable local 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 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;
- Persistent and unjustified criticisms, often about irrelevant or insignificant matters;
- Humiliating a person through gestures, sarcasm, criticism and insults, often in front of staff, management or other workers;
- Spreading gossip or false, malicious rumors about a person with an intent to cause the person harm.

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

A The Ethics Officer can certainly advise you in a confidential environment and also recommend language to handle delicate situations with colleagues. If you feel inclined to do so, you can also discuss the issue with your manager or with someone in the Human Resources Office.

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 unwelcome conduct which is offensive to the individual, harmful to morale, and which interferes with the effectiveness of Global Communities' business and affairs. While generally it consists of repeated and/or persistent conduct, a single incident will suffice if serious enough. It can range from subtle behavior to explicit demands for sexual activity or even criminal assault and including but not limited to the following examples:

- Inappropriate jokes or comments with sexual connotations;
- The display of sexually suggestive material;
- Innuendo;
- 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;
- Subtle or overt requests for sexual favors;
- Inappropriate written communications, via telephone (text message), electronic mail, or other computer system messages;
- Unnecessary close physical proximity including persistently following a person or blocking a person's movements;
- Unwelcome physical contact such as 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;

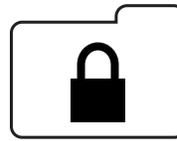
- Negative behaviors, i.e. intimidation or exclusions related to sex of the recipient.

3.3 Policy of No Retaliation

Global Communities prohibits and will not tolerate retaliation against any individual who makes a complaint of discrimination or harassment in good faith under this policy, opposes in good faith what he or she reasonably believes to be harassment or discrimination, has assisted another person make a complaint, or provided information during or otherwise participated in an investigation of a complaint of harassment or discrimination.

4. Privacy and Confidentiality

4.1 Your Privacy



Your employment file is Global Communities' property and is kept confidential and secure in Human Resources. If required by law, and in compliance with applicable regulations, government agencies or third parties may also be permitted to view your file.

Your file may contain all or some of the following:

- W-4 tax form
- Application
- Resume
- 401k application
- Direct deposit forms
- Emergency information
- Documentation of any promotion, salary change, or counseling forms
- Performance reviews
- New hire paperwork

You may review your file at the Global Communities Office of Human Resources at your request. Global Communities' policy is not to produce copies of employment files, but you may review it and take notes.

4.2 Expectation of Confidentiality

One of the most important documents signed when you are hired is the Global Communities Confidentiality Agreement. This form is vital to the Company because it requires that current and former employees agree not to divulge confidential and/or proprietary information that could damage Global Communities' global mission to help those in need. You are required to sign the agreement when you are hired. The confidentiality of Global Communities' proprietary information is critical to the success of our mission and must be strictly maintained.

YOUR DUTIES AS AN EMPLOYEE OF GLOBAL COMMUNITIES

5. 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 and rules;
- 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.

5.1 Unacceptable Behavior

We must all use our best professional judgment to conduct ourselves in an ethical and dignified manner. Please understand that it is not possible to list all the forms of behavior that are considered unacceptable in the workplace and the list below includes a few examples of the type of behavior that is not permitted. **If you have any questions concerning appropriate behavior, please ask your supervisor or manager. If you observe, become aware of, or are subject to inappropriate behavior or conduct, this should be promptly reported to your supervisor or manager or another member of management.** Examples of improper conduct/unacceptable behavior include:

- Violation of any of Global Communities' policies, procedures and rules;
- Insubordination;
- Displays of disrespect toward fellow Staff, visitors or other persons;
- Theft, fraud or other dishonesty;
- Falsification or allowing falsification of employment records, employment information, or other records, including timecards or other time 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;
- Human trafficking, which is the illegal trade of human beings for the purposes of reproductive slavery, commercial sexual exploitation, forced labor, or a modern-day form of slavery;
- Sex trafficking, a commercial sex act that is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained the age of consent; recruitment, harboring, transporting, providing, using, or obtaining a person for labor or services through the use of force, fraud, or coercion; 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 our Ethics Officer, any member of Global Communities' management above your supervisor in Global Communities' chain of command, or directly to Human Resources.

Q On my job application I have indicated that I have a graduate degree. Unfortunately, I had to quit school a few hours short from completing the course requirements, but plan on resuming my classes in the near future. Can this be considered unacceptable behavior?

A Yes, submitting false information regarding your education or employment history is considered unacceptable and grounds for dismissal.



5.2 Drug-Free Workplace

Global Communities is a drug-free workplace. Please refer to Global Communities' Drug-Free and Alcohol policy within employee handbooks, which all Staff are expected to read, understand and comply with.

5.3 Workplace Violence

We do not tolerate workplace violence, threats, or intimidation against Staff by anyone, including beneficiaries, vendors, and other employees. Consistent with this policy, acts or threats of physical violence, including intimidation, harassment, and/or coercion, which involve or affect the Company or its employees, will not be tolerated.

Acts or threats of 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:

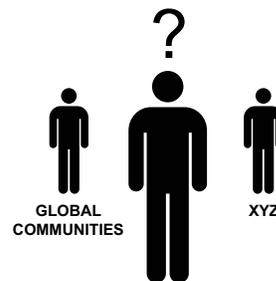
- All threats or acts of violence occurring **on** Global Communities' premises, regardless of the relationship between Global Communities and the parties involved in the incident;
- All threats or acts of violence occurring **off** Global Communities' premises involving someone who is acting in the capacity of a representative of Global Communities;
- All threats or acts of violence occurring **off** Global Communities' premises involving a Global Communities employee if the threats or acts affect the interests 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;
- Harassing surveillance or stalking;

- The suggestion or reference that violence is appropriate.

These are just examples. Any act or threat of violence is serious. Any employee, who physically or verbally threatens, harasses or abuses someone at or from the workplace, or otherwise puts his or her safety or productivity at risk, will be subject to corrective action up to and including termination. If you become aware of anyone violating this policy, please report it to your supervisor or to Human Resources immediately.

6. 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 their position with Global Communities.

Staff who negotiate or award contracts and grants or who can influence Global Communities business 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.
- You 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.

6.1 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 employment. If hired through Headquarters, submit employment requests to Human Resources. If hired locally, submit these requests to the Country Director or Chief of Party.

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 remove the conflict so that you can be employed.

Temporary Employees/Consultants: Our temporary employees and consultants may not work for companies other than Global Communities during the actual time they are working on a Global Communities assignment. To avoid potential double or overbilling of clients, or a conflict between two related jobs, Global Communities generally discourages engaging consultants who are working for more than one client or under more than one agreement at the same time.

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 outside work requires permission.

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

We must avoid doing anything that may lead others to think that we sought, received or gave in exchange for personal business courtesies. 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 who 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.

Generally, you should avoid providing gifts or gratuities to Government employees. You must seek the advice of the Global Communities General Counsel prior to providing any business courtesies to Government employees.

6.3 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 the firms 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 a courtesy from the other party to avoid creating the impression that offering courtesies is the way to obtain Global Communities business.

You must report any individual courtesies that are in excess of what is considered the cultural norm to your manager or the 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 supplier 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 manager 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 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 Ethics Officer.

Q I was invited to speak for senior managers of a company who is interested in working with Global Communities. In addition to my travel expenses, they have offered to compensate me for my time. Is this an issue?

A This may create a conflict of interest, as this relationship may influence your decision on whether or not to do business with the company in the future. Before you accept the speaking engagement, you should let your manager know and seek advice from the Ethics Officer.

6.4 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 courtesies, including meals, refreshments or entertainment of reasonable value provided the business courtesies:

- 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.

6.5 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 Government employees.

Q I have been invited to the wedding of an important government official. In my culture, it is expected that guests will bring cash gifts to the wedding. What should I do?

A Cash and non-cash gifts are not allowed. You should consult with your manager if you believe an exception should be warranted.

6.6 Corporate Opportunities



Staff may not benefit from opportunities that are discovered through the use of Global Communities property, information or position without the consent of Global Communities. No Global Communities staff member may use Global Communities property, information, or position for improper personal gain and no Global Communities employee may compete with Global Communities directly or indirectly. We owe a duty to Global Communities to advance its legitimate interests when the opportunity to do so arises.

6.7 Political Contributions and Activities

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

As private citizens, we are encouraged to participate in the political process, as long as it is a personal decision that is separate from your position at Global Communities. We must participate in the political process during personal time. It should not interfere with our duties as Global Communities staff members and should be on an individual basis and at our sole expense.

Q When I receive emails advising me how I may reach my Congress person about certain international development issues, am I required to do so?

A Your involvement is absolutely voluntary.

Q I was asked to help with a fundraiser for my local congressman. Is it OK?

A Global Communities does not get involved in politics. As a private citizen, you may be involved in the political process, including contributing to candidates or parties of your choice. However, you may not use Global Communities’ time, property or resources for your own personal political activities.

7. Respectful Business Communications

7.1 Electronic Communications



Global Communities encourages all of us to make efficient and effective use of communication tools, such as email, the Intranet, internet, voicemail, telephones, photocopiers and fax machines. 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 all employees. 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:

- Disclosing confidential or proprietary information.
- 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, etc., unless specifically authorized by Global Communities to do so.
- Conducting private commercial business on the internet or email systems.
- Violating others' intellectual property rights.

Expectation of Professionalism in Using All Electronics

You are reminded to be courteous to other users of the system and always to conduct yourself in a professional manner. Emails, in particular, are sometimes misdirected or forwarded and may be viewed by persons other than the intended recipient. We must take the same care writing email communications that we would use for letters or internal memoranda on Global Communities' letterhead. Before you send an email, ask yourself "is this something I would want a lawyer to review?"

Offensive and Inappropriate Behavior

Global Communities' policy against discrimination, harassment (sexual or otherwise), and retaliation applies fully to Global Communities' computer system, and any violation of that policy is grounds for corrective actions up to and including termination. Therefore, no email messages should be created, sent or received if they contain intimidating, hostile, or offensive material concerning race, color, religion, creed, gender, sexual orientation, marital status, pregnancy, veteran status, age, national origin, disability or any other classification

protected by applicable law.

Material that is fraudulent, harassing, embarrassing, sexually explicit, profane, obscene, intimidating, defamatory, or otherwise unlawful, inappropriate, or offensive may not be downloaded from the Internet or displayed or stored in Global Communities' computers.

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

A Global Communities, as many other companies, may access its communication systems for many reasons. Our operations and network Staff may access email in the course of 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 A friend sent me a chain letter email requesting that I forward to ten others to support a charitable cause. Is it OK?

A No. Circulating chain letters through company systems is prohibited.

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.

7.2 Reporting and Recording Information

As a Global Communities staff member, we must strictly comply with many laws, rules, and regulations which govern its business through its many offices throughout the world. The simplest and most important action each staff member can take to ensure that these many obligations are met is to be truthful and accurate in his or her business communications. You must create accurate records that reflect the true nature of the transactions

and activities that they record (including but not limited to, reporting of time, documenting attendance and absence, productivity.) 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. 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.

If you believe your representations have been misunderstood, you are responsible for clarifying such representations. If information required to be provided by Global Communities was inadvertently omitted, the information must be supplied promptly.

8. Protect Global Communities' Confidential and Proprietary Information

Our business success relies on the protection of Global Communities' most important information, as well as confidential information shared with Global Communities by beneficiaries and other business partners. Confidential and proprietary information includes any and all technical and non-technical information disclosed by Global Communities, which may include without limitation: (a) patent and patent applications, (b) trade secrets, and (c) proprietary and confidential information, mask works, ideas, techniques, sketches, drawings, works of authorship, models, inventions, know-how, processes, apparatuses, equipment, algorithms, software programs, software source documents, and formulae related to the current, future, and proposed products and services of Global Communities, its beneficiaries, or its business partners, such as information concerning research, experimental work, development, design details and specifications, engineering, financial information, procurement requirements, purchasing, manufacturing, beneficiary lists, investors, employees, business and contractual relationships, business forecasts, sales and merchandising, marketing plans and information, 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, charts, or disks), we must make sure that the *confidential information* is labeled as “**Confidential and Proprietary to Global Communities**” (for example, on a document the legend should appear in the document footer). Marking information as confidential and proprietary is one of the most efficient and effective ways of protecting 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 or proposals to ensure that they do not inappropriately contain *confidential information*.

It is also important that we respect the property rights of others. Accordingly, you must not acquire or seek to acquire by improper means another party's trade secrets or other proprietary or confidential information. Staff also must not engage in unauthorized use, copying, distribution or alteration of software or copyrighted materials or otherwise violate the intellectual property rights of others.

The obligation to preserve *confidential information*, whether of Global Communities or another party, continues even after employment ends.

Q My brother-in-law sells insurance policies and would like to offer his products to Global Communities employees in my office. Can I provide him with names and contact information for my colleagues?

A No. Contact information of employees is personal information and is protected by our policies in all locations in which our employees work and by law in many countries. Our employee privacy policies do not allow disclosure of family information to third parties for any reason.

Q During my commute to the office on the train, 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, trains, elevators or at conferences and tradeshow. When necessary to make a phone call in a public place, be aware of your surroundings.

If, during your employment, you receive any request, whether by court order or by other state authority, to disclose *confidential information*, notify your supervisor immediately before responding or further acting on any such request. Your supervisor will inform the Office of the General Counsel who will review the disclosure. If you receive such a request after your employment with Global Communities has ended, you are required to contact the Office of the General Counsel.

If you have any questions or are uncertain whether any information is considered confidential, you should check with your supervisor.

9. Avoid Fraternization Between Employees

At Global Communities, we are proud of our unique workplace culture—a community of individuals from all walks of life coming together to make a difference in the world. We strongly believe we can have a work environment that is simultaneously professional, productive, pleasant, and gratifying. We want our employees to get to know each other and to form productive, professional bonds with one another. At the same time, however, there are certain boundaries that must be observed. You may not supervise someone with whom you share a close personal relationship, such as anyone in your family or household, someone with whom you have or had a romantic relationship or other close personal relationship. Nor may you participate in the selection process or supervise Global Communities' relationship with a company that does business with Global Communities, if it employs someone with whom you have a close personal relationship.

If you supervise someone, even indirectly, with whom you have one of the relationships described above, you must disclose the relationship promptly. A manager or supervisor who becomes romantically involved with someone he or she supervises, or with someone whose terms and conditions of employment he or she has the ability to influence, exposes himself or herself and Global Communities to potential charges of favoritism, improper use of authority, and sexual harassment. Accordingly, managers, supervisors or any other employee that has the authority to directly or indirectly affect the terms and conditions of another's employment may not fraternize with that employee.

The fraternization behavior covered by this policy includes dating, romantic involvement, sexual relations, or the exchange of affections. Global Communities does not intend this fraternization policy to otherwise discourage friendship or consensual social activities among Company employees. Should a personal relationship prohibited by this policy be contemplated or formed, the supervisor or manager or co-worker involved is required to notify his or her manager immediately. Where a personal relationship prohibited by this policy exists, Global Communities shall 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 in the Organization's discretion.

Global Communities recognizes that the question of whether a relationship constitutes fraternization or simply a social relationship is a very personal issue. However, because of the potential for inappropriate conduct, you are encouraged to bring any questions you may have regarding fraternization to the attention of your supervisor or Human Resources.

Q I am dating a co-worker who is being promoted to supervisor of our team. Do we have to bring this to the attention of our manager?

A Yes. This situation would create a conflict of interest in your group. Even if you and your colleague are currently equals in the same group, you should advise your manager of the relationship to prevent an inappropriate reporting relationship.

YOUR DUTIES TO OUR CLIENTS AND THOSE WE SERVE

10. Be Aware of Diversity & Cultural Sensitivity

Global Communities Staff interact with a variety of people across the world from diverse cultures, each with its own standards of acceptable and unacceptable conduct. These standards, as you can imagine, vary immensely: in some cultures, it is acceptable to greet a person with a kiss on the cheek, while in others, it is inappropriate for men and women to even shake hands. While Global Communities will do its best to provide you with as much information as it reasonably can to assist you in complying with this policy, **it is your responsibility as a Global Communities staff member to know the relevant standards of appropriate conduct for interacting with co-workers, beneficiaries, and business partners.** Don't presume you know—ask your supervisor or coworkers with more time at your location if there are special customs or taboos that you should observe. **Not knowing is NOT an excuse for violating this policy.**

To be an effective Global Communities staff member, it is essential to adapt to working in a multicultural, multiethnic, multiracial environment. We must always be cognizant, and respectful of the uniqueness of our coworkers, work environment, and beneficiary population. We must also learn to adopt cultural

competencies. Cultural Competency is “a set of appropriate behaviors, attitudes, beliefs and policies that enable a system, organization, or individual to work effectively in cross-cultural situations.”

10.1 Working Overseas

A country's culture is interwoven into the very fabric of every member of that group and is a controlling influence in the way people live, think, act, speak and behave. Culture is central to the experience of living overseas. How Global Communities conducts itself in each of the countries and cultures we work within has an impact on our success. The respect we have for these cultural mores is significant to our success. This involves understanding local customs, mores and protocols.

Accordingly, in addition to obeying the laws of their host country, Global Communities Staff posted overseas must at all times—even after working hours—be sensitive to and adhere to the standards and norms of their host country's culture. The work Global Communities undertakes is dependent upon the reputation it has built in the international development community over the years. Much of that reputation is based on the conduct of Global Communities Staff in the Field while interacting with the communities to



whom the organization is providing assistance. It is imperative that all Staff, particularly those with direct contact with program beneficiaries, remain beyond reproach. A good barometer of this is whether we are proud to tell our families how we are conducting ourselves in these situations.

It is critical that Global Communities Staff and visitors to Global Communities Field Offices consider that one's activities outside of the customary scope of work is still on display, and that some actions may have an adverse effect on Global Communities, its reputation and its ability to successfully implement the deliverables.



Global Communities recognizes that certain international standards of behavior must be upheld and that these standards take precedence over local and national cultural practices.

Global Communities Staff commit that they will:

- Always strive to treat all persons with respect and courtesy in accordance with applicable international and national conventions and standards of behavior;
- Never intentionally commit any act or omission that could result in physical, sexual or psychological harm to the beneficiaries we serve, or to their fellow workers; and
- Not condone or intentionally participate in corrupt activities or illegal activities.

Examples of Cultural Sensitivities:

- Each culture has different definitions for what is considered appropriate;
- Be aware that jokes may not translate across cultures;
- Avoid discussing sensitive issues (i.e. religion & politics);
- Be cognizant of gender norms and what is considered appropriate (especially in regard to greetings, touching and relationships);
- Do what you can to ensure your appearance is in accordance with local standards. Making comments about local standards could be seen as offensive;

- Do not leap to conclusions about the character, motivation, or integrity of an individual based on one interaction;
- Treat national (i.e., local) Staff with the same dignity that you would treat expatriate Staff;
- Promote and model tolerance and acceptance of all people.

Q Is it acceptable to display political symbols and materials in one's personal work area?

A We understand and respect our Staff's desire to express political positions. However one should bear in mind that excessive personal displays and political-oriented displays at work functions or on Global Communities' premises may be perceived as hostile or intimidating to colleagues who have different philosophies.

11. 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 members are subject to the Foreign Corrupt Practices Act, 15 U.S.C. 78dd-1, et seq (FCPA). Accordingly, 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, you must not give anything of value to a government official.

In some instances facilitating (e.g., "grease") payments may be acceptable if the payment is required as a normal course of business (i.e., a non discretionary administrative processing fee). The Payment of such fee **MAY NOT** be made to a government official. Furthermore, in order to make a facilitating payment, field personnel must follow the training and

policies provided by the Finance Department and the Field Finance and Accounting Manual. Any Global Communities officer or employee engaging the services of a contractor or entering into any type of arrangement with a third party must make sure that the third party's business practices do not put them at risk of making illegal bribes in violation of the FCPA. Should it appear that the third party entity engages in questionable practices, all negotiations and contact with the third party should be suspended and Global Communities' Chief Financial Officer must be notified immediately.

In addition, once it is determined that a given payment, gift, or contract is permissible under the FCPA, it is mandatory and critical that Global Communities document the fact of the payment, gift, or contract, the purposes of these payments, gifts, or contracts, and the due diligence Global Communities exercised prior to making that payment, gift, or contract. 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, gift, or contract is deemed proper under the FCPA.



In short, it is the duty of every Global Communities employee, agent, partner, or representative 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 control procedures;
- 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 General Counsel (HQ violations) or Chief Financial Officer (Field Office violations).

12. Know the Sexual Exploitation and Abuse of Beneficiaries (SEA) Policy

Global Communities recognizes the unequal power dynamic between its Staff and beneficiaries and the resulting potential for exploitation inherent in its work. Global Communities further recognizes that exploitation undermines the credibility of its work and severely damages victims of these exploitative acts and their families and communities. As a condition of their employment, Global Communities employees, consultants and volunteers must acknowledge and agree to the following core principles:

- Sexual exploitation and abuse by Global Communities Staff constitute acts of gross misconduct and are, therefore, grounds for termination of employment.
- Sexual activity with children (defined according to the Convention on the Rights of the Child, as all persons under the age of 18) is prohibited, regardless of the local age of majority or age of consent. Mistaken belief in the age of a child is not a defense.
- Exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior is prohibited. This prohibition includes exchange of assistance that is due to beneficiaries.
- Sexual relationships between Global Communities Staff and beneficiaries are forbidden since they are based on inherently unequal power dynamics. Such relationships undermine the credibility and integrity of humanitarian aid work.
- Where a Global Communities Staff member develops concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, he or she must report such concerns to their supervisor, the Ethics Officer or a member of Human Resources at HQ.

- Humanitarian workers are obliged to create and maintain an environment which prevents sexual exploitation and abuse, while promoting the implementation of the required code of conduct. Managers at all levels have particular responsibilities to support and develop systems that maintain this environment.

If Global Communities discovers that any of its Staff has violated this policy, Global Communities will take all necessary action, including immediately terminating that staff member's employment, reporting all unlawful conduct to the local authorities, and cooperating in any subsequent investigation by said local authorities. Global Communities will not tolerate any violation of this policy.

If you have any questions about SEA, please contact the Office of the General Counsel.

13. Support Global Communities' Security Goals

Global Communities is an international non-governmental organization (INGO) and endeavors to maintain neutrality and gain the acceptance of its beneficiaries. Personal opinions regarding host-country politics and policies must be kept in check, especially when posted overseas or conducting international travel, as Global Communities operates in each country with the consent of the host-nation government. From a security perspective, failure to respect the host-nation government's writ and authority, as well as local custom and culture, may place Global Communities Staff at risk. Violations of these principles will be reported to Global Communities management. Additionally, you should refrain from writing or blogging about your work/ travel experiences absent prior approval from your supervisor, the Office of Communications, and the Office of Global Security.

Global Communities also endeavors to provide for the safety and security of its staff. Similarly, Global Communities Staff have a responsibility to support overall security of the Organization. That being said, Global Communities Staff will not be issued and will not carry weapons while performing official duties on behalf of Global Communities. You will be subject to appropriate disciplinary action, up to and including dismissal, for violating this policy. See Global

Communities' Weapons Policy for more specific information.

In accordance with International Standards and Principles on Security and Human Rights, security practices will be monitored by the Office of Global Security or by third party auditors. All allegations of human rights abuse by Staff or security personnel should be recorded and immediately reported to Global Communities' Office of Global Security. All personnel posted overseas will be asked to annually certify in writing if they have witnessed, reported, participated in or committed a human rights violation. See Global Communities' Use of Force Policy for further information.

13.1 Prohibited Materials

Prohibited Materials that you are not allowed to have in your possession on Global Communities Property include firearms, other weapons, explosives, and/or hazardous materials; illegal drugs or other controlled substances; drug-related paraphernalia; and alcoholic beverages not authorized by senior management.

CONFIDENTIALITY

The Organization will not tolerate retaliation against any employee who raises a business practice issue. Any employee who raises a business practices issue will be protected from retaliation. This protection extends to anyone giving information in relation to an investigation. However, Global Communities reserves the right to discipline anyone who knowingly makes a false accusation, provides false information or has acted improperly.

When contacting the Ethics Office, 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 Ethics Officer or his designee 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 your consultation with colleagues.



STANDARDS OF CONDUCT ACKNOWLEDGEMENT 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 can lead to disciplinary action up to and including dismissal.

Signature _____ Date _____

Name (Printed) _____

