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).
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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.

It is vitally important that everyone knows we are committed to the very highest standards, policies and procedures for preventing sexual abuse, exploitation and harassment by and of NGO staff, to protect both our own staff and the communities we serve. I urge all of you to become familiar with these standards, policies and procedures.

We also value and celebrate our diversity, and we have been working throughout Diversity and Inclusion Council to further ensure the inclusiveness of everyone at Global Communities, and that all of our employees are treated with respect and dignity.

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 Chief Ethics Officer. I also urge you to reflect on how each one of us can further promote ethics, integrity, dignity and respect when serving our partner communities across the world.

Respectfully,

David A. Weiss, President and CEO
Dear Global Communities Colleagues,

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.

The 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.

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 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,

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, 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. To this end, Global Communities is committed to diversity and inclusion in every country in which we work and to respecting the value of different people and perspectives.

Applicability:

The Standards of Conduct apply to all Global Communities employees worldwide, executive officers, management, members of Global Communities’ Board of Trustees, interns, and volunteers (hereafter 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 (hereafter 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, our Chief Ethics Officer, another appropriate member of management, or the Office of Human Resources.

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 business is to partner with communities around the world to help them improve 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 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.

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, rules and regulations, including these Standards of Conduct. If you are unsure whether a contemplated action is permitted, you should consult with your supervisor or the appropriate resource expert, such as the Chief Ethics Officer, the Finance Department 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 any 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 subject 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 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 ensuring that Staff complete the mandatory online annual ethics training that reinforces this policy.

Open communication between managers and employees is crucial to creating a safe work environment where employees are free to speak with any manager at any time about any matter that is important to them. Managers 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 resources instead of coming directly to the manager.

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 follow the Complaint Procedure described in Section 1.2 on the next page.
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 Office of Human Resources, 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 Human Resources 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.

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.

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.

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 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 fair employment practices 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.
Is it acceptable to stipulate gender and age for an open position?

No. 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 also makes perfect business sense.

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.

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

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 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 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 will suffice if serious enough. 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’ Policy of Anti-Sexual Harassment & Reporting Procedure has an obligation to immediately report the matter to the Chief Human Resources Officer, the Headquarters Senior HR Manager, the Chief Ethics Officer, or the Deputy Ethics Officer. If the supervisor is based in a host country office, the supervisor may use any of the points of contact listed above, or may choose to report to the Country Director, Chief of Party or host country Human Resources Department, who will in turn inform the Chief Human Resources Officer and the Headquarters Senior HR Manager by sending an email to sharassmentreporting@globalcommunities.org.

For more information, please refer to Global Communities’ Policy of Anti-Sexual Harassment & Reporting Procedure.
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 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.

4.1 Unacceptable Behavior

We must all use our best professional judgment to conduct ourselves in an ethical and dignified manner. 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 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 our Chief 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.

4.2 Drug-Free Workplace

Global Communities is a drug-free workplace. Please refer to Global Communities’ Drugs and Alcohol policy within the employee handbook, 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, including beneficiaries, vendors, and other employees.

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;
- 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 Office of Communications and Public Affairs (CPA). Staff are not authorized to communicate with the media regarding Global Communities without the prior approval of CPA. 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. CPA must be consulted in the case of sensitive or potentially negative media reporting.

We encourage all Staff to actively engage with Global Communities’ social media outputs and to participate in discussions and debates around relevant issues in our professional sphere. You are representatives of Global Communities on social media and must be careful to maintain the same professional attitude online regarding your employment that you are expected to show in the physical office.

Global Communities acknowledges that some Staff may interact with the media or publish material in their private capacity. In instances where you have interests which involve a public aspect relevant to Global Communities’ operations, you must provide full disclosure to CPA prior to taking on or resuming such interests. Global Communities may require that you discontinue such activities if they are deemed to be contradictory to Global Communities’ mission, could endanger our work or harm our reputation.

For more information, please refer to Global Communities’ Media Inquiries and Public Communications Policy.

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:
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 you do for Global Communities, conflicts with Global Communities’ interests or interferes with your job performance. Any outside work requires permission.

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 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.

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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 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 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 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 Chief 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 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 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 Government employees.

5.6 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.

5.7 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.

6. Respectful Business Communications

6.1 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:

- 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 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 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.

Questions and Answers

Q: Does Global Communities actively monitor internet access or employee’s email?
A: Global Communities 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.

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. Because even a minor error—including but not limited to, reporting of time, documenting attendance and absences, productivity — 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 confidential information shared with Global Communities by beneficiaries 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' beneficiaries, 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, charts, or disks), 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 My brother-in-law sells cell phones and he would like to offer them to Global Communities employees. Can I provide him with the names and contact information of 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 tradeshows. 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.
8. 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, or someone with whom you have a romantic 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.

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.

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

9. 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 more locally experienced if there are special customs or taboos that you should observe. Not knowing is NOT an excuse for violating this policy.

9.1 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 and 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 Global Communities Staff exhibit while interacting with the communities that we work with around the world. It is imperative that the conduct of all Staff, particularly those with direct contact with program beneficiaries, remains professional at all times.

It is critical that Global Communities Staff and visitors to Global Communities Field Offices consider that their activities outside of their customary scope of work are still on display, and that some actions may have an adverse effect on Global Communities, its reputation and its ability to successfully implement its programs.
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 colleagues; 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;
- Treat national (i.e., local) Staff in the same manner 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 political-oriented displays on Global Communities’ premises may be perceived as hostile or intimidating to colleagues who have different philosophies.

**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 members are subject to the Foreign Corrupt Practices Act, 15 U.S.C. 78dd-1 (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 foreign government official.

In some instances facilitating payments 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. 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 documents 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;
- 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).

**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.

**11. Prevention of Sexual Exploitation and Abuse of Beneficiaries (PSEA) 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 of beneficiaries by a colleague, he or she must immediately report such concerns through the Complaint Procedure outlined in Section 1.2 above.

Global Communities Staff are responsible for creating and maintaining an environment which prevents sexual exploitation and abuse of beneficiaries. Managers at all levels have particular responsibilities to maintain this environment by regularly communicating this policy to Staff.

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 PSEA, please contact the Office of the General Counsel.

12. Know Policy Prohibiting Trafficking in Persons

Global Communities has zero tolerance regarding trafficking in persons. Global Communities employees, 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, unless:
    - exempted from the requirement to provide or pay for such return transportation by USAID under an award; or
    - the employee is a victim of human trafficking seeking victim services or legal redress in the country of employment or a witness in a human trafficking enforcement action;
  - 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 e-mail address at help@befree.org.
13. Support Global Communities’ Security Goals

Global Communities 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 customs and culture, may place Global Communities Staff at risk. Violations of these principles will be reported to Global Communities management.

Global Communities also endeavors to provide for the safety and security of its Staff. Similarly, all 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 termination of employment, for violating this policy.

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.

For more information, please refer to Global Communities’ Field Security Manual.

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

It is Global Communities' policy to thoroughly, and as confidentially as possible, investigate all complaints of employee misconduct. When concerns are brought to our attention, an impartial and confidential investigation will be conducted and facts will be carefully considered before making any decisions. Investigations will only involve individuals who have an absolute need to know. To ensure confidentiality, it is paramount that you practice discretion and refrain from discussing your complaint 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 and policies can lead to disciplinary action up to and including termination of employment.

Signature ___________________________ Date ___________________

Name (Printed) ______________________________