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**Responsible Division:** Finance,  
Contracts and Pricing

# Standards for Business & Ethical Conduct



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## Standards of Business and Ethical Conduct

### Introduction

At Social Impact, our mission is to help global development organizations and programs be more effective at improving people's lives. Social Impact (SI) is committed to upholding the highest Standards of Business and Ethical Conduct and maintaining compliance with all applicable policies, laws, rules and regulations.

SI requires that employees and affiliates who represent SI's interests observe all applicable US laws and regulations as well as those of the countries in which they are working or traveling while on SI business.

Beyond following the law, one of the fundamental principles of professional business conduct at SI is to treat others with respect. Respectful, professional conduct furthers the company's mission, promotes productivity, minimizes disputes, and enhances the company's reputation. All employees and affiliates are expected to demonstrate cultural understanding, sensitivity, and respect in their conduct of SI business.

These Standards embody how we live up to our values: deliver quality, act with integrity, collaborate and learn, and embrace camaraderie.

### 1. Purpose

The purpose of this document is to inform SI employees and affiliates of SI's commitment to the highest Standards of Business and Ethical Conduct and what is expected of them.

### 2. Scope

These Standards apply to all SI employees and affiliates.

**SI employees** include headquarters and project offices, directors, employees, and interns whether based inside and outside of the United States; regardless of nationality or citizenship; and it includes full-time, part-time, and temporary employees.

**SI affiliates** include volunteers, consultants, and all independent contractors conducting business or activities on behalf of SI. All SI affiliates are required to read these Standards and sign a

statement of acknowledgement. It is the responsibility of the SI project manager for each affiliate entity to ensure that the affiliate has followed this procedure.

SI receives its funding from a variety of clients, including the US Government and US companies and the governments and private companies of other countries. By accepting such funding, we must follow applicable client rules and regulations. As the US Government is the major source of funding for SI, these Standards are written principally to address the regulations and laws pertaining to the US Government and its agencies. However, these Standards and their requirements apply to all SI employees and affiliates, regardless of the source of funding or award on which the employee or affiliate may work.

### 3. Training/Guidance

SI is committed to providing training and/or guidance on ethics and good business practices for all employees and affiliates. SI shall provide annual training on Compliance and Ethics and other related topics. Additional guidance and information can be found on SI's website [www.socialimpact.com](http://www.socialimpact.com).

### 4. Consequences of Violating the Standards

Anyone who is found to have violated these Standards will be subject to prompt disciplinary action up to and including immediate termination of employment or applicable affiliate agreement. If suspended, such suspension may be with or without pay. Depending on the nature of the violation, SI may be required to report the violation to the Inspector General, appropriate police jurisdiction, and/or other oversight agency as required by law. Regardless, SI may take legal action, or other actions as deemed appropriate by SI.

### 5. How to Report a Violation of the Standards

SI provides employees and affiliates with multiple avenues for reporting actual or suspected violations:

- SI's Compliance & Ethics Hotline. Real or suspected violations may be reported online or by telephone and may be reported anonymously

Compliance & Ethics Hotline via phone – (703) 562-9137

Compliance & Ethics Hotline via email - [compliance@socialimpact.com](mailto:compliance@socialimpact.com)

- Real or suspected violations may be reported to the Chief Compliance and Ethics Officer

The Chief Compliance and Ethics Officer, or his/her designee, will promptly and thoroughly investigate all reports and complaints. Investigations will be kept confidential to the extent permitted by law and by the company's need to properly investigate the situation.

## 6. Consequences of Not Reporting a Violation of the Standards

Employees and affiliates play an important role in upholding these Standards. If an SI employee or affiliate suspects a violation, even if the evidence is unclear, please report it. Often circumstances are complicated and there may be steps or options that can be taken to mitigate a violation or potential violation.

An employee or affiliate who discovers any potentially unlawful or unethical activity related to SI projects, business practices, or activities is obligated to report it as required by the Federal Acquisition Regulations (FAR) Clause 52.203-13 entitled “Contractor Code of Business Ethics and Conduct” and may do so without fear of retaliation or liability (unless said person or affiliate is the perpetrator of said violation)

Anyone who is found to have knowingly failed to report a violation of these Standards will be subject to prompt disciplinary action up to and including immediate termination of employment or applicable affiliate agreement. If suspended, such suspension may be with or without pay.

## 7. Anti-Retaliation (Whistleblower Protection)

SI will not retaliate against a whistleblower. This includes, but is not limited to, protection from retaliation in the form of an adverse action such as termination, decreased compensation, poor work assignments, and threats of physical harm. Any whistleblower who believes he/she is being retaliated against must contact SI immediately. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

Insofar as possible, the confidentiality of the whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law, and to provide accused individuals their legal rights of defense. Individuals protected include the following:

- The employee or affiliate who reports to an SI employee or is about to report to SI a matter of concern.
- The employee or affiliate who reports or is about to report to a public body or government entity, a matter of public concern.
- The employee or affiliate who participates in a court action, an investigation, a hearing, or an inquiry held by a public body on a matter of public concern.

SI will not tolerate retaliation against any employee who in good faith reports actual or suspected violations of the Standards. If you believe you or others are the subject of retaliation for reporting actual or suspected violations or participating in an investigation, you must report the matter to the Compliance & Ethics Hotline or the Chief Compliance and Ethics Officer.

## 8. Cooperation with Investigations

You must cooperate completely in any investigation relating to SI and must be truthful always. You may not interfere with or obstruct an investigation conducted by the company or any

government agency. In addition, you may not disclose or discuss an investigation without prior approval of the Chief Compliance and Ethics Officer.

## 9. Fraud

Fraud is the false representation of a matter of fact, whether by words, conduct, false allegations, misleading allegations, or concealment of information that should have been disclosed. This is done to deceive an individual or company so that the individual or company will act to its detriment. Fraud can occur when an employee or affiliate acts for personal benefit to the detriment of SI or its clients. It can also occur if an SI employee or affiliate acts for personal benefit to the detriment of another individual or organization, but where it does not directly injure SI.

Examples of fraud may include but are not limited to:

- Misappropriation or inappropriate use of funds, supplies, or other assets;
- Forgery or alteration of a check, bank draft, or any other financial document;
- Forgery or alteration of any other document or record belonging to SI;
- Impropriety in the handling or reporting of money or financial transactions;
- Profiting because of insider knowledge of organizational activities;

Fraud is not tolerated under any circumstances and must be reported immediately, even if it is only suspected. Employees and affiliates should not take it upon themselves to investigate an allegation or suspected case of fraud. SI employees and affiliates who report suspected or alleged fraud in good faith will not suffer retaliation, even if fraud was not found or proven upon investigation.

## 10. Bribery and Kickbacks

Employees and affiliates are prohibited from participating in bribery or kickbacks in any form. A bribe occurs when someone gives, offers, or promises anything of value to a public official (or someone selected to be a public official), or someone acting on behalf of a public official, with the intent to influence an official act of that official to collude in or allow any fraud on the United States. Bribes can also occur when gifts or gratuities are given to a private individual as a means of improperly inducing business. A kickback is any money, fee, credit, gift, gratuity, thing of value, or compensation of any kind that is provided, directly or indirectly, for the purpose of improperly obtaining or rewarding favorable treatment in connection with the receipt of awarding of contracts, purchase orders, funds, or resources.

Bribery in connection with any SI award, contract, or subcontract is strictly prohibited. Offering or accepting kickbacks under any circumstances is also strictly prohibited.

SI does not pay money or make use of gifts (gratuities, favors, services, commissions, discounts, entertainment, hospitality, loans, forbearance, or items having monetary value) to obtain or retain business.

SI employees and affiliates are strictly prohibited from paying money in any amount or providing gifts to a government official of the United States or any foreign government to induce the official to help SI obtain or retain work. SI employees and affiliates are further prohibited from encouraging or permitting an actual or potential subcontractor, agent, or representative to make

a payment or provide gifts as described above. Any employee or affiliate found to have engaged in such prohibited actions will be subject to termination of employment or affiliate agreement/contract and may be subject to criminal prosecution.

Employees and affiliates may not solicit or accept gifts, meals, entertainment, personal discounts, travel and transportation, lodging, goods, cash, services, or other favors from current or potential business partners, suppliers, subcontractors, vendors, or other business acquaintances.

The Foreign Corrupt Practices Act (FCPA) prohibits American companies from bribing or attempting to bribe foreign officials, political candidates, or political parties in order to assist the companies in obtaining business.

The FCPA also requires strict reporting of all payments to officials in a foreign country, except where this is specifically permitted by the terms of an award/contract and is done in accordance with its terms and conditions. Employees and affiliates must maintain records of all payments and fully inform supervisors and managers of all payments to government officials and representatives of foreign governments to ensure proper compliance with laws and regulations. The HQ Contracts Division is responsible for explaining this policy when negotiating or arranging for US and host-country subcontracts, agency relationships, host government agreements, and similar arrangements to ensure that financial arrangements between SI and the other party do not lead or appear to lead to an improper payment. You may also contact the Chief Compliance and Ethics Officer when in doubt.

Local officials or contractors may approach SI representatives with offers to help SI in exchange for some action or service, stated or implied. Such approaches must be politely but firmly rebuffed, and, if they persist, reported to the Chief Compliance and Ethics Officer. An employee or affiliate who is solicited for money, favors, or anything of value by or on behalf of a government official to influence or reward an official decision must report the incident to Chief Compliance and Ethics Officer immediately.

## 11. Gifts, Meals, and Hospitality

Gift giving to US government personnel is governed by complex laws and regulations concerning acceptance of entertainment, meals, gifts, gratuities and other things of value from firms and persons that these agencies do business with or upon which they exercise regulatory authority. With few exceptions, US Government agencies have strict prohibitions against their employees accepting any such business courtesies.

Therefore, except as otherwise permitted by law or regulation, we are prohibited from offering or providing any business courtesy, including meals, entertainment, travel, lodging expenses, or other thing of value to any US Federal Government employee or representative – unless the provision of such is specifically authorized by the terms of an award/contract issued by the client to SI. Modest refreshments offered or received on an occasional basis in conjunction with business activities – are acceptable.

If you deal with representatives of a particular Federal agency, you are responsible for complying with that agency's standards of conduct. Where there is a question as to an agency's requirements under its standards of conduct, you must contact the Chief Compliance and Ethics Officer in advance for guidance. Similarly, those who deal with US state or local government

officials are responsible for knowing and adhering to the rules that may apply to such state or local government employees. Generally, such officials are often under prohibitions similar to those of US Federal Government employees.

We may provide meals, refreshments, or entertainment of reasonable value to non-government persons in support of business activities, provided the business courtesy is not offered as a "quid pro quo", (offered for something in return for the courtesy), or the courtesy does not violate any law, regulation, or the standards of conduct of the recipient's organization. It is our responsibility to inquire about prohibitions or limitations of the recipient's organization before offering any business courtesy. The courtesy must be consistent with marketplace practices, infrequent in nature, and not lavish or extravagant. It cannot cause embarrassment or reflect negatively on our reputation if it were to become known.

Employees of national and local governments are subject to a wide variety of different laws and regulations. We must consult our location's policies as well as applicable laws and regulations prior to offering anything to such employees. If you have questions, consult the Chief Compliance and Ethics Officer. In instances where customs in certain countries require the exchange of gifts, the company will, to the extent permitted, provide the gift. Gifts and entertainment, when such have been approved by the appropriate SI official (see the Authorities Matrix), are not allowable costs either as direct or indirect expenses. Any gifts, other than those of nominal value, received from representatives of foreign governments or agencies will become company property.

## 12. Conflicts of Interest

A conflict of interest exists when an SI employee or affiliate has a personal interest, either directly or indirectly, in an SI business decision or transaction that might impair, or even appear to impair, the individual's ability to make objective and fair decisions when performing his or her job. SI employees and affiliates are expected to carry out business activities, perform duties and exercise judgment on behalf of SI objectively and in the interest of SI. Conflicts of interest can also arise from personal or business relationships with individuals who may have or could provide information that may not be available to a competitor, commonly referred to as "inside information." Any situation that can influence or impair an SI employee's or affiliate's judgment or decision-making is a conflict of interest.

Below are a few examples of situations where a conflict of interest may arise:

- Employing a family member or participating in the selection process of a family member.
- Awarding or participating in the procurement process of a business that is wholly or partially owned by the SI employee or affiliate or by a family member of an SI employee or affiliate.
- Working at a second job, volunteering at another organization, owning/managing your own business, serving on the board of directors of another organization
- Accepting gifts from vendors, sub-contractors or other organizations that provide, or potentially could provide SI with goods and services.
- Using your SI work position or information accessed due to your relationship with SI for direct or indirect personal gain.

**Outside employment or owning/managing your own business:**

Outside employment is permissible if it does not interfere, compete, or conflict with the Company's interests, and provided it does not hinder the employee's ability to meet the responsibilities and demands of Company required work.

A fulltime SI employee who is employed elsewhere or owns/manages his/her own business must document this relationship and have a memo placed in their employment file to document that SI is aware of the relationship, the Chief Compliance and Ethics Officer and the Director, Human Resources (HR) have vetted it and has determined that given the information provided by the employee and the employee's current performance, no conflict of interest exists.

**Volunteer / Board of Directors:**

SI encourages you to volunteer and SI does not object to serving on a Board of Directors of another entity so long as it does not present a conflict of interest and does not conflict with your work responsibilities as determined by the Chief Compliance and Ethics Officer and the Director of HR.

If in doubt, please check with the Chief Compliance and Ethics Officer. If a conflict cannot be avoided, it must be managed in an ethical, responsible manner and so as not to create the perception of impropriety. SI will gladly place a memo to the employee's or affiliate's file about a situation that was vetted by the Chief Compliance and Ethics Officer and the Director of HR and determined not to be a conflict of interest.

## 13. Intellectual Property and Assets

Employees and affiliates have a responsibility to protect sensitive, proprietary and/or confidential information obtained or developed while doing business. Employees and affiliates are not to disclose SI's sensitive, confidential, or proprietary information or that of its employees, affiliates, or clients.

This may include, but is not limited to, information about trademarks and copyrights, and other intellectual property as well as upcoming projects, new business strategies and proposal materials, sales, finances, company strategy, future business performance, business plans, candidate/applicant data, personnel information, personal medical and health information or any other information not publicly released by SI or personal in nature. When an employee or affiliate leaves SI, his/her responsibility to protect SI's information continues. Documents and records that are the property of the company must remain at SI and may not be copied.

SI reserves the right to take legal action if sensitive, proprietary and/or confidential information is disclosed without permission. Similarly, SI does not seek to use the confidential or proprietary information of other companies unless permission is obtained from the entity in question.

Due to the nature of SI's work, certain employees and affiliates may have access to sensitive and/or confidential US Government information, including policy-sensitive information and procurement sensitive information. Employees and affiliates with access to such information shall not disclose or use, either during or after the term of engagement with SI, any such information except to the extent required to perform the duties of a given assignment or to the extent required by legal due process.

Employees and affiliates must comply with all applicable US Government and/or client security requirements.

SI employees and affiliates have a responsibility to protect SI assets, both physical and intellectual, against theft, waste, and misuse. SI assets must be used for business activities only. Requirements for confidentiality do not apply to legal requirements to report fraud, waste, and abuse of client funds.

Questions regarding what constitutes Intellectual Property or Assets may be directed to the Chief Compliance and Ethics Officer.

## 14. Fair Competition

SI believes that lasting customer relationships are built on integrity and trust. We seek to gain an advantage over our competitors through superior services. We must never seek to win business through improper or questionable business practices. Truthful and accurate communication about our services is essential to meeting our responsibilities to our customers. We must be honest in marketing, in preparing bids and proposals based on current, accurate, and complete technical as well as cost and pricing data, and in negotiating contracts.

SI believes that competition, whether for government or commercial work, must be fair and honest. To that end, SI's employees and affiliates must refrain from gathering competitor intelligence by illegitimate means and refrain from acting on knowledge that has been gathered in such a manner. In addition, SI's employees and affiliates shall seek to avoid exaggerating or disparaging comparisons of the services and competence of their competitors.

SI is committed to full compliance with antitrust laws that prohibit unlawful or unreasonable restraint of trade and competition. Generally, antitrust laws prohibit agreements or actions that restrain trade, such as restrictive practices that may reduce competition without providing benefits to consumers. Common antitrust practices include agreements and understandings among competitors to "fix" or "rig" bids; to fix or control prices; to boycott specific suppliers or customers; to allocate geographic territories to certain companies or to limit the production or sale of products for the purpose of reducing competition. These types of arrangements are against public policy, in violation of the antitrust laws, and against SI's Standards. Contracts or other arrangements that involve exclusive dealing, tie-in sales (tying one product to the purchase of another product), or other restrictive agreements, may also be unlawful under antitrust laws.

Because of the complexity of antitrust laws, any suspected noncompliance in this area should immediately be brought to the attention of the Chief Compliance and Ethics Officer.

## 15. Procurement Integrity

US Government procurement integrity regulations are designed to ensure that contractors receive no unfair advantage when competing for US Government contracts. With respect to all government contracts, subcontracts, and related transactions, SI employees and affiliates must strictly avoid any conduct that may violate the integrity of the Federal Procurement process. SI requires that its employees and affiliates strictly avoid any conduct that may violate the integrity

of the Federal Procurement process. SI, its employees, and its affiliates may not, directly or indirectly:

- Offer, give, or promise to any government official any money, gratuity, gift, bribe, kickback, or other thing of value.
- Solicit or obtain, prior to contract award, any proprietary or source selection information from any government official.
- Disclose proprietary or source selection information to any person outside of SI other than an individual authorized by the Contracting Officer to receive such information.
- Engage in employment discussions with a procurement official, or make an offer or promise of future employment, or a future business opportunity, to a procurement official.
- Make inaccurate representations with respect to Company size, status, affiliation, or cost or pricing information.

An employee or affiliate's assignment through SI may call for him/her to furnish services in support of the evaluation or design of US Government-funded activities. Such employees and affiliates may be ineligible to furnish services connected with the implementation of the same activity or substantive derivations thereof unless duly authorized.

Failure to disclose participation in evaluation or design activities when required by US Government policy and Federal law may result in criminal liability, and SI employees and affiliates providing design and evaluation services are cautioned to remain aware of US Government ethics regulations beyond their engagement with SI.

The laws and regulations concerning hiring present and former US Government employees are complex. Among other things, the rules: (1) prohibit contractors from making offers to or discussing post government employment or business opportunities with government procurement officials participating in a solicitation on which a company is bidding or offering; (2) prohibit government officials from participating in a government matter involving any firm with whom the official is negotiating or has an arrangement concerning future employment; and (3) prohibit certain post-government employment activities, including representation of a contractor before the US Government on a matter in which the employee participated personally and substantially while a government employee.

If you want to interview, negotiate with, or make any offer to a present or former government employee, you must first discuss the matter with the HQ Director of Human Resources (HR), providing all the pertinent details. Only after you receive approval from the HQ HR Director may you begin any discussions or negotiations, and only within any the limits established by the HQ HR Director.

## 16. Accurate Reporting of Time Worked and Other Costs

For SI, accurately charging labor, travel, material, and other costs is essential to maintaining the integrity of customer billings, financial reporting, and planning. Deliberate mischarging of work time or timecard fraud violates SI Standards and the law.

Knowingly charging an unauthorized account or cost objective, or knowingly approving such mischarging, or shifting of costs to an improper account, is prohibited. Each employee is responsible for ensuring that labor, travel, material, and other expenses are recorded truthfully

and accurately. These costs include, but are not limited to, normal contract work, work related to independent research and development, and bid and proposal activities.

The Finance Division should be contacted if an employee has questions or concerns about proper charging of labor and other costs.

## 17. Political Activities

SI employees and affiliates are welcome, even encouraged, to participate in the political process so long as this participation takes place outside of work hours. Employees and affiliates must also take care that this participation is done as a private citizen and not as a representative of SI. As a policy, SI does not contribute to any political organizations.

Additionally, the Byrd Amendment prohibits the use of appropriated funds to pay any person for influencing or attempting to influence officials of the executive or legislative branches (including members of Congress and their staff) of the US Government in connection with the award or modification of US Government contracts and assistance instruments.

## 18. Harassment

### **Equal Employment Opportunity**

SI is committed to achieving and maintaining a diverse and representative workforce and a workplace free of discrimination. SI embraces the principles of equal employment and complies with ILO standards related to equal opportunities, fair pay, prohibition of forced and child labor, non-discrimination and gender equality practices. It is SI's policy to comply with all federal, state, and local laws providing equal employment opportunities, and all other employment laws and regulations. It is our intent to maintain an environment which is free of harassment, discrimination, or retaliation because of age (40 and over), race, color, national origin, ancestry, religion, sex, sexual orientation, gender identity or expression, pregnancy (including childbirth, lactation, and related medical conditions), physical or mental disability, genetic information (including testing and characteristics), veteran status, uniformed service member status, or any other status protected by federal, state, or local laws. SI is dedicated to the fulfillment of this policy regarding all aspects of employment and procurement, including but not limited to recruiting, hiring, placement, transfer, training, promotion, rates of pay, and other compensation, termination, and all other terms, conditions, and privileges of employment or affiliation.

SI will conduct a prompt and thorough investigation of all allegations of discrimination, harassment, or retaliation, or any violation of SI's Equal Employment Opportunity Policy in a confidential manner. SI will take appropriate corrective action, if and where warranted. SI prohibits retaliation against any employee or affiliate who provides information about, complains, or assists in the investigation of any complaint of discrimination or violation of this Equal Employment Opportunity Policy.

We are all responsible for upholding SI's Equal Employment Opportunity Policy and any claimed violations of that policy should be brought to the attention of the Director of Human Resources.

### **Policy Against Harassment**

SI has a zero tolerance policy against all types of harassment, including sexual harassment and other forms of harassment based upon an individual's age (including age 40 and over), race, color, national origin, ancestry, religion, sex, sexual orientation, gender identity or expression, pregnancy (including childbirth, lactation, and related medical conditions), physical or mental disability, genetic information (including testing and characteristics), veteran status, uniformed service member status, or any other status protected by federal, state, or local laws. All forms of harassment of, or by, employees or affiliates are strictly prohibited and will not be tolerated.

### **Sexual Harassment**

Sexual harassment is defined as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when (1) submission to such conduct is made either explicitly or implicitly as a term or condition of an individual's employment or procurement (2) submission to, or rejection of such conduct by an individual is used as the basis for employment or procurement decisions affecting such individual 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 work environment.

While it is not possible to identify each and every act that constitutes or may constitute sexual harassment, the following are some examples of sexual harassment are provided below: (a) unwelcome requests for sexual favors; (b) lewd or derogatory comments or jokes; (c) comments regarding sexual behavior or the body of another employee; (d) sexual innuendo and other vocal activity such as catcalls or whistles; (e) obscene letters, notes, emails, invitations, photographs, cartoons, articles, or other written or pictorial materials of a sexual natures; (f) repeated requests for dates after being informed that interest is unwelcome; (g) retaliating against an employee or affiliate for refusing a sexual advance or reporting an incident of possible sexual harassment to Social Impact or any government agency; (h) offering or providing favors or employment benefits such as promotions, favorable evaluations, favorable assigned duties or shifts, etc., in exchange for sexual favors; and (i) any unwanted physical touching or assaults, or blocking or impeding movements.

### **B. Other Harassment**

Other workplace harassment is often verbal or physical conduct that insults or shows hostility or aversion towards an individual because of the individual's age (40 and over), race, color, national origin, ancestry, religion, sex, sexual orientation, gender identity or expression, pregnancy (including childbirth, lactation, and related medical conditions), physical or mental disability, genetic information (including testing and characteristics), veteran status, uniformed service member status, or any other status protected by federal, state, or local laws.

Again, while it is not possible to list all the circumstances that may constitute other forms of harassment, the following are some examples of conduct that may constitute workplace harassment: (a) the use of disparaging or abusive words or phrases, slurs, negative stereotyping, or threatening, intimidating or hostile acts that relate to the above protected categories; (b) written or graphic material that insults, stereotypes or shows aversion or hostility towards an individual or group because of one of the above protected categories and that is placed on walls, bulletin boards, email, voicemail, or elsewhere on Social Impact's premises, or circulated in the workplace; and (c) a display of symbols, slogans, or items that are associated with hate or intolerance towards any select group.

### **Reporting Discrimination and Harassment**

Any employee or affiliate who feels that he or she has witnessed, or been subject to, any form of discrimination or harassment is required to immediately notify the Director of Human Resources. SI prohibits retaliation against any employee who provides information about, complains, or assists in the investigation of any complaint of harassment or discrimination.

## 19. Child Protection/Safeguarding

SI supports the goals of the UN Convention on the Rights of the Child ([www.unicef.org](http://www.unicef.org)), host country and local child welfare and protection legislation or international standards, whichever gives greater protection to children from abuse, exploitation, and violence.

SI is committed to protecting children (defined as those who have not attained 18 years of age) from abuse, exploitation, and neglect:

- Child abuse, exploitation, or neglect constitutes any form of physical abuse; emotional ill-treatment; sexual abuse; neglect or insufficient supervision; trafficking; or commercial, transactional, labor, or other exploitation resulting in actual or potential harm to the child's health, well-being, survival, development, or dignity. It includes but is not limited to: any act or failure to act which results in death, serious physical or emotional harm to a child, or an act or failure to act which presents an imminent risk of serious harm to a child.
- Physical abuse constitutes acts or failures to act resulting in injury (not necessarily visible), unnecessary or unjustified pain or suffering without causing injury, harm or risk of harm to a child's health or welfare, or death. Such acts may include, but are not limited to: punching, beating, kicking, biting, shaking, throwing, stabbing, choking, or hitting (regardless of object used), or burning. These acts are considered abuse regardless of whether they were intended to hurt the child.
- Sexual Abuse constitutes fondling a child's genitals, penetration, incest, rape, sodomy, indecent exposure, and exploitation through prostitution or the production of pornographic materials.
- Emotional abuse or ill treatment constitutes injury to the psychological capacity or emotional stability of the child caused by acts, threats of acts, or coercive tactics. Emotional abuse may include, but is not limited to: humiliation, control, isolation, withholding of information, or any other deliberate activity that makes the child feel diminished or embarrassed.
- Exploitation constitutes the abuse of a child where some form of remuneration is involved or whereby the perpetrators benefit in some manner. Exploitation represents a form of coercion and violence that is detrimental to the child's physical or mental health, development, education, or well-being.
- Neglect constitutes failure to provide for a child's basic needs within SI activities that are responsible for the care of a child in the absence of the child's parent or guardian.

SI employees and affiliates shall not undertake abusive, exploitative and neglectful behaviors towards children and shall avoid situations that constitute poor practice and which could contribute towards abusive, exploitative or neglectful behavior.

SI holds employees and affiliates to the highest of standards - even if a given behavior or act is not illegal in the host country. The examples and behaviors below are not exhaustive.

**Unacceptable behaviors:** SI employees and affiliates shall never:

- physically assault children;
- physically abuse children;
- develop sexual relationships with children;
- develop inappropriate relationships with children;
- act in ways that could put a child at risk of abuse or exploitation;

- use language, make suggestions or offer advice which is inappropriate, offensive or abusive;
- behave in a manner which is inappropriate or sexually provocative;
- condone, or participate in, behavior of children which is illegal, unsafe or abusive;
- shame, humiliate, belittle or degrade children, or otherwise perpetrate any form of emotional abuse;
- show differential treatment, or favor particular children to the exclusion of others;
- discriminate against a child;
- view, make or distribute child pornography.

**Care of environment:** SI employees and affiliates will take special care when working with or around children:

- ensure that a culture of openness exists so that staff, affiliates and others are not afraid to raise concerns;
- ensure that children understand their rights and what is/not acceptable behavior of adults or other children and know who to contact if they have any concerns;
- plan and organize work to minimize risks;
- be aware of and manage situations which may present risks;
- when working with or around children: no adult should ever be alone with a minor and out of sight of others. Exercise the “two adults” rule, ensuring that two adults are present always, or at a minimum ensure an adult’s interaction with a child is within full view of others;
- acquire permission of child/parent/caregiver before any image of a child is used for publicity, fundraising or awareness campaigns;
- Ensure that parents or legal guardians are informed and give their authenticated written consent for the collection of information;
- Information that identifies the location of a child and therefore could put them at risk will not be put in communications.

SI does not allow the recruitment and/or hiring of children in order to carry out SI activities.

## 20. Sexual Exploitation and Abuse

Sexual exploitation and sexual abuse constitute acts of serious misconduct and are grounds for disciplinary measures, including dismissal.

- Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief 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 by SI employees and affiliates.
- Sexual relationships between SI employees and affiliates and the individuals with whom SI works, since they are based on inherently unequal power dynamics, undermine the credibility and integrity of the work of SI and are strongly discouraged.
- Sexual relations with a direct report or anyone within the reporting line is prohibited.
- SI employees and affiliates are obliged to create and maintain an environment that prevents sexual exploitation and sexual abuse. Managers at all levels have a responsibility to support and maintain this environment.

## 21. Trafficking in Persons

SI is committed to protecting vulnerable populations from trafficking. SI has a zero-tolerance policy regarding trafficking in persons including the trafficking-related activities.

Trafficking in persons includes the recruitment, transportation, transfer, harboring or receipt of persons, by means of the 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 includes, but is not limited to, 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.

Specifically, SI employees and affiliates may not traffic in persons, procure commercial sex acts, use forced labor in the performance of SI activities or engage in acts that directly support or advance trafficking in persons. This includes but is not limited to the following acts:

- engaging in severe forms of trafficking in persons, including sex trafficking in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age; or the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery;
- procuring commercial sex acts;
- using forced labor;
- destroying, concealing, confiscating, or otherwise denying an employee access to that employee's identity or immigration documents;
- using misleading or fraudulent practices during the recruitment of employees or offering of employment, such as failing to disclose, in a format and language understood by the employee or potential employee, basic information or making material misrepresentations during the recruitment of employees regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, the living conditions, housing and associated costs (if employer or agent provided or arranged), any significant costs to be charged to the employee or potential employee, and, if applicable, the hazardous nature of the work;
- using recruiters that do not comply with local labor laws of the country in which the recruiting takes place
- 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: a) exempted from the requirement to provide or pay for such return transportation by the terms of an award/contract; or b) 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 purpose of employment, or offering employment, by means of materially false or fraudulent pretenses, representations, or promises regarding that employment;
- charging employees recruitment fees;
- providing or arranging housing that fails to meet the host country housing and safety standards;
- if required by law or contract, failing to provide an employment contract, recruitment agreement, or other required work document in writing. Such written work document shall be in a language the employee understands. If the employee must relocate to perform the work, the work document shall be provided to the employee at least five days prior to the employee relocating. The employee's work document shall include, but is not limited to, details about work description, wages, prohibition on charging recruitment fees, work location(s), living accommodations and associated costs, time off, roundtrip transportation arrangements, grievance process, and the content of applicable laws and regulations that prohibit trafficking in persons.

SI fully supports the United States Government's policy prohibiting trafficking in persons and trafficking-related activities. SI employees must understand the US Government's policy prohibiting trafficking-related activities described above and in paragraph (b) of FAR 52.222-50 Combating Trafficking in Persons clause, the activities prohibited, and the actions that will be taken against the employee for violations. Additional information about Trafficking in Persons and examples of awareness programs can be found at the website for the Department of State's Office to Monitor and Combat Trafficking in Persons at <http://www.state.gov/j/tip/>. Questions about the content of this clause must be raised to SI's Chief Compliance and Ethics Officer and the HQ HR Director.

SI is committed to cooperate fully with the US Government in investigating trafficking in persons matters, including, but not limited to:

- Disclose to the agency Inspector General information sufficient to identify the nature and extent of an offense and the individuals responsible for the conduct;
- Provide timely and complete responses to Government auditors' and investigators' requests for documents;
- Cooperate fully in providing reasonable access to its facilities and staff (both inside and outside the U.S.) to allow contracting agencies and other responsible Federal agencies to conduct audits, investigations, or other actions to ascertain compliance with the Trafficking Victims Protection Act of 2000 (22 U.S.C. chapter 78), E.O. 13627, or any other applicable law or regulation establishing restrictions on trafficking in persons, the procurement of commercial sex acts, or the use of forced labor; and
- Protect all employees suspected of being victims of or witnesses to prohibited activities, prior to returning to the country from which the employee was recruited, and shall not prevent or hinder the ability of these employees from cooperating fully with Government authorities.

SI employees and affiliates can also report, without fear of retaliation, activity inconsistent with the policy prohibiting trafficking in persons to the Global Human Trafficking Hotline at 1-844-888-FREE and its email address at [help@befree.org](mailto:help@befree.org).

## 22. Communications

All written and verbal communications whether internal or external must be conducted with a professional and respectful tone. Employees and affiliates should limit discussions about individuals, people, countries, organizations, competitors, and clients to the business context and conduct them in an appropriate, non-slanderous, and professionally acceptable manner.

### **Media Relations**

The SI Division Heads with final approval from the Executive Vice President are responsible for all aspects of SI's US media relations, and with input from relevant staff she/he is the primary media contact, and determines whether to respond to media coverage and inquiries on a case-by-case basis. Employees or affiliates who receive an inquiry from US media about SI or its projects should immediately refer the inquiry to the Division Head. US-based staff are not to engage in discussions with the media on behalf of SI without first obtaining approval from the Division Head. Inquiries from non-US (local) press, should be handled by the Chief of Party in coordination with the Division Head (or the Division Head directly if there is no Chief of Party) and with final approval from the Executive Vice President.

### **Online Communications and Social Media Guidelines**

If employees or affiliates publish any content to any Web site outside SI, and it is related to their work with SI or subjects associated with SI, they should coordinate with the Communications & Special Projects Assistant.

Employees should follow the published [SI Social Media Guidelines](#). Affiliates should request these guidelines from the Communications & Special Projects Assistant.

### **SI's Brand and Logo**

Use of the SI logo or branding should conform with the [SI Branding Guide](#). Affiliates should request these guidelines from the Communications and Special Projects Assistant.

### **Presentations and Publications**

Employees and affiliates must coordinate with the Division Head to ensure that the format, structure, and messaging of any presentations and publications dealing with SI's work adheres to corporate standards and those of any applicable client(s). If an employee or affiliate is to be compensated for a presentation or publication dealing with SI's work, the employee must first obtain the approval of the Chief Compliance and Ethics Officer and the HQ HR Director.

## 23. Information Technology

SI provides a variety of information technology resources. All employees and affiliates are responsible for using these resources with care and in an ethical manner that reflects the company's values and policies.

SI's e-mail, telephone, voice mail, fax, Internet, and other technology resources are company property, and SI reserves the right to monitor and examine all communications over these resources at its discretion. Accordingly, employees and affiliates should not have any expectation of privacy as to their email, internet or technology resource usage and should not use these resources for information they wish to keep private.

These resources should be used primarily for SI-related business. SI employees and affiliates may make incidental personal use of email, voice mail, fax, and Internet services if it does not impede normal job performance, incur indirect or direct costs, compromise proprietary information and security or violate any of SI's standards, policies and guidelines.

Federal and State law and SI's Standards on intellectual property, misuse of company property, discrimination, harassment, sexual harassment, information and data security, and confidentiality apply to the use of all the company's technology resources.

SI email users must not state or give the impression that the user is representing or making statements on behalf of SI unless the user is authorized to do so.

# SI Standards of Business and Ethical Conduct

## Employee Acknowledgement

I hereby certify that I have read SI's Standards of Business and Ethical Conduct. I understand and agree to abide by them. I also understand that the Chief Compliance and Ethics Officer and the Compliance & Ethics Hotline are available to me should situations arise that cause me to be uncertain about Company policy. I realize that any violations of the standards may lead to disciplinary action, up to and including immediate termination of employment.

\_\_\_\_\_  
Name (*Please Print*)

\_\_\_\_\_  
Location

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

# SI Standards of Business and Ethical Conduct

## Affiliate Acknowledgement

I hereby certify that I have read SI's Standards of Business and Ethical Conduct ([www.socialimpact.com](http://www.socialimpact.com)).

I understand and agree to abide by the standards. I also understand that the Chief Compliance and Ethics Officer and the Compliance & Ethics Hotline are available to me should situations arise that cause me to be uncertain about SI policy.

Compliance & Ethics Hotline via phone – (703) 562-9137

Compliance & Ethics Hotline via email - [compliance@socialimpact.com](mailto:compliance@socialimpact.com)

I realize that any violations of the standards may lead to termination of my relationship or contract with SI.

\_\_\_\_\_  
Name (*Please Print*)

\_\_\_\_\_  
Location

\_\_\_\_\_  
Title and Company (*If Applicable*)

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date