Code of Business Ethics and Conduct
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### Part 7: Enforcement

**Code of Business Ethics and Conduct**
Part 1: Commitment to Our Principles

Twenty years ago, the United Nations member states signed the Palermo Protocol, a symbol of universal commitment to combating slavery and trafficking. Since then, the global community has made much progress. At GFEMS, we seek to build on that progress while looking ahead to the next twenty years of the fight. Our work galvanizes greater collaboration in the field and drives towards a global coherent strategy to end modern slavery.

Significant progress has been made in some areas of the anti-trafficking field. In the past few years especially, there has been an active effort to incorporate survivor input into global programming, marking a shift towards inclusive strategies and decision making. At the Global Fund to End Modern Slavery (GFEMS), our team has built this prioritization of survivor voices into our Values.

The Fund’s Values allow us to transcend self-interest and inspire us to do what is right, even when the right thing is hard to do. Our Values inform this Code of Conduct.

Our Code is not intended to make us experts on every issue, but rather to help us spot risks, obtain guidance and make good choices. While this document is designed for GFEMS and partners, it should help donors and other stakeholders understand the standards that guide the Fund’s work.

Please join me in affirming our commitment to work ethically and collaboratively, listen to one another and our stakeholders, and hold ourselves accountable not only for what we do but also for how we do it.

Alex Thier, CEO
**Mission**

The Global Fund to End Modern Slavery (GFEMS) works to dismantle the systems that perpetuate modern slavery. To do this, we mobilize new and diverse funding. We collaborate with governments, the private sector, philanthropists, and civil society. And we invest in solutions that are scalable and sustainable.

**Values**

We often have much more discretion to make decisions than we think we do. Many decisions are often shades of gray, not black and white. In those areas of discretion, there is an expectation that we apply our GFEMS values to do the right things in the right ways.

Staying responsive and flexible to stakeholder needs while upholding the Fund’s Mission and Values is a foundation for our work. Creativity, adaptability, and a commitment to operational integrity are integral to reducing risk while safeguarding our work, our brand, and the people we work with and for.

**Integrity and Compliance**

The Fund’s Integrity and Compliance Program is focused on helping the organization maintain responsible and effective corporate governance and ethical conduct. It is designed to anticipate and respond to challenges that may arise as we pursue our mission. Without a structure, and associated tools and resources, we expose ourselves to risk.

The Integrity and Compliance Program aims to accomplish two big things:

1. **Integrity**: Define what it means to do the right thing at GFEMS by putting the Fund’s values into practice to set the standards of behavior across our organization.
2. **Compliance**: Support the development of processes, procedures, and tools to ensure the GFEMS team follows those standards.

**Code of Business Ethics and Conduct**

**GFEMS Organizational Values**

**FOCUS ON OUR MISSION**

We build programs and undertake research focused on ending modern slavery.

**LEARN CONTINUOUSLY**

We seek out the knowledge and perspectives of others, especially those whom we seek to serve and empower.

**BET BIG AND BUILD TOGETHER**

We build and co-develop bold, transformative programs designed to achieve unprecedented systems change, emphasizing innovation and scale.

**EXECUTE WITH EXCELLENCE AND INTEGRITY**

We are committed to implementing with efficiency, effectiveness, and real-time adaptability, while maintaining the highest standards of business ethics and compliance.

**SHARE WHAT WE KNOW**

We eagerly share successes and lessons learned to bolster the field, build the evidence base, and catalyze a coherent global strategy.

**CREATE SUSTAINABLE IMPACT**

We identify and leverage shared goals among diverse stakeholders to secure co-investment and build programs that are self-sustaining.

**VALUE OUR PEOPLE**

We provide a supportive, respectful, and equitable environment for our team to advance the Fund’s mission.
PART 2 COMMITMENT TO REPORTING

Commitment to the Code
Preserving the trust of our stakeholders is our shared responsibility. The Code is designed to help each of us continue to meet this responsibility.

This Code covers the conduct of all GFEMS personnel regardless of their employment status or location, as well as the conduct of the Fund’s Board of Directors in the execution of their governance duties and responsibilities. This Code is a supplement to the Board Operating Procedures. The Code also covers the conduct of GFEMS implementing partners and contractors. Together, these personnel and third-party partners constitute the GFEMS team (“GFEMS team”) for the purpose of this Code.

The principles and policies established by this Code apply 24 hours a day, 365 days per year.

This Code outlines the Fund’s high expectations for how we work around the world. Each of us must commit to understanding this Code and to abiding by these principles:

■ To act honestly, truthfully, and with integrity in all our transactions and dealings.
■ To avoid conflicts of interest and appropriately handle actual or apparent conflicts of interest in our relationships.
■ To treat stakeholders fairly, and with dignity and respect.
■ To treat colleagues with respect, fairness, and good faith and to provide conditions of employment that safeguard their rights and welfare.
■ To be a good corporate citizen and to comply with both the spirit and the letter of the law.
■ To act responsibly toward and for the benefit of the communities we work with.
■ To encourage the accountability, transparency, ethical conduct, and effectiveness of the field.
■ To report concerns free from any fear of retaliation.

The Code represents the practical ways that we put our Values to work every day.

MANAGERS
A critical element of our Compliance Program is the tone at the top.

The atmosphere that GFEMS leadership creates will shape GFEMS team behavior. If leadership upholds high standards of ethics and integrity, the GFEMS team will be more inclined to uphold those same values. In addition to the principles outlined above, managers have a specific responsibility to lead by example.

Managers are often the first point of contact for questions or concerns, so managers must encourage communication, educate themselves on our compliance resources and processes, and be prepared to escalate concerns when necessary. Managers must also model ethical behavior and embody our values.

INDIVIDUALS

■ Read and understand this Code.
■ Think about how the Code applies to your role and consider how you might handle situations to avoid improper, illegal, or unethical actions.
■ Consult the “Q&A” examples included here since they deal with common questions and situations. If you have questions or need clarification, ask your manager or contact one of the resources listed within the Code.
■ Be proactive when a situation raises a “red flag” or troubles your conscience. Do not ignore your concerns.
■ Speak up about violations of our Code, our policies, or the law.

Code of Business Ethics and Conduct
Ethical Dilemmas

We will encounter situations that will test our judgment and integrity. When faced with an ethical dilemma, we need to be able to recognize it as an ethical issue and rely on this Code and advice from GFEMS resources listed within this document to do what is right. Here are some red flags that may indicate an ethical issue:

■ Are you or someone trying to keep it a secret?
■ Is it something GFEMS would not want to share publicly on social or news media?
■ If it was made public, would you feel comfortable explaining it to colleagues or even investigators?
■ Is your judgement impartial, or do you have a personal stake in the outcome that makes you less objective?

Before making a decision or pursuing a course of action, consider the following:

■ Ask yourself, does the decision or action meet the letter and spirit of the Code and other GFEMS policies and procedures? Is it legal?
■ Read the policy language. If you are unsure if the policy applies, ask your manager or Leadership Team member or contact the Associate Director for Compliance and Operational Integrity.
■ If you suspect the decision or action violates the Code or other GFEMS policies, raise it. Do not say to yourself, “I don’t know.” You are not responsible for investigating violations of GFEMS policies; you are responsible for raising them.
Speak up
GFEMS encourages complaints, reports, or inquiries about illegal practices or violations of the Fund’s policies, including illegal or improper conduct by the organization itself, by its leadership, or by others on its behalf. Appropriate subjects to raise would include financial improprieties, accounting or audit matters, ethical violations, safeguarding concerns and policy violations, or other similar illegal or improper practices or misconduct.

GFEMS has zero tolerance for anyone who is found to report maliciously in order to knowingly make false accusations, complaints, reports, or inquiries. Appropriate disciplinary measures will be taken.

Subjects for reports include:
- Bribery and Kickbacks
- Child exploitation or neglect
- Code of Conduct violation
- FCPA Violation
- Financial Reporting and Accounting
- Fraud and Embezzlement
- Gifts and Entertainment
- Harassment and/or Discrimination
- Information Security
- Privacy
- Retaliation
- Substance Abuse
- Suggestions for Improvement
- Vision and Values
- Workplace Health and Safety
- Other

SPEAK UP
The Fund’s goal is to ensure that we observe the highest standards of ethics in the conduct of our duties and responsibilities, practice honesty and integrity in fulfilling our responsibilities, and comply with all applicable laws and regulations. We are bound to the Fund’s Code of Conduct and are urged to report violations or suspected violations of policy, regulation or law and ethical lapses.

Report fraud, waste or abuse and safeguarding violations related to the Fund’s operations. Anonymous and confidential.

Report The Incident

IntegrityCounts, powered by WhistleBlower Security, is an independent third party administrator.

Making Good Companies Better

gfems@integritycounts.ca
www.integritycounts.ca/org/gfems

Code of Business Ethics and Conduct
Channels for asking questions and reporting concerns

Concerns may be reported in person, via phone, by email, or through the Fund’s hotline:

- Anonymously and confidentially using the GFEMS hotline
  https://www.integritycounts.ca/org/gfems
  (phone numbers are found at this link)
- Directly to your Manager
- Directly to the Associate Director for Compliance and Operational Integrity
- Directly to the Associate Director of Human Resources
- Directly to the CEO
- If all of those persons above are implicated in the complaint, report or inquiry, it should be directed to the Fund’s Senior Director of Finance and Operations who may engage external legal counsel.

The GFEMS hotline, IntegrityCounts, is a third-party managed software that allows for direct or anonymous reporting to the Fund in many of the languages spoken by our stakeholders.

It is accessible 24 hours per day, 7 days per week, 365 days per year on a computer or smartphone device, or via toll-free telephone number.

The GFEMS team is encouraged to use our hotline to raise a concern anytime other reporting mechanisms stated above are not preferred. The GFEMS team should make sure our hotline is available for reporting by our stakeholders as well.

<table>
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<tr>
<th>Illustrative Common Issue</th>
<th>Applicable GFEMS Policy</th>
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</tr>
</tbody>
</table>
Anonymity and Confidentiality

Reporting persons are encouraged to provide their name when raising a concern. This allows those who respond to a concern to contact the reporting person if additional information is needed. Providing a name also helps the Fund ensure that the reporting person does not experience retaliation for making a good faith report. (There may be unique circumstances when disclosing your identity is required by law or is necessary to fully investigate and address your concern). If you choose to identify yourself when making a report through IntegrityCounts or another anonymous means, GFEMS will endeavor to keep your information confidential, sharing it only on a need-to-know basis among those directly handling or overseeing the issues you reported.

If you make a report anonymously through IntegrityCounts or another channel, it is important to provide detailed information. IntegrityCounts will assign you with a case number, and you should regularly check the site to respond to information requests from those handling the concern you reported. Cases that lack enough information to pursue may be closed.

Whistleblower Protection

GFEMS will not tolerate retaliation against anyone who, in good faith, reports a concern or participates in an investigation.

Anyone, regardless of position or tenure, found to have engaged in retaliatory conduct against someone who has raised an ethical or compliance concern will be subject to disciplinary action. If you feel you have been subjected to retaliation, you should report to the Hotline or directly contact the Fund's Associate Director for Human Resources or Associate Director for Compliance and Operational Integrity.

In addition to the Fund’s prohibition on retaliation, U.S. federal law prohibits any form of retaliation against any employee as a reprisal for disclosing information that the employee reasonably believes is evidence of gross mismanagement or waste of any federal funding received by GFEMS, an abuse of authority relating to a federal grant, cooperative agreement, or contract, a substantial and specific danger to public health or safety; or a violation of law, rule, or regulation related to a federal funding. If an employee believes that he/she has been retaliated against for a good faith disclosure of the type of conduct listed above, he/she may submit a complaint to the Inspector General of the appropriate U.S. federal agency. The employee’s rights and remedies may be found at 48 CFR 3.900.

Cooperation and Responsiveness

GFEMS takes all concerns seriously and will address all reports. The GFEMS team is required to cooperate with an internal review or investigation. Investigations of Code or other policy violations will be led by either the Associate Director for Compliance and Operational Integrity or the Associate Director of HR, depending on the nature of the concern, in coordination with other GFEMS business teams, legal counsel or third-party experts, as needed, while respecting the need for confidentiality. Out of respect for the privacy of individuals who may be affected by a report, GFEMS may be unable to share detailed results of an investigation and may not disclose what actions were taken in response. Whenever practicable, GFEMS will provide appropriate status updates. See the Fund's Internal Review Procedures for more on our internal review process.
PART 3 COMMITMENT TO HUMANITY

Violations
GFEMS will take appropriate action against any member of the GFEMS team who is found to be in violation of the Code or other GFEMS policies. Such action may include immediate termination of appointment, employment, or contract at the Fund’s sole discretion. Violations also may result in civil or criminal penalties beyond the Fund’s discipline.

PRACTICAL APPLICATION

Q I understand that I am to report violations of GFEMS policy and the law. However, I don’t want to be seen as a snitch, and I don’t want to get my friends in trouble. Can I just assume others know their jobs and are doing the right thing?

A The rule is “see something, say something.” Upholding the Fund’s high ethical standards is everyone’s job. A manager may not be aware of the inappropriate or unethical conduct. So you have a duty to point out to your colleague that her or his conduct is not appropriate. If that puts you in an uncomfortable or high-risk situation, then you must report it through any of the Fund’s reporting channels.

Q What if my supervisor is involved in what I perceive to be an unethical situation? What should I do? If I say something, I will get fired or, worse, my worklife will be made miserable until I quit.

A The Fund protects its employees with a strong policy regarding whistleblower protection and non-retaliation. Raising your concerns is part of being ethical, part of being a leader, part of being respectful to our stakeholders, and part of being accountable. If you do report an incident—blow the whistle—you will be protected from retaliation, both by our Code and by applicable law. Retaliation for doing the right thing is not tolerated at GFEMS.
PART 3  COMMITMENT TO HUMANITY

Anti-Trafficking

GFEMS understands that human trafficking is a crime and opposes to all forms of trafficking in persons. In addition to its mission and core work, the Fund is committed to mitigating the risk of trafficking in persons in connection with its operations, initiatives, and activities by its employees, interns, volunteers, independent contractors, recipients, and subrecipients alike. The Board of Directors and Leadership Team understand the centrality of anti-trafficking efforts for the Fund and have devoted resources towards innovative strategies to combat human trafficking.

GFEMS prohibits:

- Engaging in any form of human trafficking
- Engaging in commercial sex acts during or after work hours, while attending off-site functions, and any time in work travel status
- Using forced labor of any kind, for any reason
- Destroying, concealing, confiscating, or otherwise denying access by an employee to the employee’s identity or immigration documents
- Using misleading or fraudulent recruiting practices
- Charging employee candidates recruitment fees for employment
- Failing to pay contractually agreed return transportation costs for certain employees who have finished employment outside their home country
- Providing or arranging housing that fails to meet the host country’s housing and safety standards
- Failing to provide engagement letter or signed contract before engaging personnel

Anti-Sexual Exploitation and Abuse

GFEMS is opposed to all forms of sexual exploitation and abuse and is committed to mitigating the risk of exploitation or abuse of persons connected with its operations, initiatives, and activities by its employees, interns, volunteers, independent contractors, recipients, and subrecipients alike. GFEMS commits to minimum standards outlined in its Safeguarding Policy to ensure the health, safety, and welfare of the people in the communities we seek to serve. These standards apply to the groups listed above regardless whether they are on or off the clock. Any violation of these standards is a serious concern and will result in disciplinary action. More on this topic may be found in the Fund’s Safeguarding Policy.

PRACTICAL APPLICATION

Q A subrecipient reported to me that a respected research contractor hired by GFEMS has asked their staff to incorporate a series of questions into their pre and post training survey. The questions ask beneficiaries to describe details of past abuse and utilize specific scenarios for comparison. The subrecipient doesn’t feel that the questions relate specifically to the training and I am concerned that the questions could cause re-traumatization.

A You should immediately contact the contractor to convey the concern that the enumerators/interviewers have collected information that may re-traumatize respondents, is not consistent with the purpose of the research, and does not adhere to principles of data minimization. A request to detail past abuses and specific scenarios might cause harm to the participants by causing re-traumatization. This risk of emotional abuse and distress must be properly addressed before the survey can begin. Assess if there have been any negative impacts on the participants, if there is any risk of harm, and take corrective measures to ensure protection of the data and protection of participants.

Child Protection

GFEMS recognizes that all children, whatever their age, culture, disability, gender identity, gender expression, language, racial origin, religious beliefs, and/or sexual identity, have the right to protection from abuse as well as other protections and rights afforded children under the U.N. and ILO conventions on the rights of the child. GFEMS has adopted the U.N. InterAgency Standing Committee (IASC) Guidelines which define a child as any individual under the age of 18, irrespective of local country definitions of when a child reaches adulthood.

All GFEMS personnel and Board Members as well as its contractors and recipients or subrecipients have a responsibility to protect children from any kind of harm, regardless of whether they are direct participants in the Fund’s programming. Additional guidelines are found in the Fund’s Safeguarding Policy and Ethical Storytelling and Photography Guidelines.

PRACTICAL APPLICATION

Q I was sent a link to a media campaign run in India to prevent commercial sexual exploitation. The article shows a video of the interview of a child survivor and an article which discloses enough details to identify her. The project team confirmed that the girl is easily identifiable by the members of the community. However, the team shares that they received approval from the girl’s family to do the interview because they do not want other girls to make the same bad choices as their daughter. Is this OK?

A No. GFEMS has strict child protection guidelines that prohibit the Fund and its subrecipients from publishing enough information to identify or make contact with a child. The Fund also strongly discourages showing the faces of survivors of trafficking. Additionally, the team may be wrongly placing blame on the victim by suggesting that the girl has made “bad choices” You must report this incident. The Fund and its subrecipient have an obligation to protect the child survivor and ensure her well-being.
Survivor Allyship

GFEMS is committed to centering survivor voices and ensuring meaningful inclusion of survivor input throughout the organization. We acknowledge survivors as experts in the field of modern slavery who should be consulted and compensated accordingly. GFEMS recognizes the omission and/or tokenization of survivor voices in the anti-trafficking field and commits to using our own status and influence to rectify this wherever possible.

Understanding that survivors are not a monolith, GFEMS anticipates missteps and mistakes on our journey as survivor allies. However, we commit to seeking and receiving feedback with humility, taking steps to repair harm, and channeling our learning into improvement.

GFEMS is a signatory of the Pledge to Interact Ethically with Survivors, which states:

I will treat survivors as a peer and colleague regardless of the survivors' professional status in the anti-trafficking field.
I will compensate them fairly for their input and participation and treat their input with respect and validity.
I pledge to ask survivors for their subject matter expertise. I will not ask them to speak about the worst parts of their trauma.
I pledge to ask survivors about what kinds of questions they would like to be asked when sitting on a panel or being interviewed.
I will not surprise them with unnecessary questions about their life that could be triggering and
I will stick to the agreed upon questions and format.
I pledge to respect survivors' physical and emotional boundaries. I will not assume shared physical or emotional intimacy. For example, I will ask permission to give hugs.
I pledge to listen to survivors and respect their expertise on their trauma and healing. I will not tell them how to do their healing better or question their experiences.

Ethical Storytelling

GFEMS takes seriously our responsibility to uphold the dignity of our program participants and their communities through respectful use of words and imagery. Participants can include, but are not limited to: end users, program participants, and individuals at-risk of or survivors of modern slavery.

GFEMS recognizes the importance of mitigating safety risks for beneficiaries. Improper image manipulation, misrepresentation, or mismanagement may result in particularly dangerous risks for beneficiaries.

As a part of the Fund’s commitment to do no harm, GFEMS will adhere to the standards outlined in its Ethical Photography and Storytelling Guidelines. These guidelines are designed to ensure the protection of subjects, dignity and accuracy in their portrayal, and guarantee proper consent. As representatives of GFEMS, we require the third parties we work with - contractors, subrecipients, recipients, and consultants - to do so as well.

Contact the Fund’s Communications team for more information about Ethical Storytelling or see the Fund’s Ethical Photography and Storytelling Guidelines for more on this topic.

Code of Business Ethics and Conduct
Diversity and Inclusion

GFEMS is committed to creating and maintaining a workplace environment and culture that is diverse, equitable, and inclusive. We operationalize policies, procedures, and best practices that align with this commitment and hold all GFEMS team members responsible in sustaining a community that embraces diversity and fosters inclusion. More on this topic can be found in the Fund's Employee Handbook.

Equal Employment Opportunity

GFEMS provides equal employment opportunity to all individuals regardless of their race, color, creed, religion, sex, gender identity or expression, age, sexual orientation, pregnancy, national origin, disability, veteran or military status, citizenship status, or any other characteristic protected by state, federal, or local law in the United States. Please see the Employee Handbook for more detail related to EEO.

Non-Discrimination and Preventing Harassment and Bullying

GFEMS is committed to ensuring its work is free of discrimination and harassment. In furtherance of this commitment, the Fund strictly prohibits all forms of discrimination and harassment. Specifically, GFEMS prohibits managers and employees from discriminating against or harassing co-workers as well as contractors, consultants, recipients and/or subrecipients, and others doing business with the Fund. In addition, GFEMS prohibits contractors, independent contractors, recipients and/or subrecipients, and others doing business with the Organization from discriminating against or harassing the Fund's employees.

Standard of behavior are:

- Treating people with dignity and respect
- Being mindful and conscious of culture, gender, religion, and other visible or invisible differences
- Reporting harassment, bullying, and discrimination against you or another person
- Maintaining confidentiality when complaints are made
- Prohibited harassment includes:
  - Racial or ethnic slurs, epithets, and any other offensive remarks
  - Offensive jokes, whether written, verbal, or electronic
  - Threats, intimidation, and other menacing behavior
  - Inappropriate verbal, graphic, or physical conduct
  - Sending or posting harassing messages, videos, or messages via text, instant messaging, or social media

Other harassing or discriminatory conduct based on one or more of the protected categories identified in this section of the Code

Please see the Employee Handbook for more detail related to the Fund's anti-discrimination commitment.

PRACTICAL APPLICATION

Q My colleague and I recently interviewed a candidate together for a new job. The candidate mentioned during the course of the conversation that she had young children. Later in the interview, my colleague asked the candidate how she planned to manage the responsibilities of raising a family with the significant travel burden that this role requires. Was that an acceptable question to ask? What role did I have in that moment and afterwards?

A No, this is an unacceptable question to ask of any candidate or employee. The Fund prohibits conduct which has the purpose or effect of creating an intimidating, hostile, or offensive work environment. Furthermore, we base employment decisions only on factors that reflect suitability for a role, such as relevant experience, technical knowledge, and aptitude. In the interview, you should advise the candidate that they do not need to answer the question and move on to the next topic. Afterwards, you should raise this incident with HR so they can retrain your colleague on the Fund's anti-harassment policies and how they translate to acceptable interview behaviors.
Combatting Sexual Harassment

GFEMS and the third parties we work with aim to foster work environments centered around mutual respectful conduct. Sexual harassment includes a broad spectrum of conduct, including harassment based on sex, gender, gender identity or expression, and sexual orientation - all of which are not tolerated by the Fund. Please see the Employee Handbook and Safeguarding Policy for more detail related to sexual harassment.

PRACTICAL APPLICATION

Q I supervise several people. One afternoon one of my staff told me that he feels like he has been harassed by another manager. Because he was vague about the details of the events and who did what, should I investigate the situation myself to find out more information before I report the issue?

A No. You should report the incident to HR immediately. HR will work with you to determine next steps.

Drug-free Workplace

GFEMS is committed to providing a safe, quality-oriented and productive work environment, wherever we work globally. Alcohol and drug abuse poses a threat to the health and safety of members of the GFEMS team and to the security of any GFEMS equipment and facilities. For these reasons, GFEMS is committed to the elimination of drug and alcohol abuse in the workplace.

Whenever GFEMS team members are present on GFEMS premises or are conducting the Fund’s work globally they are prohibited from:

- Using, possessing, buying, selling, manufacturing, or dispensing an illegal drug (to include possession of drug paraphernalia)
- Being under the influence of an illegal drug
- Consuming alcohol, unless as part of a GFEMS approved event; any alcohol consumed at such an event must be consumed responsibly.

Please see the Employee Handbook for more detail related to our drug-free workplace.

Global Safety and Security

GFEMS is committed to minimizing safety and security risks and ensuring personnel and Board Members are provided the information, support, and training to reduce their risk exposure while maximizing the impact of our work. It is critical that everyone traveling for GFEMS understands and manages the health, safety, and security risks taken when working in the countries and environments where GFEMS funds reach.

- Everyone has an obligation to learn and understand the context and security issues where they are located. Personnel and Board Members must adhere to all pertinent policies and plans concerning safety and security and will be accountable for their actions.
- Personnel and Board Members have the right to withdraw from or refuse to take a work assignment or travel in an area due to health, safety and security concerns.
- GFEMS has the right to suspend activities or withdraw personnel and Board Members from situations that it considers to be too dangerous.
- Effective safety and security management for GFEMS is a leadership function. Managers at each tier of the organization are responsible and accountable for ensuring that safety and security policies, standards, plans, and procedures are followed.
PART 4 COMMITMENT TO GFEMS

Communication on Behalf of GFEMS - Use of GFEMS Name, Logo, and Social Media

GFEMS encourages sharing information internally and externally for the purposes of gathering information, generating new ideas, and learning from the work of others. It also helps others learn about our work. Social media platforms provide inexpensive, informal, and timely ways to participate in an exchange of ideas and information. However, information posted on a website is available to the public and, therefore, GFEMS has established guidelines governing acceptable social media use. Additional guidelines for brand messaging and logo usage are found in the Brand Book. These guidelines should be followed on all social media posts regarding GFEMS - even posts regarding GFEMS on your personal social media accounts.

The GFEMS team is powerful brand ambassadors. We are passionate about the work we do and naturally want to share it with others. But in order to protect the Fund’s reputation, we must think carefully about how we communicate.

Do not disclose any information about GFEMS or its stakeholders that has not already been approved for external release. A good rule of thumb is to ask yourself whether the information has already been shared publicly through our official communications channels, such as our company website and social media pages. When in doubt, do not post the information. If approached by reporters, bloggers, or other influencers, only authorized personnel may speak officially on behalf of GFEMS.

Any member of the GFEMS team who receives a media inquiry should pass the information along to the Fund’s Communications team immediately. Unless authorized, do not engage with reporters, not even with a response like “no comment.” For more information on how to be an effective brand ambassador, please review our Brand Book, Social Media Guidelines, Ethical Photography and Storytelling Guidelines, or contact the GFEMS Communications team.

PRACTICAL APPLICATION

Q I have worked for GFEMS for several years and know a lot about the Fund. Recently, a Facebook friend of mine posted an article about us online, and I was quick to respond with my opinions and refute a few of the points the article made, citing my experience and knowledge of GFEMS. Speaking on behalf of the Fund is not one of my job responsibilities. Is this okay?

A No. You should not be speaking on behalf of GFEMS or divulging information online that might be sensitive or confidential. If you identify yourself online as a GFEMS employee, you should also make clear that any opinions or ideas you post are your own—not those of our company. It does not matter if your comments are positive; taking a stance on issues related to the Fund or making comments about our business should be reserved for authorized personnel. Refer this post to the GFEMS Communications team.

Use of GFEMS Property

Our stakeholders expect us to use our resources only in support of our mission. Our assets, including funds, computers, other equipment and supplies, and any office space, are to be used only for our mission. Using GFEMS-issued computing devices for personal use is generally not permitted. See the Fund’s Employee Manual for more on the Use of GFEMS property including computing devices.

Code of Business Ethics and Conduct
Responsible Data Management

GFEMS respects the rights of individuals and dignity of research participants through the entire data processing lifecycle. Data safeguarding and the principle of “do no harm” is critical to our work. The Fund works through subrecipients, third party research contractors, and consultants to collect, analyze, and share data for research purposes. This is done in an effort to better understand the prevalence of modern slavery and to develop solutions to eliminate it. We hold ourselves and the third parties we work with to high standards in handling data with integrity and protecting individuals right to make an informed decision about how and if their data is used, their right to privacy, and their right not to be put at risk.

The Fund also works with local entities to implement projects and appreciates that different contexts have varying data use laws. We expect the third parties that work with us to comply with the local laws and apprise us on aligning with contextual best practices. While the Fund is a US-based entity, it recognizes the General Data Protection Regulations in European Union (EU) law on data protection and privacy for all individual citizens of the EU and the European Economic Area as consisting of one of the strongest legislations protecting data subjects, and many of its principles are infused in the Fund’s Responsible Data Management (RDM) Guidelines. The RDM Guidelines establish the steps and protocols members of the GFEMS team should take to protect data throughout the data collection lifecycle and should be reviewed in conjunction with this Code.

Privacy and Data Protection

At the core of everything we do is rooted in our unwavering commitment to integrity. We comply with all applicable privacy policies, rules, laws, and regulations and build rigorous privacy protections into our funding agreements and, where applicable, program design.

Personal Information should be used only when needed and access to personal information should be restricted only to those who actually need it. We can transfer or share Personal Information only with approved third parties. Such sharing is subject both to our policies and procedures and to contractual obligations. We must be aware of any such obligations.

Personal Information means any information or data that can be used to identify an individual, either on its own or in combination with other information. It can include, but is not limited to, European Union Personal Data, Personally Identifiable Information, Protected Health Information, and Special Categories of Personal Data (sometimes referred to as Sensitive Personal Information).

Seek guidance and take care when working with Sensitive Personal Information or protected data. Protect this information by limiting its use, access, transmission, and storage and by ensuring the appropriate security measures, as described in the referenced guidelines, are in place to protect it at all times.

Please be prepared to speak up and ask questions if you are unsure about a situation or need to report an actual or suspected data security issue or data loss incident. For more on this topic, please consult the Fund’s Information Security Guidelines.

Confidential Information - Intellectual Property

Everyone must be careful to avoid disclosing any of the Fund’s confidential or proprietary information to unauthorized persons. GFEMS confidential and proprietary information may only be disclosed to a third party under an applicable obligation of confidentiality, such as a non-disclosure or other contractual agreement, and/or with appropriate management approval.

PRACTICAL APPLICATION

Q During the course of my work at GFEMS, I often hear from stakeholders about their plans to make their communities better. Sometimes these plans include information about issues like health, safety, migration and funding of programs that address these issues. Is it ok for me to share the information I hear from stakeholders with friends and colleagues who may be able to help?

A During your tenure with GFEMS there could be many kinds of information that you will need to keep confidential. For example, if you work in the HR area, you will need to keep certain employment information confidential. If you are in finance, there are certain pieces of financial information you will not share inside or outside of GFEMS without management approval. These kinds of confidences, like those of stakeholders, must be kept.

With your manager’s guidance, you may ask the stakeholder if he or she would like to receive information related to your friend or colleague, but you must be very careful not to fall into an ethical dilemma - about appeasing a stakeholder or maintaining confidentiality. It is probably better to keep all confidences. Keep in mind, however, that nothing in your confidentiality obligations to GFEMS precludes you from reporting problems or issues to your manager, through IntegrityCounts, or to any governmental regulator or representative. More on this topic may be found in the Employee Handbook.
Anti-Fraud and Anti-Bribery
The Fund takes a zero-tolerance approach to fraud and bribery. We are committed to this approach in our interventions, activities, and business processes.

GFEMS employs all legal and safe tactics to avoid and resist paying bribes to Public Officials, even if it results in denials, delays, inconvenience, and increased cost to our operations. The same applies to all third parties engaged by GFEMS, including contractors and recipients or subrecipients.

No one is authorized to pay a bribe or request a bribe on behalf of GFEMS or use GFEMS funds to do the same.

Individuals are not expected to resist bribery to the point of putting themselves or others at real risk of personal harm or injury. A payment under such circumstances is considered extortion rather than bribery.

See the Fund’s Anti-Fraud and Anti Bribery Policy for more on this topic.

PRACTICAL APPLICATION
Q A GFEMS contractor in Singapore was told that he could hire a consultant to acquire all the necessary permits GFEMS needs from this foreign government to register and start a new project. However, the consultant requested a $5,000 retainer and said that he would use the money to “speed up the process.” Since the GFEMS contractor does not know where the money is going, and is not the one using it, does he need to say anything to management?
A The phrase “speed up the process” should raise a red flag as it suggests that the consultant may use this money for a bribe, which is strictly prohibited by law and by this Code. Personnel are required to take steps to ensure this money is not used as a bribe and must seek the advice of GFEMS management before proceeding with this consultant.

Q I understand the Code provision about giving or receiving bribes. However, I heard that there is an exception to the rule for small bribes—small bribes to get things done in some of the countries where we work, and these small bribes are not illegal. If I really need to get something done, is it ok to pay a small bribe?
A The short and direct answer is no. GFEMS does not allow for the payment of bribes under any circumstance. Even if there might be an exception under U.S. law, there is no exception under local laws. Bribes are against the law. The Code requires you to comply with all the laws in the countries in which GFEMS operates and precludes the payment of bribes under any circumstances.
Conflicts of Interest

A conflict of interest exists where an employee, intern, contractor, or Board Member has an interest, relationship, or friendship which could, or could be perceived to, interfere with their ability to decide an issue in the Fund’s best interest.

The existence or discovery of a conflict of interest does not constitute a breach of policy as long as it is disclosed and mitigated as soon as possible.

In accordance with the Fund’s Conflict of Interest Policy and Procedures, all actual or potential conflicts of interest are to be declared, these declared conflicts are subsequently managed to mitigate the associated risks, and decisions and actions are documented to ensure transparency and accountability. See the GFEMS Conflict of Interest Policy and Procedures for more on this topic.

PRACTICAL APPLICATION

Q What if a conflict of interest actually helps GFEMS?
A Even when a conflict of interest might help GFEMS, the right thing to do is to disclose the conflict and to recuse yourself from any decision making related to the conflict. And of course document the conflict using the Fund’s standard record-keeping procedures.

Q I believe I might have a personal conflict of interest with a GFEMS business activity. Is it ok for me to remain engaged since I think I can be objective?
A The Conflict of Interest Policy requires personnel notify their managers or HR immediately when they become aware of a potential conflict of interest. GFEMS will review the matter and determine whether recusal is necessary.

Q I work in an account’s payable capacity at GFEMS. My son just landed a great job with a consulting firm supporting the Fund. Since my son is now our account rep, is it ok for me to expedite the payments?
A No. You must treat all vendors, consultants, contractors, or other partners equally and fairly. The Code restricts members of the GFEMS team from giving or accepting business favors. In addition, you have a potential conflict of interest because your son is the account rep for a contractor who does business with GFEMS. This situation should be disclosed to your manager or to HR immediately.

Hiring Family or Persons Known To You

GFEMS does not prohibit employment or engagement of family members or personal relations so long as that individual is not a direct report. Safeguards will be established by the Fund to ensure that such employment or engagement does not result in a conflict of interest.

See the Employee Handbook for more on the Employment of Relatives and Domestic Partners.

Code of Business Ethics and Conduct
Gifts, Gratuities, and Business Courtesies

Gifts and entertainment should never be used or allowed to influence business decisions. When offers of gifts and entertainment are made or accepted in situations where they are not appropriate, they can look like, or may in fact be, bribes. Gifts can expose us to accusations of unfairness, unlawfulness, and risk our reputation among our stakeholders.

We should be able to accept and make offers of gifts and entertainment ONLY when they:

■ are proportionate in the context; and
■ do not create any sense of expectation or obligation on the recipient or the giver.

Organizations like GFEMS that receive government funding are also subject to strict rules regarding gifts to government officials. In order to ensure compliance with these rules, members of the GFEMS team may not offer any business courtesies (like food, drink, entertainment, etc) to any government employees. If a government employee requests any kind of business courtesy, respectfully decline, explain that GFEMS policy prohibits them from offering or providing gifts to government officials, and immediately report any such request to the Associate Director for Compliance and Operational Integrity.

More on this topic may be found in the Fund's Anti-Fraud and Anti Bribery Policy as well as the GFEMS Gifts and Meals Guidelines.

PRACTICAL APPLICATION

Q What if a GFEMS employee, recipient or a contractor is wearing GFEMS apparel or other GFEMS branded accessories when participating in a political activity?
A Wearing GFEMS apparel or any other GFEMS branded accessory could be perceived as GFEMS is supporting that political event or a political party. Members of the GFEMS team should not wear branded apparel or accessories when participating in politicized events in their personal capacity. If you are unsure, consult appropriate GFEMS staff before participating in a political activity.

Political Activities - Participation in Elections

GFEMS does not fund political contributions, in cash or in kind, anywhere in the world. This prohibition includes support of political activity, political parties or their representatives, political campaigns, and candidates or any of their affiliated organizations.

Members of the GFEMS team have the right to engage as an individual in the political process and make political donations, as long as it is not represented that GFEMS is making the contribution and provided there is no conflict of interest involved. Any questions or concerns about political activities may be directed to your manager, the Associate Director for Compliance and Operational Integrity, or Senior Director of Finance and Operations.

PRACTICAL APPLICATION

Q A recipient or contractor we work with sent me a holiday gift basket. Can I keep it?
A Accepting a gift from a recipient or contractor could be seen as showing favoritism or worse, a bribe for future funding or work. During holidays and other celebratory occasions it may be appropriate to accept a gift on behalf of the organization. If a recipient of GFEMS funding or a contractor who provides us with services offers you a gift, you should let your manager know and try to share it with the GFEMS team. If you are unsure what to do with a gift you have personally received on behalf of a GFEMS recipient or contractor, please contact HR.

Code of Business Ethics and Conduct
**Procurement Integrity**

We often submit proposals for funding from various stakeholders. We compete honestly. Competing honestly means we do not over promise; we budget realistically; we do not use donor source selection information or confidential competitor information improperly, and we do not collude with competitors or other third parties. We will not engage in agreements or conduct that unlawfully prevent or restrict competition. We are proud to compete on the merits of our abilities alone.

In order to meet our mission, we must engage employees, consultants, contractors, recipients, and subrecipients based on objective criteria. Our goal is to hire the most qualified candidates and do business with the best partners and resources, based on ethical hiring and procurement practices that both promote transparency and integrity and comply with applicable laws and regulations. Fair and transparent competition is the basis for the ethical hiring of employees and selection of partners. Consult the Fund’s Subaward Management Guidelines, Employee Handbook, and Procurement Policy for more on this topic.

**PRACTICAL APPLICATION**

**Q** GFEMS has used the same contractor for years now, so why is F&O asking me to recompete? I’ve already told them that the quality of the work is superior and we’re getting a great deal. Plus, I don’t have time to conduct competition; we need to get this contract signed yesterday!

**A** GFEMS personnel are accountable to taxpayers and other stakeholders who contribute to the Fund. We all must be able to demonstrate to those stakeholders that we are good fiscal stewards of the funds entrusted to us. If you haven’t checked prices with other contractors, how do you really know that you are still getting the best value? Personnel are expected to follow the Fund’s policies and procedures. Reliable internal controls are critical for proper, complete, and accurate accounting and financial reporting. Each of us must follow the procurement policies and procedures related to those controls. In the rare circumstance that there is only a single or sole provider of a good or service, you should carefully follow the Fund’s procedures for sole sourcing.

**Financial Integrity**

We maintain effective controls over financial reporting to ensure a complete and accurate record of our financial transactions. Proper oversight and accountability of GFEMS assets helps us meet our financial, legal and regulatory obligations, ensuring that we remain a trusted partner and maintain the trust of our stakeholders.

The Donation and Gift Acceptance Policy, Investment Policy, Finance Manual, Subaward Manual, and Procurement Policy and Procedures provide more information on this topic. These policies should be read in conjunction with this Code and other related GFEMS policies like the Anti-fraud and Anti-bribery Policy.

**PRACTICAL APPLICATION**

**Q** I travel a lot for GFEMS and work hard to get all my expenses reconciled and reported on time. It can get confusing because sometimes a host will pay for my travel, and sometimes I bill it to my personal credit card for reimbursement later. In reviewing my latest personal credit card, I noticed a $200 credit from a hotel I stayed at during a conference where I was invited to give a presentation. When I checked out, the hotel charged me for the room, so I paid the expense and got reimbursed by GFEMS. I am guessing that the sponsoring agency discovered that the room was charged to their master account and had the hotel credit my card. Since my travel was already reconciled and there are many times my GFEMS reimbursements don’t cover my actual travel costs, can I just keep the credit? After all, who will know?

**A** The definition of honesty is doing the right thing even when no one is watching. The fact that probably no one will notice this overpayment does not remove your responsibility to do the right thing. You should reimburse GFEMS the amount of the overpayment of the refund.
PART 6 COMMITMENT TO OPERATIONAL INTEGRITY

Anti-terrorist Financing

Individuals, companies, and organizations are sometimes subject to restrictions from various governments. Members of the GFEMS team play an important role in ensuring the eligibility and responsibility of contractors, consultants, recipients, or subrecipients. To qualify as responsible, an individual or organization must have the technical capacity, experience, and ability to implement projects on behalf of or with GFEMS. It must further have adequate accounting and operational controls; a satisfactory record of performance, integrity, and business ethics; and must be otherwise qualified and eligible to receive GFEMS funds. Part of the eligibility determination may include vetting information against established Government and International Organization databases. It is our responsibility to comply with these requirements to prevent engagement with terrorists, criminals, and other prohibited entities or individuals. The Subaward Manual and Procurement Policy and Procedures provide more information on our vetting and excluded party’s verification process.

Records Management

We are responsible for ensuring that the Fund’s records are prepared accurately and honestly. Records must be supported by enough documentation to provide a complete, accurate, valid, and auditable trace of each transaction. This includes documentation regarding contracts, purchases, expenses, and all activities related to fulfilling our mission. Fair and accurate records are essential for managing our activities and maintaining the accuracy and integrity of the Fund’s financial reporting and disclosure. Do not alter documents to conceal, exaggerate, or falsify information; approve payments only if they are for an authorized purpose and supported by adequate documentation; and never destroy documents in a manner that violates the Fund’s document retention policy.

All GFEMS records must accurately and fairly reflect our transactions in sufficient detail and in accordance with our established policies, procedures and practices. Some employees have special responsibilities in this area, but all of us contribute to the process of recording operational results or maintaining records.

Our reporting and record keeping should accurately reflect our activities and always be aligned with our accounting and record-keeping processes and the law. GFEMS will not tolerate dishonesty, including false record keeping. Members of the GFEMS team should come forward with any concerns pertaining to questionable accounting, financial reporting, timekeeping, expense reporting, or auditing matters. If anyone, including a manager, instructs you to make an inaccurate record or report, you should speak up immediately and communicate your concerns to the Senior Director of Finance and Operations or any of the various reporting options in this Code. The Finance Manual, Subaward Manual, and Procurement Policy and Procedures provide more information on records management.

PRACTICAL APPLICATION

Q: I am working on a project that requires us to report monthly on our progress. We are running a little behind. My manager tells me that by the time anyone reads the report we will be all caught up, so we might as well report that we are on schedule. I don’t know what to do.

A: Actually, you do know what to do; otherwise, you wouldn’t be troubled by the situation. Your own internal compass and the Code tell you to record the project’s performance accurately. Hopefully your manager will agree with your approach. If not, you will need to report the situation using the Fund’s standard reporting mechanisms. Remember, you are doing the right thing, you are respecting our stakeholders, you are obeying the law, and you are demonstrating our Values.
Anyone who violates GFEMS Code or any Policies and Procedures, regardless of position or tenure, may be subject to disciplinary action, up to and including termination.

The disciplinary action will vary depending on the seriousness of the offense, whether there is a history of prior conduct, the certancy of the facts, and other factors. Disciplinary action, if taken, could include requirements for additional training, verbal or written warnings, and, ultimately, termination.

In addition, violations of laws or regulations can trigger legal action against you, your colleagues, GFEMS, or its stakeholders (including contractors, recipients, and subrecipients) that could result in fines, suspension of activities, debarment, and imprisonment.

Personnel will be asked to sign a statement certifying that they understand and will abide by this Code. Each person will sign the Acknowledgement Statement when they begin work for GFEMS and upon any subsequent change to the Code, or at a frequency established by GFEMS.
Code of Business Ethics and Conduct