

INTERNATIONAL MEDICAL CORPS CODE OF CONDUCT AND ETHICS

WHO WE ARE

HOW WE WORK

WHAT WE STAND FOR

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Message from the President & CEO

We at International Medical Corps are part of a global, humanitarian team dedicated to saving lives and relieving the suffering of those impacted by war, natural disaster and disease by delivering vital health care services that focus on training. Our approach of helping people to help themselves has proved to be critical in returning devastated populations to self-reliance and long-term sustainability.

Our mission at International Medical Corps is to help others, and we can all be proud of that. However, it is also critically important that we go about doing our work in a way that is ethical and in compliance with applicable laws and regulations. We do and *must* respect the people and communities we serve, local law, U.S. and UK law, and any other laws that apply. But our goal is not just to comply with applicable laws; we also strive to abide by the highest standards of business ethics. We operate with integrity, responsibility and accountability.

We set forth in these pages International Medical Corps' Code of Conduct and Ethics. The Code serves to reinforce and enhance International Medical Corps' commitment to an ethical way of doing business. The policies set forth here are part of International Medical Corps' long-standing tradition of high ethical standards.

All employees, volunteers, interns, officers and directors are expected to comply with the policies set forth in this Code. You should read the Code carefully, and periodically review it. If you have any questions, speak to your Country Manager, the Human Resources Department located at Headquarters or any of the other resources identified in this Code.

Thank you for all you do every day to contribute to International Medical Corps and the people and communities we serve – and thank you for adhering to International Medical Corps policies and values in your work.

Sincerely,

Nancy Aossey

About the Code of Conduct and Ethics

The Code of Conduct and Ethics is applicable to all employees, volunteers, interns, consultants, officers and directors of International Medical Corps. Our work depends on the reputation of all of us for integrity and principled business conduct.

The Code cannot cover every applicable law and policy or provide answers to all questions that might arise. It will, however, help guide your conduct, and help you know where to turn with questions and concerns.

Responsibilities

Each of us is responsible for knowing and abiding by the standards contained in the Code. If you have questions, ask. International Medical Corps has a number of resources in place to answer your questions and guide you through difficult situations – including your Country Director, the Human Resources Department located at Headquarters and the Legal Department.

Copies of this Code are available on OneCorps or from the Human Resources Department at Headquarters. A statement acknowledging receipt of the Code of Conduct and Ethics must be signed by all staff.

Reporting Violations and Seeking Guidance

If you know of or suspect a violation of applicable laws or regulations, this Code or other International Medical Corps' policies, immediately report that information to your Country Director, the Human Resources Department located at Headquarters or the International Medical Corps Reporting Hotline. ***International Medical Corps absolutely prohibits retaliation against employees because of a good faith report of suspected misconduct.***

If you have questions about this Code or any International Medical Corps policies or if you are unsure about the best course of action in a particular situation, contact your Country Director, the Human Resources Department located at Headquarters or the International Medical Corps Reporting Hotline.

The Reporting Hotline

International Medical Corps has a 24-hour Reporting Hotline, which you can use to report violations of this Code of Conduct or other International Medical Corps' policies or to seek guidance on those policies. You may report suspected violations to or ask questions through the Hotline anonymously. The Hotline can be reached from anywhere:

- Via phone: Call your respective country hotline at the number listed at www.internationalmedicalcorps.ethicspoint.com
- Via Internet: Go to www.internationalmedicalcorps.ethicspoint.com > “File a new report”

Investigations of Suspected Violations

All reported violations will be appropriately investigated and treated confidentially to the extent reasonably possible. International Medical Corps reserves the right to determine how, and to what extent, each investigation is conducted. You have a duty to communicate honestly and cooperate

fully in International Medical Corps investigations and audits. It is also important that you *do not attempt* to conduct your own preliminary investigations. Investigations often involve complex legal issues, and acting on your own may compromise the integrity of an investigation and harm International Medical Corps.

Violations

Subject to applicable law, employees who violate this Code, other International Medical Corps policies or the law may be subject to disciplinary action, up to and including termination.

Responsibilities of supervisors

Those who supervise others have additional responsibilities under the Code. They should:

- Set an example of ethical behavior through their own conduct and their oversight of the work of others.
- Ensure that those who report to them have sufficient knowledge and resources to follow the Code's standards.
- Monitor compliance of the people they supervise.
- Enforce this Code and International Medical Corps policies consistently and fairly.
- Support employees who in good faith raise questions or concerns.

Employees often go to their supervisors to report suspected misconduct, and it is important that they feel comfortable doing so. If you supervise others, make yourself available to hear employee concerns and respond appropriately. If an employee reports a suspected violation to you, promptly contact the Human Resources Department located at Headquarters so that the matter can be investigated. International Medical Corps' strict non-retaliation policy is critically important. As a supervisor, you have a responsibility to ensure that retaliation does not occur, which may require that you monitor applicable situations.

No Bribery

Giving bribes, kickbacks or other improper payments (of cash or of any non-cash thing or favor of value) to government officials, civil servants or anyone else to influence them in the conduct of their jobs is illegal and is prohibited by International Medical Corps policy. This includes direct payments or payments made indirectly through an agent or other intermediary. For additional information, see the Anti-Bribery Policy.

Dealing with Government Officials

As a humanitarian, non-profit organization, International Medical Corps does not make payments or contributions to any political party, candidate for government office or campaign. In addition, we must be careful not to engage in lobbying activities without appropriate guidance and approval. Before you meet or communicate with government employees or officials in order to influence legislation or other government rule-making, contact the Legal Department at Headquarters for guidance.

Compliance with Donor Requirements

We are committed to satisfying the obligations that we undertake on behalf of our donors. When working on a project, you must understand the relevant donor requirements. You must know what costs are allowable and appropriate for any given project and abide by all applicable donor rules and International Medical Corps procedures, including properly completing and maintaining time sheets.

Conflicts of Interest

A conflict of interest occurs when your personal interests or loyalties interfere with the interests of International Medical Corps. A conflict situation can make it difficult for you to perform your work for International Medical Corps objectively. And, even if you are certain that your judgment will not in any way be affected by an outside interest, if others might reasonably think the interest is substantial, the appearance of a conflict exists. Conflicts can include situations where, for example, you own an interest in or have an employment or consulting relationship with an organization that does business with International Medical Corps, such as a supplier. Conflicts also occur when your spouse or domestic partner, your children, parents, brothers, sisters, in-laws, or someone else with whom you have a close family relationship either is a competitor, supplier or partner of International Medical Corps or is employed by one. As an employee, director or officer of International Medical Corps, you must ethically disclose any actual or apparent conflicts between your personal interests and International Medical Corps to your Country Director or Headquarters supervisor, as applicable, and to the Human Resources Department located at Headquarters. For additional information, see the Conflicts of Interest Policy.

Gifts and Entertainment

Accepting Gifts and Entertainment

When you are involved in making business decisions on behalf of International Medical Corps, your decisions must be based on objective, unbiased judgment. Accepting gifts or other benefits from suppliers or other business partners can impact our business judgment. For this reason, gifts, meals and entertainment are permissible only if they are customary and commonly accepted business courtesies, are only nominal in value, and are given and accepted without an express or implied understanding that you are in any way obligated by your acceptance of the gift. Gifts of cash are prohibited and must be returned.

Offering Gifts and Entertainment

As a non-profit, humanitarian organization, International Medical Corps strongly discourages employees from offering gifts or entertainment to others. In those unusual situations when you are providing a gift or business courtesy in connection with International Medical Corps business, you must not offer or furnish any gift that is of more than nominal value.

There are strict laws that govern providing gifts, meals or other things of value to government officials. Do not provide anything of value to government officials or employees or members of their families in connection with International Medical Corps business without prior written approval from the Legal Department.

Treating Each Other Fairly and Respectfully

We are a global organization, and our workforce includes talented professionals from a wide range of cultures and backgrounds. International Medical Corps is an equal opportunity employer. Employment decisions – such as hiring, promotion, pay and termination – should be made on the basis of qualifications, experience, ability and performance, and never because of a person’s race, color, religion, sex, sexual orientation, age, disability, marital status, national origin, military status, gender identity, pregnancy, genetic characteristic or any other characteristic protected by applicable law.

International Medical Corps promotes a work environment that is free from harassment and discrimination. We will not tolerate inappropriate conduct that interferes with job performance, diminishes the dignity of any person, or creates an intimidating, hostile or offensive work environment. This includes harassment of employees or others based on race, gender, age, sexual orientation or any other protected class under applicable law. If you believe that you have been subjected to harassment or discrimination of any kind, promptly report the incident to your Country Director and to the Human Resources Department located at Headquarters. For additional information, see the Equal Employment Opportunity Policy and the Policy Against Harassment.

Safety and Security

Because our work often takes us to difficult parts of the world, the safety and security of our employees must be our top priority. You are never expected or encouraged to jeopardize your personal safety or that of any colleague, partner or beneficiary. In addition, possession of firearms or other weapons is prohibited. International Medical Corps has safety and security policies and protocols that are designed to keep us safe, as well as training on this topic. Take it seriously and comply with International Medical Corps policies in this area. For additional information, see the Policies on Safety and Security.

Sexual Exploitation and Abuse

Sexual exploitation and abuse by International Medical Corps staff is absolutely prohibited. Sexual activity with a person under age 18 is prohibited regardless of the age of consent locally. Employees are also prohibited from having sexual relationships with beneficiaries, as these relationships are often based on unequal power dynamics and may undermine the credibility and integrity of our humanitarian work. You must report any suspicions of sexual exploitation or abuse, whether committed by a staff member of International Medical Corps or of another organization. See the Policy against Sexual Exploitation and Abuse.

Alcohol and Drug Free Workplace

International Medical Corps is committed to maintaining a safe and healthy work environment free from the influence of alcohol and drugs. You are expected to report to work free from the influence of alcohol or non-prescription drugs.

Protection and Proper Use of International Medical Corps Assets

We each have a duty to protect International Medical Corps’ assets and ensure their efficient use. Theft, carelessness and waste have a direct impact on the services we are able to provide to beneficiaries. Except as specifically authorized, International Medical Corps assets, including

equipment, materials, resources, proprietary information and staff time, must be used for business purposes only. For further information, see the Fraud Policy.

Accurate Books and Records

International Medical Corps' work is funded by government agencies and private donors, all of whom require International Medical Corps to make and keep accurate books and records. You must complete all International Medical Corps documents accurately, truthfully, and in a timely manner, including documents related to hours worked and all travel and expense reports.

You must record International Medical Corps' financial activities in compliance with International Medical Corps policy and accounting practices. Never create a false or misleading report or record, or make a payment or establish an account on behalf of International Medical Corps with the understanding that any part of the payment or account is to be used for a purpose other than as described by the supporting documents. For further information, see the Fraud Policy.

Records Maintenance

International Medical Corps creates and receives large numbers of records. Our contracts and applicable laws require that we retain various records for certain periods of time. We must comply with the law and International Medical Corps policy regarding the maintenance of International Medical Corps records.

Confidential Information and Privacy

Sensitive information such as employee and beneficiary information and information about International Medical Corps' donors or contracts are examples of confidential information. You must maintain the confidentiality of information entrusted to you by International Medical Corps and its beneficiaries and other business partners. We also comply with the many data privacy laws around the world. We depend on you to help respect privacy by only accessing confidential employee data with proper approvals and on a need-to-know basis and not repeating or discussing information with anyone who is not approved to know such information. For further information, see the Confidential and Proprietary Matters Policy.

Your obligation to treat information as confidential does not end when you leave International Medical Corps. Upon the termination of your employment or other engagement with International Medical Corps, you must return everything that belongs to International Medical Corps, including all documents and other materials containing International Medical Corps and beneficiary confidential information.

Trade Restrictions and Anti-Terrorism Laws

International Medical Corps is a global organization, and our people, supplies and information move across national borders every day. There are numerous laws that govern how we and our goods enter and leave different countries. Exporting goods and technology from the U.S. and other countries may require an export authorization, and importing goods can also require licenses. In addition, the U.S. and many other governments maintain lists of countries and individuals with which companies, including NGOs, may not do business and impose other types of trade restrictions. International Medical Corps complies with all applicable trade restrictions and anti-

terrorism laws. For additional information, see the Anti-Terrorism Policy and the Export Compliance Policy.

Images, Logos and other Intellectual Property

At International Medical Corps, we protect our own intellectual property and respect the intellectual property rights of others, including copyrights (such as copyrights in photos, videos and other works), trademarks (including the International Medical Corps name and logo and the logos of other businesses), and computer software licenses.

Computer and Communication Resources

We must secure our computers and all International Medical Corps computer and communication resources. In addition, when you are using International Medical Corps resources to send e-mail, voicemail or to access Internet services, you are acting as a representative of International Medical Corps. Improper use of these resources reflects poorly on International Medical Corps and exposes us to liability. International Medical Corps' computer and communication resources are the property of International Medical Corps and are intended for use by staff to conduct International Medical Corps business. To the extent permitted by applicable law, International Medical Corps reserves the right to monitor these resources.

Social Media Guidelines

International Medical Corps has established guidelines to assist employees in understanding their responsibilities for using social media. Social media includes all means of communicating or posting information or content of any sort on the Internet, including but not limited to your own, or someone else's blog, journal or diary, personal web site or newsletter, social networking or affinity web site, web bulletin or a chat room, video or wiki postings, sites such as Facebook and Twitter, chat rooms, whether or not associated or affiliated with International Medical Corps. International Medical Corps respects the right of its employees to use social media as a means of self-expression; however, we ask that you observe the following guidelines when posting:

- If you choose to identify yourself as an International Medical Corps employee, please understand that some readers may view you as a spokesperson for International Medical Corps. Inform your readers that the views you express are yours alone and do not necessarily reflect the views of International Medical Corps.
- Make sure that the information you are posting is true.
- Do not post or disclose International Medical Corps' confidential or proprietary information, including but not limited to program and financial information, or company-issued documents, as set forth in the Confidential Nature of International Medical Corps Affairs policy.
- Do not post, unless authorized in writing by International Medical Corps, the following information:
 - photographs of beneficiaries, unless you have explained to them that their image might be disseminated locally and globally, and have obtained their permission (if a minor, permission from their parent/guardian)
 - the trademarks or logo of International Medical Corps
 - any copyrighted works of International Medical Corps.
- Be respectful to International Medical Corps, our employees, beneficiaries, partners, and affiliates.
- Ensure that your online conduct does not violate International Medical Corps' discrimination and harassment prevention policies.

Remember

Ultimate responsibility to ensure that International Medical Corps complies with the many laws, regulations and ethical standards affecting our work rests with each of us. International Medical Corps depends on you to conduct our work ethically so that we can continue helping people and doing the important work that we do.

No Rights Created

The Code of Conduct and Ethics is a statement of policies for individual and business conduct and does not, in any way, constitute an employment contract or an assurance of continued employment. The Code is not intended to and does not create any obligations to or rights in any employee, volunteer, client, supplier, competitor, donor or any other person or entity.