



CODE OF BUSINESS ETHICS AND CONDUCT

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Policy Owner: Chief Ethics and Compliance Officer

Table of Contents

- MESSAGE FROM CEO AND PRESIDENT.....III
- MESSAGE FROM CHIEF COMPLIANCE OFFICER..... IV
- I. BLUMONT’S MISSION, VISION, AND VALUES1
- II. BLUMONT’S CODE OF BUSINESS ETHICS AND CONDUCT 2
 - 2.1 DO WHAT IS RIGHT – ACT ETHICALLY EVERY DAY2
 - 2.1.1 Report Problems – Speak Up Early2
 - 2.1.2 Report misconduct, fraud, waste, and abuse3
 - 2.1.3 Blumont will not retaliate against you for reporting.....3
 - 2.2 RESPECT OTHERS – REMEMBER WHY WE ARE HERE AND WHO WE SERVE4
 - 2.2.1 Do a good job – Give our donors and beneficiaries your best.....4
 - 2.2.2 Treat others as you wish to be treated – Non-discrimination is our Golden Rule.....4
 - 2.2.3 Communicate openly, honestly, effectively, and in a timely manner.....4
 - 2.2.4 Protect those in need and do not turn a blind eye – Prohibition against child abuse, trafficking in persons, and sexual exploitation.....5
 - 2.3 WORK RESPONSIBLY.....6
 - 2.3.1 We always promote ethics and compliance.....6
 - 2.3.2 Managers have a special role in promoting respect and a healthy ethical culture.....6
 - 2.3.3 We treat candidates, vendors, and suppliers fairly6
 - 2.3.4 We compete honestly7
 - 2.3.5 We avoid unethical business practices and conflicts of interest7
 - 2.3.6 We do not offer or take bribes or kickbacks.....8
 - 2.3.7 We do not give or accept gifts as representatives of Blumont8
 - 2.3.8 We keep accurate records.....9
 - 2.3.9 We cooperate with officials and auditors10
 - 2.3.10 We abide by restrictions on lobbying, political activities, and charitable donations10
 - 2.3.11 We protect the environment10
 - 2.3.12 We work safely.....10
 - 2.3.13 We obey the law11
 - 2.4 PROTECT OUR REPUTATION, INFORMATION AND ASSETS11
 - 2.4.1 Protect our reputation11
 - 2.4.2 Do not share confidential information.....11
 - 2.4.3 Treat intellectual property with care11
 - 2.4.4 Only use Blumont assets to support Blumont’s Mission.....12
- III. IMPLEMENTATION13
 - 3.1 COMPLIANCE WITH THE CODE.....13
 - 3.1.1 Comply with our Code.....13
 - 3.1.2 Report suspected violations of our Code.....13
 - 3.1.3 Non-Retaliation14
 - 3.2 CONSEQUENCES FOR FAILURE TO COMPLY.....14
- IV. TRAINING, REINFORCEMENT AND ACKNOWLEDGEMENT.....15
 - 4.1 TRAINING.....15
 - 4.2 REINFORCEMENT.....15
 - 4.3 ACKNOWLEDGEMENT16
- V. CODE OF CONDUCT SUMMARY:.....17
- APPENDIX18
 - 5.1 FREQUENTLY ASKED QUESTIONS18
- VI. ACKNOWLEDGEMENT AND PLEDGE 22

MESSAGE FROM THE CEO AND PRESIDENT

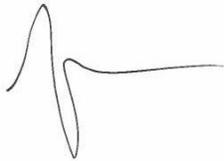
Every day, Blumont teams are working around the world to provide lifesaving humanitarian assistance, help people recover from crises, and establish the foundational systems and services strong communities are built on. In post-conflict areas, challenging situations, and emerging economies, Blumont staff are committed to the shared belief that what we do helps make peoples' lives better.

We work hard to achieve results for our beneficiaries in an efficient and effective way because our donors and clients rely on us—and because it is the right thing to do.

While each country and community we work in has unique opportunities, challenges, and needs, what doesn't change is how we approach our work—with respect, integrity, and a sense of accountability to our beneficiaries, donors, clients, partners, and colleagues. We also take pride in the diversity of our team, celebrating what different experience and perspectives bring to our work, and recognizing that we're stronger for it.

Blumont's Code of Business Ethics and Conduct outlines the expectations and standards that we hold ourselves to. I strongly believe that our team should know and live this approach because not only does our work matter, but *how* we work together matters too.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jonathan Nash', with a long horizontal line extending to the right.

Jonathan Nash
President and CEO

MESSAGE FROM CHIEF COMPLIANCE OFFICER

Our Code of Business Ethics and Conduct (“Code of Conduct”) lays the groundwork for our behavior at Blumont and the manner in which we approach our work.

Blumont’s Code of Conduct is a summary of the principles and standards of business conduct expected of all employees wherever we operate, providing us with practical guidance on how to deal with important ethical issues. We follow both the letter and the spirit of the laws and regulations that govern our business. As such, the Code sets the standard that every employee is expected to meet. It is also intended to provide general guidance on situations that may arise in our day-to-day activities on behalf of Blumont. We also recognize, however, that there may be situations where, even after consulting the Code, the appropriate course of action is not clear. In such cases, please contact the resources listed below for guidance.

We are providing training on the Code to further your understanding of its importance, our obligations to donors and customers, and Blumont’s requirements regarding workplace behavior. The training is designed to ensure that you understand Blumont’s expectations, your responsibilities, and how the code may apply and be interpreted under differing circumstances. Your participation in Blumont training programs is also required, and will be a factor in your annual performance reviews, so please ensure that you attend the training and complete the lessons in a timely manner. Your responsibilities are simple: comply with the Code, ask questions when unsure, and report suspected violations.

Thank you for your commitment to business integrity and ethical conduct.

Sincerely,



Lauren Camilli,
Vice President & Chief Compliance Officer

Hotline E-mail: hotline@blumont.org Phone: 703-957-1500 Online: blumonthotline.com	Jonathan Nash Blumont President and CEO E-mail: jnash@blumont.org
Lauren Camilli Vice President, Chief Ethics and Compliance Officer E-mail: lcamilli@blumont.org Phone: 703-778-4267	

I. Blumont's Mission, Vision, and Values

Blumont's Mission is to deliver innovative, evidence-based, locally driven solutions that advance the aspirations of people, communities and donor partners worldwide.

Blumont's Vision is to collaborate, innovate and transform by listening and engaging with local communities, applying technical capabilities to creatively meet unique challenges and rigorously measuring and analyzing the results of our work to continuously improve our approach.

Blumont's Values are integrity and stewardship, and they embody our commitment to transparency and accountability as a relief and development partner, a steward of public resources and as individual team members of Blumont:

1.1 INTEGRITY

- Perform as a mission-driven organization committed to evidence-based decision-making.
- Maintain a culture of transparency, accountability, and compliance.
- Ensure high standards for financial and accounting practices and controls.
- Establish and maintain a workplace built on mutual respect, collaboration, and commitment.

1.2 STEWARDSHIP

- Maximize performance for beneficiaries, donors and the public, as measured by results.
- Operate high-quality programs that deliver on what we promise at the lowest cost possible.

Our Vision and Values underlie our Mission of delivering innovative, evidence-based, locally driven solutions that advance the aspirations of people, communities and donor partners worldwide.

As a member of the Blumont team, you must be committed to our Vision, Values, and Mission. To help you understand how to personify these core values in your job every day, we are providing this Code of Business Ethics and Conduct (the "Code") to act as a guide on what is expected of you and what you might encounter as a member of the Blumont team.

Any conduct not consistent with our Code demeans our Mission, reduces donor confidence in our ability to perform, and disrespects our beneficiaries. If you are faced with a difficult decision or confronted with a situation that makes you uncomfortable or unsure about what direction to take, start with this Code. Use common sense and your best judgment. If you are still unsure about what to do, ask your manager. If for some reason you are not comfortable asking your manager, seek help from any senior leader of Blumont, including the President/CEO, or any member of the Board of Directors.

Our Vision, Values, and Mission statements are principles we share together. As a member of the Blumont team—whether Board member, employee (anywhere in the world), or partner (consultant, subcontractor, sub-recipient, or supplier)—you agree to uphold Blumont's Mission, and our Code.

II. Blumont's Code of Business Ethics and Conduct

As a team member, you may ask, how do I uphold Blumont's Vision and Values in meeting our Mission? The following five principles provide direction for the conduct of your work at Blumont.

- Do What is Right – Act Ethically Every Day.
- Report Problems – Speak Up Early.
- Respect Others – Remember Why We Are Here and Who We Serve.
- Work Responsibly.
- Protect our Reputation, Information, and Assets.

2.1 Do What Is Right - Act Ethically Every Day

We work at Blumont because we believe in its mission of delivering innovative, evidence-based, locally driven solutions that advance the aspirations of people, communities and donor partners worldwide; because our work embodies our individual drive to do what is right in the world; and because we want to empower individuals around the globe.

We work at Blumont because our internal compass leads us to do what is right, and that compass guides us to follow the highest ethical standards in all of our operations and interactions. But we must always remember: the manner in which we approach our work is just as important as the outcomes we seek to achieve.

If you are confronted with a situation that causes you concern, ask yourself:

- Would you be proud to tell your spouse, your parents, or your children?
- Would you want your supervisor or colleagues to know?
- Would you want the Chief Ethics and Compliance Officer or General Counsel to know?
- How would you feel if your actions were published in the newspaper, broadcast on the radio, or posted on the internet?
- How would you explain your actions to an auditor, investigator, or to law enforcement?
- How might Blumont's or your own reputation be impacted?

While the diversity of Blumont's staff and our geographic reach are broad, "doing what is right" is the foundation of our mission. No code of conduct can anticipate every situation you may confront in your work, but your conviction to do what is right, combined with the guidance set forth below, will serve you well in your work at Blumont.

2.1.1 Report Problems - Speak Up Early

We encourage all Blumont employees, sub-awardees, contractors, and partners to speak up, raise concerns, and report problems—including potential violations of this Code—without fear of retaliation. Early reporting of potential issues is essential; in speaking up, we maintain the strength of our ethical culture and our service to our beneficiaries. See Appendix A for frequently asked questions on reporting problems.

2.1.2 Report misconduct, fraud, waste, and abuse

What – We all must report suspected or actual misconduct, fraud, waste, abuse, serious health or safety concerns, or the violation of the law or Blumont policy, including laws and policies related to the award, accounting, and performance of donor-funded agreements.

Where – Inside Blumont, you should report by calling or emailing the Ethics Hotline, or submitting your concerns through our online reporting tool blumonthotline.com. Although we would encourage you to share your identity, there is always the opportunity for you to report anonymously if you choose to do so. Alternatively, you can report to your supervisor, the Chief Ethics and Compliance Officer, any senior manager, the General Counsel, the President/CEO, or any member of the Board of Directors. Use the contact information provided below:

Ethics Hotline

E-mail: hotline@blumont.org

Phone: 703-957-1500

Online Reporting Form: blumonthotline.com

Lauren Camilli

Chief Ethics and Compliance

E-mail: lcamilli@blumont.org

Phone: 703-778-4267

Jonathan Nash

Blumont President and CEO

E-mail: jnash@blumont.org

Whichever reporting method you choose, you must promptly report all details that you are aware of about any suspected misconduct so that Blumont can conduct a thorough investigation and take appropriate action where needed.

2.1.3 Blumont will not retaliate against you for reporting

Blumont will not tolerate retaliation against anyone who, in good faith, makes a report of any violation or suspected violation under this Code or any other Blumont policy. Any such retaliation would be considered a serious violation of this Code and result in appropriate disciplinary action. Such action may include termination of employment, and in some cases, referral to government officials, which could result in the imposition of criminal or civil liability.

Blumont is committed to protecting the rights of employees working on U.S. Federal Government funded contracts, subcontracts or grants under 41 U.S.C. § 4712, Pilot Program for Enhancement of Employee Whistleblower Protection.

Blumont complies with whistleblower protections and, in accordance, will protect employees who disclose contractor, subcontractor, or grantee misconduct in any judicial or administrative proceeding relating to waste, fraud, or abuse on a federal award. Complying with these protections means that you will not be discharged, demoted, or otherwise discriminated or retaliated against as reprisal for disclosing such misconduct.

If you believe that you have been discharged, demoted, or otherwise discriminated or retaliated against as a result of reporting a violation of the Code, please bring the matter to the attention of the parties identified in Section 1 as soon as possible by submitting a formal report or complaint. Procedures for submitting fraud, waste, abuse, and whistleblower complaints are accessible on the Office of Inspector General Hotline (<https://oig.state.gov/hotline>).

2.2 Respect Others – Remember Why We Are Here And Who We Serve

The best way to respect others is to deliver on what we promise to our donors and beneficiaries in the most ethical and effective manner.

2.2.1 Do a good job – Give our donors and beneficiaries your best

How we help people is just as important as why we help people. Doing your best and giving your best means that you will earn respect by:

- Working within the best interests of Blumont, our donors, and our beneficiaries;
- Complying with all laws, regulations, and donor requirements;
- Avoiding conflicts of interest and the appearance of conflicts of interest; and
- Protecting our confidences and the confidences of our donors and beneficiaries.

2.2.2 Treat others as you wish to be treated – Non-discrimination is our Golden Rule

Whether in a Blumont office or in the field, Blumont employees are expected to respect the culture, people, customs, and institutions of the countries in which we serve; abide by applicable laws and regulations; and not interfere in internal or external political affairs. This respect extends to providing equal opportunity for all employees and not discriminating based on race, national origin, tribe, sex, sexual orientation, gender, gender identity, or religious beliefs. Our Code requires all of us to be open, inclusive and non-discriminatory in every way.

2.2.3 Communicate openly, honestly, effectively, and in a timely manner

Undertaking relief and development poses unique challenges. It is imperative that you communicate openly, honestly, effectively, and in a timely manner, both internally with Blumont colleagues and externally with Blumont donors, supporters, partners, regulators, and auditors. Communication is critical to our ability to deliver for our donors and to the beneficiaries of our work. All internal and external communication should be accurate, without exaggeration, omission, or alteration to create a false impression.

You should make yourself aware of Blumont’s social media policy, which provides guidance related to the disclosure of company information through social media networks (e.g., status updates and tweets), online chat rooms, on websites, or on blogs. Those guidelines can be accessed via the employee portal by clicking [here](#). In order to ensure consistent communication of our organization’s image, mission and values, the Communications Team (contact information below) is available for assistance and guidance on all Blumont-related social media. This office will assist all program and division staff, whether at HQ or in Field Offices, with the development and delivery of appropriate social media content.

2.2.4 Protect those in need and do not turn a blind eye - Prohibition against child abuse, trafficking in persons, and sexual exploitation

Children and displaced persons have unique safety and security concerns, and at Blumont we work to protect them from all forms of physical, verbal or psychological violence, injury or abuse, neglect, maltreatment or exploitation, including sexual abuse. Blumont employees, sub-awardees, contractors, and partners must understand and follow Blumont's Child Protection Policy (available [here](#)), which establishes our high standard of care and child-safe practices for protecting children from harm, abuse, and exploitation in any form.

Similarly, Blumont personnel are obliged to understand and follow Blumont's Trafficking in Persons (TIP) and Sexual Exploitation and Abuse (SEA) policies. That policy can be accessed via the employee portal by clicking [here](#). In short, Blumont personnel are prohibited from engaging in business with trafficked persons or traffickers. If you in the course of your work suspect trafficking is occurring, immediately notify an Blumont senior manager or make contact through Blumont's Ethics Hotline.

Blumont aligns with USAID's definition of trafficking in persons, which is drawn from the Palermo Protocol, established by the United Nations Office of the High Commissioner for Human Rights, and is in accordance with U.S. federal requirements under the Federal Acquisition Regulations (48 CFR 52.222-50). This protocol defines human trafficking as:

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 shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labor or services, slavery or practices similar to slavery, servitude or the removal of organs.¹

As a Blumont employee, sub-awardee, contractor, or partner, you must not engage in any form of trafficking or procure commercial sex acts, or use forced labor in connection with any Blumont activity. This includes, but is not limited to: employing or contracting with resources under terms that disobey local labor law or occur under false pretenses; withholding passports and/or visas to prevent free movement of employees/contractors; and failing to provide adequate transportation in and out of countries of work.

If you encounter any issues related to Child Protection, TIP or SEA, do not turn a blind eye or take matters into your own hands. Be safe, seek advice, and report any issues of concern to a senior manager or through the Ethics Hotline.

Employees and/or Supporters who are found to have engaged in these prohibited activities will be dismissed from employment and reported to the appropriate legal authorities.

¹ USAID, *Counter Trafficking in Persons Policy*, accessed 5/7/2015. http://pdf.usaid.gov/pdf_docs/PDACT111.pdf.

United Nations, Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, supplementing the United Nations Convention against Transnational Organized Crime, accessed 5/7/2015. www.ohchr.org/EN/ProfessionalInterest/Pages/ProtocolTraffickingInPersons.aspx.

2.3 Work Responsibly

It is essential that all employees, consultants, and others working for Blumont fully understand what it means to work responsibly. This section of the Code provides detailed guidance on the actions, behaviors, and conduct that should and should not be taken in working for Blumont.

2.3.1 We always promote ethics and compliance

We are responsible for 100% compliance with all laws and regulations in the countries where we work as well as the contractual requirements of our donor-funded agreements, and as an employee of Blumont that responsibility falls on you as well. You are charged with not only promoting and maintaining ethics and compliance within Blumont but helping to continuously improve our ethics and compliance culture. Promoting ethics and compliance means ensuring that you have the technical and professional skills necessary to perform at the highest level. To support you in this effort, Blumont offers mandatory training which provides knowledge on how to utilize the tools we have in place to ensure compliance.

2.3.2 Managers have a special role in promoting respect and a healthy ethical culture

All managers and supervisors — whether at Blumont Headquarters or in a field office — are expected to adhere to this policy and actively promote Blumont’s ethical culture. Managers and supervisors are expected to champion Blumont’s ethics and culture in all they do.

2.3.3 We treat candidates, vendors, and suppliers fairly

In order to meet our Mission, we must select employees, consultants, and business partners, which includes subcontractors, sub-grantees, and vendors or suppliers, based on objective criteria that would be met with approval if held up to later scrutiny. This means that we select the most qualified resources based on ethical hiring and procurement practices that comply with applicable laws and regulations. We believe that fair and open competition maximizes the likelihood that we will make the best choices when it comes to selecting employees, consultants, and business partners.

You must not engage in actions which limit competition, such as showing favoritism, sharing proprietary information, requesting or accepting kickbacks, accepting or requesting employment fees, or falsifying bids or other procurement documentation.

Likewise, you must not tolerate actions taken by potential business partners to engage in schemes that may harm fair competition such as agreeing to inflate bids, taking turns to compete, or otherwise manipulate the openness and fairness of a competitive process.

To help you make the best decisions related to potential business partners, you should refer to Blumont’s Procurement Policy, available [here](#) through the Blumont portal, and which sets forth the processes and procedures for obtaining goods and services. Questions regarding procurement may be answered by your supervisor or a representative of the Grants and Contracts team.

As to the selection of qualified employee candidates, Blumont recognizes that certain candidates, including former government officials, are contractually or ethically bound to certain post-employment restrictions. To avoid any conflicts of interest, Blumont will honor these restrictions and

ensure that our hiring practices will not compromise the procurement process. Similarly, when required by regulations or award terms and conditions, Blumont will disclose in writing any potential conflicts of interest to governments and donors (see 2 CFR 200.112 - *Conflict of Interest* for U.S. Federal requirements).

2.3.4 We compete honestly

We compete honestly and fairly for donor-funded projects. In proposal submissions, we will not improperly use donor source selection documentation or confidential competitor information, regardless of how it is received. Donor source selection information may include budgets, draft specifications or RFPs, or rankings related to proposals submitted. Confidential competitor information may include pricing, staffing, discount terms, or draft proposals. Fair competition also means that we will not intentionally underbid work for purposes of simply attempting to win the work; or collude with other offerors, suppliers, vendors or sub-recipients to otherwise limit competition or disrupt the acquisition/procurement process.

Regardless of local practices, Blumont strives to represent the best business practices according to U.S. law, in all countries where we operate.

2.3.5 We avoid unethical business practices and conflicts of interest

Grounding every customer, supplier, and other business partner relationship on sound business decisions and fair dealing is very important to Blumont's success. It is important to keep in mind at all times that while extending business courtesies can build goodwill, such actions can also create a perception of favoritism or special treatment that may weaken the integrity of our relationships.

Avoid actions that create actual conflicts of interest, as well as actions that create the appearance of conflicts of interest. In addition, Blumont personnel are required to report any conflicts of interest that may arise. Similarly, Blumont will report any potential conflict of interest to government sponsors and donors, as required.

The following list suggests some types of activities where employees must exercise caution. Discuss any doubts with the Chief Compliance Officer, Lauren Camilli (lcamilli@blumont.org):

- Using your position in the organization or knowledge of its affairs for outside personal gains;
- Serving in any capacity that might imply, without authorization, Blumont's approval of the policy, product, or service of any private enterprise;
- Accepting gifts, e.g., travel, living, or entertainment for yourself or members of your family, from anyone (including businesses) that are currently doing business, or seeking to do business, with Blumont;
- Taking a loan or borrowing from an organization that does business with Blumont;
- Accepting money or reimbursement of expenses from an individual or business that is competing with Blumont;
- Participating in a Blumont procurement (e.g., contract, subcontract, or sub-grant) if you or an immediate family member has a financial, organizational, or other interest (e.g., offer of employment) in an entity being considered or selected for an award;

- For former government officials: assisting or otherwise contributing input to a proposal or offer for which the former government official was responsible, and/or contributed to the definition of requirements, for the solicitation or request for award.

Any potential, apparent, or actual conflict of interest must be disclosed to the Chief Ethics and Compliance Officer to determine whether the conflict can be mitigated. Blumont employees must comply with annual requests to complete Form A., Disclosures of Potential Conflicts, available on the Blumont portal.

All Blumont employees should identify conflicts of interest and disclose them properly, and recuse themselves as necessary.

2.3.6 We do not offer or take bribes or kickbacks

Blumont employees must never offer, provide, or accept money or anything of value (e.g., gift, fee, commission, or loan) related to a business or employment transaction, regardless of whether the payment is made directly or indirectly, upfront or in return. The laws of the jurisdictions in which we operate prohibit bribery of any form, and as such, no bribery will be tolerated. Any identified instances of kickbacks that violate regulations, laws, or this Code must be reported. In turn, Blumont will report such instances to the respective government representative and donor.

2.3.7 We do not give or accept gifts as representatives of Blumont

a. We do not give gifts to government employees, suppliers, vendors, or partners

Blumont strictly prohibits any activity that could be perceived as an attempt to improperly influence, obtain, or reward favorable treatment by government employees, suppliers, vendors, or partners, even when there is no actual intent to influence an official government action or decision. This prohibition is consistent with this Code's policy on bribes and kickbacks, as well as Blumont's policy regarding compliance with the Foreign Corrupt Practices Act (FCPA) (found [here](#)), and other national anti-corruption laws.

Remember that in some countries, airport employees, customs officials, telecommunications staff, and medical professionals may be government employees. Giving gifts of any value can subject both Blumont and you personally to legal risk. The best practice is to simply not give gifts.

b. We do not accept gifts

In some countries, it is customary and lawful to give gifts or fees in exchange for business or consideration for employment. Blumont's policy is to refuse any gift that is given in the course of business conduct, including gifts from government officials, vendors, suppliers, or prospective employees. Again, any such gift may be construed as an attempt to curry favor and compromise the integrity of Blumont's business practices.

Blumont employees should be particularly sensitive to receiving gifts from beneficiaries because it may imply that our services are provided in exchange for the gifts. Particularly when services are directly provided to beneficiaries, it must be established at the outset of the program that Blumont staff cannot accept gifts of appreciation. Doing so will help avoid misunderstandings, offending the giver, or other awkward situations.

We know there may be certain circumstances where returning the gift or offering to pay for it may be an affront to the giver. In such cases, the employee may accept the gift on behalf of Blumont provided that the gift is reported immediately to his/her supervisor, who will then determine the appropriate disposition for any such gift.

2.3.8 We keep accurate records

It is essential that you carefully spend, track, and account for donor funds in compliance with donor requirements and Blumont policies. You must ensure that documentation and records are maintained carefully and accurately to demonstrate that the funds were spent appropriately. Accurate, complete, and truthful reporting and documentation also includes technical reporting. This includes all aspects of an award: pricing, performance, procurement, accounting, and reporting. This includes reports on project accomplishments, notes from meetings, recommendations, and explanations about any delayed implementation or other problems encountered.

In pricing, accounting, and reporting—whether internally or to an existing or potential client or sub-awardee—you must not submit data that is in any way inaccurate, incomplete, or misleading. Doing so is a false statement and subject to serious civil and criminal prosecution.

Likewise, you must not falsify, alter, or distort timesheets or other time records, cost reports, expense reports, pricing proposals, certifications relating to cost or pricing data, or requests for payment. Falsification includes changing a document after it has been signed or otherwise completed, unless the changes have been agreed to with the changes properly noted.

As an example, when you sign a timecard or other labor documentation, either by hand or electronically, you are certifying that the timecard accurately reflects how your time was utilized. Therefore, care should be taken to ensure that hours worked and costs expended are accurately recorded and properly charged to the account/project for which the work was performed and the costs incurred. You must complete your timecard every day, and never in advance—with the exception of documenting vacation time.

Intentional or careless false-reporting or mischarging will result in discipline up to and including termination. If you observe inappropriate behaviors or actions regarding timesheets or project charges, you are required to report them to a senior manager, the Chief Ethics and Compliance Office, or the Ethics Hotline.

The following policy documents relating to our commitment to working responsibly and keeping accurate records can be found on the Blumont portal:

- For detailed guidance on accurate time reporting, see Blumont’s [Timekeeping and Reporting policy](#), and also contact your immediate supervisor with any questions.
- Blumont’s standards on accurate pricing of opportunities can be found in the [Estimating Policy and Procedures Manual](#).
- Blumont’s policy and instructions on procurement practices can be found in the [Procurement Policy](#).
- Blumont’s policy and instructions regarding accurate accounting of costs and exclusion of costs that are not considered allowable by the government and/or donors can be found in the [Unallowable Cost Policy](#).

- Blumont’s policy and instructions on accurate accounting, monitoring, and reporting of program operations can be found in the [Program Operations Policy](#).

Finally, employees should never destroy, alter, or discard documents in a manner that would compromise Blumont’s Document Retention and Management Policy. This policy (which can be accessed via the employee portal by clicking [here](#)) is designed to ensure that Blumont complies with the documentation retention requirements of our donors, including the U.S. government. Destruction of documentation in a manner that conflicts with this policy can limit Blumont’s ability to demonstrate successful performance of work and impede the company’s ability to recover costs. Inaccurate forgery or falsification of documentation can be construed as a False Statement and subject to civil and criminal penalties.

In no circumstances is it appropriate to destroy documents related to an ongoing or potential investigation of Blumont by a government agency or any other official proceeding.

2.3.9 We cooperate with officials and auditors

Blumont employees are expected to cooperate with all officials and auditors fulfilling their oversight responsibilities for the financial reporting process, the system of internal control, the audit process, and the company’s process for monitoring compliance with laws and regulations and this Code. This includes both internal and external auditors engaged by Blumont, as well as Government auditors, including those from an Office of Inspector General, Special Inspector General, the U.S. Government Accountability Office (GAO), or similar oversight functions.

2.3.10 We abide by restrictions on lobbying, political activities, and charitable donations

Funds received from the U.S. government may not be used for lobbying activities or otherwise to influence legislation or elections. Likewise, Blumont funds, property, assets, services, and facilities may not be used to participate in any political campaign on behalf of, or in opposition to, any candidate for public office, or to contribute to any political party, campaign, political action committee, or public office-holder. While you are free to support political parties, candidates, and private charities as a private citizen on your own time with your own resources, you may not make a financial contribution in Blumont’s name or offer the facilities or services of Blumont to a charity without express written approval.

2.3.11 We protect the environment

As a Blumont employee, you should do your utmost to ensure your work respects the environment in which you are operating. We as an organization respect the natural environment of the communities in which we work. As such, you must comply with all applicable environmental laws.

2.3.12 We work safely

Relief and development work poses unique safety challenges, and we trust you will work in a manner that protects your own safety, the safety of your colleagues, beneficiaries of our work, as well as subcontractors and partners. You agree to comply with Blumont’s safety policies, plans, and procedures.

2.3.13 We obey the law

You agree to obey the laws in the jurisdictions in which we operate. Compliance with the law in many cases requires that we conduct due diligence on potential business and implementing partners. You may not make an award or permit an award at any tier to be made to any party that is debarred, suspended, or is otherwise excluded from, or ineligible for, participation in federal procurement activities. Before making an award, you will ensure, at a minimum, that the U.S. Government Excluded Parties List at www.sam.gov is consulted.

If you are working on a UN-funded project, you will need to check the list maintained by the United Nations Security Council (UNSC) sanctions committee established under UNSC Resolution 1267 (1999) <http://www.un.org/sc/committees/consolidated.htm>.

2.4 Protect Our Reputation, Information and Assets

2.4.1 Protect our reputation

Along with its people, Blumont's reputation is among its most precious assets. The trust our donors place in us to undertake the work we strive to do must be inviolate. By working honestly and ethically, our donors and the local communities with whom we work will continue to provide us the financial support that allows us to continue delivering on our Mission.

2.4.2 Do not share confidential information

At times, you may be entrusted with confidential or proprietary information about Blumont, its employees, our donors, and our beneficiaries. On such occasions, you must carefully protect proprietary information with a high standard of care. Refrain from disclosing any confidential or proprietary information to anyone outside Blumont, even in the event of and after your departure from Blumont. Confidential or proprietary information includes, but is not limited to, anything designated in writing as "Confidential," as well as any other non-public information that Blumont or its clients would consider confidential or proprietary.

The requirement to keep confidences does not preclude or prohibit any employee from making a disclosure of fraud, waste, abuse, illegality, or a Code violation, as designated in the Code.

2.4.3 Treat intellectual property with care

As a condition of your employment with Blumont, you have agreed to grant Blumont intellectual property rights to any work you may undertake, subject to donor regulations. These intellectual property rights generally preclude you from reproducing, distributing, or making any other use of Blumont work products outside Blumont. Just as you should take steps to protect Blumont's intellectual property, you should also avoid the unauthorized use of copyrighted materials of others, including material or logos that may be available without charge on the internet. You are also required to comply with license agreements that govern the use of software created and copyrighted by companies other than Blumont. Reproducing or installing software without authorization may violate these agreements and may be illegal.

2.4.4 Only use Blumont assets to support Blumont's Mission

Blumont assets, including information technology, office supplies, equipment, furniture, vehicles, and work space, are provided to Blumont employees in furtherance of Blumont's operations. Blumont employees are responsible for safeguarding these assets and ensuring they are used appropriately. Using Blumont assets for activities not related to an employee's duties, such as viewing or sending pornography; gambling; violating copyright or trademarks; conducting outside business, solicitation, or distribution activities; or for any purpose other than Blumont's work (except for limited, necessary personal communications, or as specifically authorized by Blumont) is prohibited.

Similarly, customer-provided assets or assets procured for specific awards (including government-furnished property or property acquired using Government project funds) should only be used for award purposes. Any use of such assets for purposes other than that specified by the donor or the award requires prior written approval from the donor.

III. Implementation

Blumont's ethics and compliance program is intended to ensure that Blumont and its employees:

- Follow internal policies and procedures;
- Comply with external regulations and statutes;
- Provide training and resources to staff regarding the Code;
- Understand their obligation to report misconduct and the protections afforded them when they report; and
- Implement appropriate internal controls to guard against waste, fraud, and abuse.

The Chief Ethics and Compliance Officer is responsible for the day-to-day administration, implementation, and oversight of compliance for Blumont, and reports to the Board of Directors and Blumont's President/CEO.

3.1 Compliance With The Code

3.1.1 Comply with our Code

Your obligation is to read, understand, and comply with our Code in all that you do to support our Mission.

3.1.2 Report suspected violations of our Code

Blumont requires that all employees, officers, and directors report any suspected violations promptly. Blumont will thoroughly investigate any good-faith reports of violations. Blumont will not tolerate retaliation of any kind for reports or complaints of misconduct that were made in good faith.

Open communication of issues and concerns by all employees without fear of retribution or retaliation is vital to the successful implementation of Blumont's ethics and compliance program, and the future success of Blumont.

Blumont has established a telephone hotline at 703-957-1500, an email hotline at hotline@blumont.org, and an online reporting tool at blumonthotline.com. Although we would encourage you to share your identity, there is always the opportunity for you to report anonymously if you choose to do so. To facilitate anonymous reporting, the telephone hotline is managed by an outside party and the online reporting tool provides the option to report anonymously.

All reports of alleged non-compliance and violations will be responded to appropriately, including an investigation of the offense to prevent further similar offenses. Violations that involve illegal behavior will be reported to the appropriate government authorities. Blumont may discipline any employee, officer, or director whose conduct violates applicable laws, regulations, or basic tenets of the Code.

The table below is intended to provide you with an easy reference regarding reporting of suspected violations of this Code, Blumont policies, or government regulations.

WHAT	TO WHOM	HOW
<p>Blumont expects you to report all suspected violations of this Code, company policies, and/or Government regulations.</p> <p>This includes but is not limited to: suspected violations of the Code of Conduct, timekeeping policies, pricing policies, procurement policies, program operations policies, or accounting policies and procedures.</p> <p>Keep notes of all details.</p>	<p>To reach Blumont’s Ethics Hotline via phone or email: 703-957-1500, hotline@ird-dc.org, or online reporting tool at: www.blumont hotline.com.</p> <p>In addition, suspected violations can also be reported to the President/CEO, Chief Compliance Officer, or any member of Blumont’s executive management.</p>	<p>Your report should include:</p> <p>The country, the project, the donor, and the individuals at issue. Describe the problem as clearly as possible.</p> <p>You are encouraged to share your identity, however, if you wish to remain anonymous you may do so. Always ensure your information is truthful, and include details on how you came to know about the problem, how long you think the problem has been going on, and any other details you may know that will help in the evaluation of the problem.</p>

3.1.3 Non-Retaliation

Blumont will not tolerate retaliation against anyone who, in good faith, makes a report of any violation or suspected violation under this Code or any other Blumont policy. Any such retaliation would be considered a serious violation of this Code and result in appropriate disciplinary action. Such action may include termination of employment, and in some cases, referral to government officials, which could result in the imposition of criminal or civil liability.

3.2 Consequences For Failure To Comply

The matters addressed in Blumont’s Code are of the utmost importance to Blumont, and compliance with the requirements contained herein is essential to Blumont’s ability to conduct its business in accordance with the law, Blumont’s Mission, and its stated values. Accordingly, it is expected that all Blumont employees strictly adhere to the Code in carrying out their duties.

Blumont will take appropriate action against any employee whose actions are found to violate the Code. Such action may include immediate termination of employment at the firm’s sole discretion. In addition, where Blumont has suffered a loss as the result of an employee's violation of the Code, Blumont may pursue any available remedies against the employee responsible.

IV. Training, Reinforcement and Acknowledgement

4.1 Training

To ensure that all company employees understand the Blumont Code of Business Ethics and Conduct, all employees are expected to be trained on this Code within 30 days of hiring and annually thereafter.

4.2 Reinforcement

Maintain the highest standards of ethics and compliance by doing the following:

Be prepared and lead by example:

- Know the Code;
- Know Blumont’s Policies and Procedures and your job;
- Understand that you may encounter situations that require an ethical choice; and
- Watch out for ethical or legal “red flags” that may signal a tough decision down the road.

Be deliberate and know your job:

- Know that implementing programs occasionally involves ethical decision-making;
- Consider whether you think a particular decision is fair, right, ethical, and based on objective information;
- Weigh alternative options and solutions and consider the risks and consequences of your actions;
- Ask: Is this what the donor wants? Does this help the beneficiaries? Does this uphold Blumont’s Vision, Values, and Mission? Am I doing the right thing?
- How will others view my decision or action? Will others think I did the right thing?
- Use and account for funds in a responsible manner;
- Operate in full compliance with our funding agreements; and
- Earn and protect the public’s trust through our exemplary work.

Know you have help on your side:

- Consult the Code or Employee Manual for guidance;
- Seek the counsel of trusted colleagues, supervisors or any Blumont senior manager or Board member;
- Weigh advice received and do what you think is right, what you think the donors want, and what you think is in the ultimate best interests of beneficiaries; and
- Know that the Chief Compliance Officer is always available for advice.

Stand by your decision and always model ethical behavior:

- Doing the right thing may at times be the most courageous thing you do at Blumont;

- In doing the right thing, document it where possible, and be prepared to answer anyone who asks (e.g., colleagues, our donors, a government official) why you did the right thing; and
- Be a role model for others, showing that living our Vision, Values, and Mission can be done in an ethical, professional, respectful, accountable, and collegial manner.

4.3 Acknowledgement

To document training and demonstrate acknowledgement of understanding of Blumont's Code of Business Ethics and Conduct, all employees are required to complete an acknowledgement of training and understanding utilizing the acknowledgement form at the end of this policy. Evidence of training through the acknowledgment form will be retained in each employee's master file within Blumont's Human Resources department. A copy of that form and instructions for its submission can be found on page 23 of this document.

V. Code of Conduct Summary:

1. Do What Is Right - Act Ethically Every Day

2. Report Problems -Speak Up Early

1. Report misconduct, fraud, waste, and abuse.
2. Blumont will not retaliate against you for reporting.

3. Respect Others - Remember Why We Are Here And Who We Serve

1. Do a good job; Give Blumont's donors and beneficiaries your best.
2. Treat others as you would wish to be treated; Non-discrimination is our Golden Rule.
3. Communicate openly, honestly, effectively and in a timely manner.
4. Protect those in need; do not turn a blind eye to child abuse, trafficking in persons, or sexual exploitation.

4. Work Responsibly

1. We always promote ethics and compliance.
2. Managers have a special role in promoting respect and a healthy ethical culture.
3. We treat candidates, vendors, and suppliers fairly.
4. We compete honestly.
5. We avoid unethical business practices and conflicts of interest.
6. We do not offer or take bribes or kickbacks.
7. We do not give or accept gifts as a Blumont representative.
8. We keep accurate records.
9. We cooperate with officials and auditors.
10. We abide by restrictions on lobbying, political activities, and charitable donations.
11. We protect the environment.
12. We work safely.
13. We obey the law.

5. Protect OUR REPUTATION, INFORMATION, AND ASSETS

1. Protect our reputation.
2. Do not share confidential information.
3. Treat intellectual property with care.
4. Only use Blumont assets to support Blumont's Mission.

Appendix

5.1 Frequently Asked Questions

GENERAL

Q – What happens if I violate the Code of Conduct?

A – Blumont takes compliance and its Code seriously. If you are found to have violated our Code, we will seek appropriate disciplinary action, up to and including termination of employment, in accordance with the type and severity of the violation. Potential action could also include referral to the Office of the Inspector General of the relevant Federal agency, a potential outcome from which could be debarment. Once debarred, individuals are precluded from serving on U.S. Government-funded awards, which can also lead to indirect debarment from other organizations such as the United Nations and World Bank. Simply put, violation of the Code can effectively result in you being banned from work within the development community and other government-funded work.

Q – I’m here to help others. I don’t want to get anyone in trouble. Do I really have to report?

A – Yes, you are obliged to report all Code violations. While difficult, working for Blumont requires you to do many challenging things, including reporting any suspected violations of the Code.

Q – What if I am not really sure?

A – Report what you know as best you can. You have an obligation to report all suspected violations of this Code or any misconduct. Others will review and decide if further action or information is needed.

Q – What if I am wrong?

A – In pertaining to violations of the Code, we hope that you are. But it is not your job to worry if you are wrong. If you have a good-faith belief that there is a problem, report what you know as best you can. Again, others will review and decide if further action or information is needed.

Q – What if I report something and someone gets fired?

A – Unfortunately, you may have a colleague who has made a bad choice, for which you are not responsible. Living our Code means that those who make choices contrary to our vision and values must live with the consequences of their own actions.

Q – What if someone finds out that I made a report?

A – You have the choice to report anonymously. Regardless of how you report, Blumont will do its best to keep sources of information pertaining to violations of the Code confidential. While we can’t guarantee word of your report will not somehow be revealed, we can guarantee that retaliation against you for making the report will not be tolerated. Retaliation is not only against our Code, it is against the law.

Q – If I make a report, what happens next?

A – Blumont takes every report seriously. We have a process for logging and evaluating reports in a common tracking system. Depending on the issue, the report will be assigned a review team that may be comprised of Blumont staff and external investigators. The review team will collect the facts by reviewing documents and potentially conducting interviews. You may be asked to provide additional information. As Blumont addresses all reports professionally and discreetly, you will not receive reports as to the status of the review. But please be assured that the report has been received and is

being taken seriously. It may be the case that due to the nature of the allegations, it may take some time before the effects of the report are revealed. Please understand that if evidence supports the report, appropriate donor agencies will be informed for corrective action. It may also be the case that allegations made cannot be supported based on the information available. If this happens, it does not mean that your report was not taken seriously; you are still encouraged to continue to report performance and compliance issues.

PERSONAL CONDUCT

Q – Does Blumont’s Code of Conduct apply to me all the time, even after hours?

A – Blumont’s Code of Conduct applies to your work at Blumont, but if you behave in a manner outside of work that indicates you do not respect others and do not agree with the Code, you will be held accountable. We would hope that the principles you agree to follow at work would be consistent with those that guide you in your personal life.

GIFTS

Q – I know that I am not permitted to solicit or accept gifts in my roles at Blumont. Aren’t there exceptions when I should accept a gift, such as when a beneficiary is genuinely grateful for our assistance?

A – As we perform our work, it should always be made clear that our assistance is provided without expecting any gifts or compensation in return. However, we understand that there are times when refusing a gift would offend the giver. In such cases, you may accept the gift on behalf of Blumont provided that you report the gift immediately to your supervisor who will then determine the appropriate disposition for any such gift.

BRIBERY AND SAFETY

Q – I know what a bribe is, but what happens if my safety is threatened? For example, a guard demands payment for letting me pass? Or an officer uses his weapon to demand money?

A – If you genuinely feel threatened that you’ll be hurt, then absolutely pay the demand. A life-threatening situation is very different from bribery. Your safety is the priority. If your life is threatened and you must pay, remove yourself from the danger as quickly as possible, and immediately report it to your supervisor and Blumont security.

TREAT CANDIDATES, VENDORS, AND SUPPLIERS FAIRLY

Q – I understand Blumont’s policy about selecting the best employees and the best implementing partners, but what if my relative or my friend is really the most qualified to help us meet our mission of helping people? Or, what if the beneficiaries tell me who the best is to help? Shouldn’t I listen to them because they know best? Or, what if a government official tells me who to hire? Then what?

A – Even the appearance of a conflict of interest in an award decision could have serious consequences for Blumont. If you are a decision-maker, you must ensure that decisions are made fairly and impartially. If you are friends with a candidate, vendor, or supplier, you must completely

remove yourself from the decision making process to avoid the appearance of a conflict of interest. Blumont’s guidance on conflicts of interest is found on the Blumont portal.

Q — Do I really have to give everyone an “equal opportunity” even if I believe that some groups of people are better than others?

A — At the core of our Values, we are committed to providing equal opportunity to all. This means that we do not discriminate against people for their national origin, race or family background, gender or gender identity, sexual orientation, or religious beliefs. It also means that we do not provide favors or special treatment for certain people. In other words, we treat everyone fairly and with respect.

OBEY THE LAW

Q - What if what I do violates the Blumont Code, but is not illegal under the laws where I am working?

A – Blumont respects and follows the laws in all jurisdictions in which it operates. However, there are times when Blumont’s Code may hold you to a higher standard. If you violate Blumont’s Code, inclusive of reporting on Code violations, you will be subject to the appropriate sanctions.

REPORTING

Q - What if someone makes a false report about me?

A – Making a false report is a violation of our Code. If you have followed the Code and followed Blumont’s policies and procedures, then the review of the false allegation should be resolved satisfactorily. Unfortunately, it is sometimes difficult to distinguish a good-faith report from a malicious report undertaken in bad faith.

To make it as easy as possible to ensure that false reports will be recognized as such, always make sure your actions are transparent and in accordance with the Code.

COMPETE FAIRLY

Q - What if I get some inside information on a competitor? Like a copy of their current proposal or budget? Is it ok to use it?

A – No. Our Code demands honesty and integrity. Using a competitor’s information to improve our competitive standing is dishonest. We should rely on the strength of our employees, our experience, and our proposed approaches to a project to win awards. If you receive inside information such as a copy of a proposal, do not share it. Instead, bring it to the attention of the Chief Compliance Officer.

The Procurement Integrity Act sets forth the rules for competition. Check the Blumont portal for training information on the [Procurement Integrity Act](#).

BLUMONT ASSETS

Q - I know of people who use their company vehicles to go to lunch or run errands. Can I use our vehicles or government-furnished vehicles for my own private use?

A – No, Blumont vehicles, like all Blumont assets are for the exclusive use of our donor-funded projects. The same is true for government-furnished vehicles or assets. If you have a concern about the misuse of any Blumont assets, including vehicles, by colleagues, please report your concerns through our normal reporting processes. If you have any questions about vehicle usage, please consult Blumont’s Vehicle Policy on the portal.

POLITICAL ACTIVITIES

Q – Are you saying that I cannot support a political candidate or party? Don’t I have the right to vote for whoever I want?

A – No, what we are saying is that you cannot use Blumont assets such as computers, vehicles, or staff time from engaging in political activities. You are permitted to make voluntary contributions to political candidates or parties, or participate in the political process, and engage in other lawful political events or activities, but it must be done on your own time.

MORE INFORMATION

Q – Where do I find more information about the Blumont Code, business operations, and policies and procedures?

A – Blumont’s policies and procedures are housed on Blumont’s portal. The portal site is <http://portal.ird.org>. The portal will have the most current policies.

VI. Acknowledgement and Pledge

I recognize that my participation in, and demonstrated understanding of, the Code and of Blumont and donor obligations is critical to Blumont and my success as an employee. I further recognize that my participation and performance in Blumont training programs will be incorporated into, and be an important part of, my annual performance evaluation.

I have received, read, and understood Blumont's Code of Business Ethics and Conduct. In addition, I have completed my annual training requirements regarding the Code. By signing this acknowledgement, I pledge:

- I have completed the annual training requirement related to this Code;
- To abide by our Code and to not tolerate, ignore, or otherwise assist others in violating our Code;
- To raise any questions regarding our Code, or any of the laws, regulations, or donor obligations related to my work at Blumont with my supervisor, any senior manager, any member of the Blumont Board of Directors, and Blumont's Chief Ethics and Compliance Officer;
- To report any perceived violation of our Code or any other violation of company policy and/or government or donor requirements in a timely manner;
- To take action to rectify any Code violations I observe or concerns I raise;
- To participate and to encourage others to participate in training related to our Code;
- To be a role model of ethical behavior in all I do at Blumont in support of our Mission;
- To not retaliate against others for abiding by the Code, including reporting potential violations;
- To not diminish the sanctity of the Code by misusing the hotline to intentionally report inaccurate information for personal gain or in attempt to damage others.

Employee Name

----- Date -----
Signature

Please sign and return a copy to the Human Resources department at Blumont's corporate headquarters or via email to compliance@ird.org.

