

## THE POPULATION COUNCIL GLOBAL CONDUCT POLICIES

The Council Conduct Policies section of The Population Council, Inc.'s Policies and Procedures (P&P) provides information regarding the Council's obligation to ensure orderly operations and provide the best possible work environment for our employees, volunteers, fellows and interns. These policies were established in order to protect the interests and safety of all individuals and the organization. Below you will find brief descriptions of these policies. Full descriptions of these policies can be found on the Council's intranet (internal web site), under Policy Center, Policy by Category, Employee Conduct, at the following link: <https://popcouncilglobal.sharepoint.com/sites/PolicyCenter>. At the end of this summary document, your signature is required to acknowledge that you have read, understand, and will abide by the full policies at these links. If you've received this document via email, please print the form, sign and date it, and return to Human Resources at Council Headquarters.

- **Anti-Trafficking Policy**

<https://popcouncilglobal.sharepoint.com/sites/PolicyCenter/SitePages/Anti-Trafficking.aspx>

It is the policy of the Population Council to fully comply with the U.S. government's laws, regulations, and policies prohibiting trafficking in persons by government contractors and award recipients, including, but not limited to, [USAID's Standard Provision M20 for U.S. Nongovernmental Organizations \("Trafficking in Persons"\)](#), as more fully set forth in this policy. All Council employees, subawardees or contractors at any tier are strictly prohibited from engaging in trafficking in persons, procurement of commercial sex acts, use of forced labor, and acts that directly support or advance trafficking in persons. The Population Council ("The Council") has developed a Model Anti-Trafficking Compliance Plan in accordance with the U.S. Government's zero-tolerance policy regarding trafficking in persons by government contractors and award recipients.

The Council opposes all forms of human trafficking, including sex trafficking, forced labor, and prostitution, because they are inconsistent with its mission. The Council is therefore committed to mitigating the risk of trafficking in persons in connection with its operations and programs.

- **Bullying Policy**

<https://popcouncilglobal.sharepoint.com/sites/PolicyCenter/SitePages/Bullying.aspx>

Bullying in the workplace negatively affects all concerned. It harms the morale and productivity of employees and can damage the reputation of the organization. The Council is committed to ensuring a civil work place, free from all forms of bullying and expects all staff members to uphold this policy by treating one another with courtesy and respect.

- **Child Protection Policy**

[https://popcouncilglobal.sharepoint.com/sites/PolicyCenter/SitePages/Child-Protection\(1\).aspx](https://popcouncilglobal.sharepoint.com/sites/PolicyCenter/SitePages/Child-Protection(1).aspx)

The Council believes that all children, regardless of age, race, gender, socio-economic status or cultural background deserve the opportunity to live full and productive lives and to be free from all forms of abuse. It is the policy of the Council to strive to empower children to reach their full potential and to keep the children who participate in Council work safe from harm.

- **Close Personal Relationships**

<https://popcouncilglobal.sharepoint.com/sites/PolicyCenter/SitePages/Close-Personal-Relationships.aspx>

The Population Council seeks to provide fair and equitable employment opportunities to all persons. However, close personal relationships between a manager and a staff member may lead to complications such as charges of discrimination, conflict of interest, favoritism, or impropriety. To ensure that these relationships do not influence decisions on hiring, promotion, or termination, the Council does not permit managers to hire or supervise staff members with whom they have close personal relationships.

- **Confidentiality of Personnel Information**

<https://popcouncilglobal.sharepoint.com/sites/PolicyCenter/SitePages/Confidentiality-of-Personnel-Information.aspx>

All information concerning Population Council current and former personnel, including but not limited to salaries, home addresses, and telephone numbers is considered strictly confidential.

- **Conflicts of Interest – Full Policy**

<https://popcouncilglobal.sharepoint.com/sites/PolicyCenter/SitePages/Conflicts-of-Interest.aspx>

It is the policy of the Population Council that its staff members conduct the affairs of the Council in accordance with the highest legal, ethical, and moral standards. This policy statement is not intended to call into question the loyalty, fidelity of service, and respect for the Council that its staff members demonstrate. Rather, it is designed to reinforce a standard of conduct that avoids both actual conflict of interest and the appearance of conflict of interest; reflects credit in the eyes of the public on the Council and its staff members; and protects the reputation, financial well-being, and legal obligations of the Council.

- **Conflicts of Interest – Institutional Financial Conflicts of Interest in Research Policy**

<https://popcouncilglobal.sharepoint.com/sites/PolicyCenter/SitePages/Conflicts-of-Interest—Institutional-Financial-Conflicts-of-Interest-in-Research.aspx>

It is the policy of The Population Council that the design, conduct, and reporting of its research will not be affected by the possibility that the Council or a Council official or his or her immediate family member may derive a financial benefit from the commercialization of the outcome of Council research. This policy provides a definition as to what constitutes an institutional financial conflict of interest in research (IFCIR), circumstances that may create an actual or potential institutional conflict of interest in research, and guidelines for preventing, identifying, and addressing an actual or potential institutional financial conflict of interest in research.

For more information, please read the full [Institutional Financial Conflicts of Interest in Research Policy](#).

- **Conflicts of Interest – Outside Remuneration**

<https://popcouncilglobal.sharepoint.com/sites/PolicyCenter/SitePages/Conflicts-of-Interest-Outside-Remuneration.aspx>

**A. Financial Conflicts of Interest:** A staff member shall not make a decision on behalf of the Council when the decision involves determining: (1) whether the Council should do business with an individual with whom the staff member does not have an arm's-length relationship; (2) whether the Council should do business with an entity in which the staff member alone or with his or her immediate family members has an ownership interest of more than 35 percent; or (3) whether the Council should do business with an entity from which the staff member or his or her immediate family members receive or will receive compensation. (For related information on compensation in the form of gifts, refer to section on [Gifts](#).)

See also **B. Participation in Outside Activities That Are Within the Scope of Council Duties**, and **C. Participation in Outside Activities That Are Outside the Scope of Council Duties**.

- **Contracts with Private Sector Organizations**

<https://popcouncilglobal.sharepoint.com/sites/PolicyCenter/SitePages/Contracts-with-Private-Sector-Organizations.aspx>

Information relating to the Council's contracts with private sector organizations is confidential. It is the Council's policy that such information remains confidential.

- **Discrimination, Harassment and Retaliation**

<https://popcouncilglobal.sharepoint.com/sites/PolicyCenter/SitePages/Discrimination,-Harassment-and-Retaliation.aspx>

The Population Council is committed to providing a courteous workplace in which all staff members are treated with dignity and respect. This policy protects the right of employees to work in an environment free from discriminatory harassment, sexual harassment, ridicule, or insult.

- **Fraud and Other Corrupt Practices Policy**

<https://popcouncilglobal.sharepoint.com/sites/PolicyCenter/SitePages/Fraud-and-Corruption.aspx>

Fraud and other corrupt practices deplete the financial and other resources of an organization that are needed to carry out its mission activities and operations, can result in legal sanctions against the organization and/or its employees, and cause damage to the reputation of the organization and those associated with it. It is the policy of the Population Council, Inc. (the "Council") that all of its activities and operations be carried out free of fraud and other corrupt practices (the "Policy"). The Council has zero tolerance for all fraud and corruption.

- **Illegal Use of Controlled Substances**

<https://popcouncilglobal.sharepoint.com/sites/PolicyCenter/SitePages/Illegal-Use-of-a-Controlled-Substance.aspx>

The Drug-Free Workplace Act of 1988 ("the Act"), requires that federal contractors and federal grant recipients certify that they will maintain a drug-free workplace. In compliance with the Act, all staff is absolutely prohibited from the unlawful manufacture, distribution, dispensation, possession or use of a controlled substance at any location where Council business is conducted. Violation of this policy could result in immediate dismissal. In addition, if a staff member is convicted of violating a criminal drug statute in the workplace, s/he must inform Human Resources of such conviction within five days of the conviction. Failure to do so could also result in immediate dismissal. If the Council does not comply with the requirements of the Act, it risks the suspension and/or termination of major contracts and could even be barred from any government work for up to five years. By signing this form, a staff member states that they will adhere to The Drug-Free Workplace Act.

- **Intellectual Property**

<https://popcouncilglobal.sharepoint.com/sites/PolicyCenter/SitePages/Intellectual-Property.aspx>

■ **ROYALTIES - PUBLICATIONS**

From time to time staff are called upon to write or edit professional publications in connection with their duties at the Council. The matter of ownership of any royalties that result from these publications will be decided between the staff member and the appropriate Executive Team member. The staff member and the Executive Team member should plan to meet on two separate occasions to discuss this matter. An initial discussion will take place prior to the staff member's undertaking any work on the document. At that time the staff member and the Executive Team member will discuss fully the intentions, the components, and the scope of work of the assignment. Based on these discussions a projection will be made concerning where "ownership" of the material will lie. A second discussion will be held upon completion of the assignment in order to review the earlier projections and to make a final decision on whether royalties will go to the Council, to the staff member, or be divided in some proportion between the two. When a final decision has been reached, the Executive Team member should prepare a memo outlining the agreement.

■ **ROYALTIES - INVENTIONS**

Council staff who are involved with scientific research are asked to sign an [Employees Patent Agreement form](#). This agreement specifies that staff will assign to the Council all rights and title in all inventions which relate in any way to actual or anticipated areas of Council activity, and that staff will not disclose confidential information concerning this work during or after employment with the Council.

In the event that a Council invention is licensed for use other than by the Council, the Council inventor(s) shall be entitled to share in the net royalty income derived by the Council. The Inventor will receive an amount equal to 50% of the first \$100,000 of the net royalty income realized by the Council and 10% of the net royalty income realized thereafter. The full Patent Policy and the associated Invention Disclosure form can be viewed [here](#) and [here](#). All staff involved with scientific research are required to sign the Agreement form.

- **Misconduct in Science**

<https://popcouncilglobal.sharepoint.com/sites/PolicyCenter/SitePages/Misconduct-in-Science.aspx>

The Public Health Service (PHS) has instituted a ruling which requires each institution that receives or applies for a research, research-training, or research-related grant or cooperative agreement under the Public Health Service act to submit an annual assurance certifying that the institution has established administrative policies regarding procedures for dealing with and reporting misconduct in science. This policy applies to all scientists and other personnel involved in the conduct of biomedical or behavioral research projects.

- **Safeguarding**

<https://popcouncilglobal.sharepoint.com/sites/PolicyCenter/SitePages/Safeguarding.aspx>

Vulnerable adults and children are the key populations with which we work. The Council has zero-tolerance for all forms of exploitation including sexual abuse, harassment, bullying, and neglect, and it is our policy to ensure the safety of and protection from such behaviors. We implement this policy through safeguarding measures, reporting, and monitoring procedures that are incorporated in our research and program interventions.

- **Solicitations**

<https://popcouncilglobal.sharepoint.com/sites/PolicyCenter/SitePages/Solicitations.aspx>

Solicitations are generally not permitted during working hours. This includes solicitations for Council employees on the occasion of illnesses, family financial problems, deaths, etc., as well as solicitations for purposes unrelated to Council business.

The term solicitation includes, but is not limited to, requesting funds, signatures, handing out promotional literature or gifts, offers to sell or buy anything, and conducting a membership drive. Exceptions to this policy are authorized by Human Resources.

- **Whistleblower Policy**

<https://popcouncilglobal.sharepoint.com/sites/PolicyCenter/SitePages/Whistleblower.aspx>

It is the policy of the Population Council that the Council will not retaliate against a staff member who makes a good faith report about a Council policy, activity, or practice that is illegal or unethical, or a good faith report about an illegal or unethical activity of another staff member that is related to the Council. A staff member who makes such a report is referred to as a whistleblower.

- **Workplace Problem Solving**

<https://popcouncilglobal.sharepoint.com/sites/PolicyCenter/SitePages/Workplace-Problem-Solving.aspx>

The Council recognizes that workplace problems which are not easily solved may arise from time to time. These problems may include two or more staff members who aren't getting along, but also include staff members who are unhappy with a particular circumstance(s) that affects their work and productivity. The following suggested guidelines outline recommended steps for resolution of these problems.

My signature below signifies that I have reviewed these policies as they appear on the Council's internal web site (intranet), understand their content, and will abide by them in all respects.

I understand that in addition to signing this form, I am required to sign separate documents/agreements for the following policies:

*Conflicts of Interest:*

[Conflict of Interest Disclosure Form](#) (This form must be completed upon hire and as potential conflicts arise.)

[Financial Disclosure Form for Staff Members Engaged in Research](#) (This form must be completed upon hire, annually, and as potential conflicts arise.)

*Intellectual Property:*

Employee Patent and Confidentiality Agreement: <https://popcouncilglobal.sharepoint.com/sites/PolicyCenter/SitePages/Workplace-Problem-Solving.aspx> (This form must be signed upon hire.)

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Print Full Name: \_\_\_\_\_