



# Code of conduct



NOVEMBER 2020

## Table of Contents

Message from the Pact President & CEO .....3

Our Mission and Vision ..... 4

### **Integrity** .....5

- Program Integrity
- Third Parties
- Fiscal Integrity
- Donor Restrictions
- Timesheets and Expenses
- Signing a Contract
- Financial or Accounting Irregularities
- Bribery and Gifts
- Vendors
- Conflicts of Interest
- Intellectual Property

### **Respect** ..... 8

- Harassment-free Workplace
- Protecting Adults and Children from Exploitation and Abuse
- Combatting Trafficking in Persons
- Confidentiality
- Use of Pact's Equipment
- Political Engagement
- Respect for the Environment

### **Inclusion** .....11

- Teamwork
- Diversity
- Equal Employment Opportunities
- Substance Use in the Workplace
- Workplace Violence
- Global Safety and Security

### **Accountability** ..... 13

- Who Must Follow the Code?
- What If I Have a Question or Concern?
- Am I Protected from Retaliation?
- How Does the Ethics & Compliance Hotline Work?
- When to Use It
- Features of the Hotline
- Confidentiality
- The Process
- Bad Faith
- Are There Consequences for Code Violations?

Conclusion ..... 14

# Message from the Pact President & CEO

Dear Colleagues:

We are pleased to share with you Pact's new Code of Conduct: **Integrity**, **Respect** and **Inclusion**.

The Pact Code of Conduct is our guide to putting into practice our three core values: Integrity, Respect and Inclusion. These values help us succeed in our duty to ensure a fair workplace, to responsibly serve local communities and to act as honest stewards of the funds entrusted to us.

Integrity is the moral foundation of everything that we do. We must be honest with ourselves, our partners, program participants, donors and communities that we serve. The aim of this Code is not to cover every possible situation that you may encounter, but to encourage you to strive for the highest possible moral and professional standards in everything that you do at Pact.

Respect is what we must unfailingly show each other and the people we serve. Respect is put into action when Pact employees work in teams and across functions and countries, in a professional, collaborative and empathetic manner. It also requires us to approach every person we serve with an open mind, with an understanding of their perspective and experience.

Inclusion is the key to putting people at the center of everything we do. We are proud of the excellent work and impact that Pact employees have accomplished through the years, and their commitment to doing more. The best way to support you is to provide a working environment where you can flourish and in turn, you can create safe and inclusive environments for others.

To put our values into practice, it is incumbent on each of us to be accountable for every action and inaction at Pact. Each of us is responsible for acting ethically and just as importantly, for ensuring that others also act ethically and for reporting our failings so that we are given the opportunity to do better.

Please join us in affirming our commitment to always incorporating the Code of Conduct in our daily work life at Pact.

A handwritten signature in black ink, appearing to read 'C. E. Smith'.



# Our Vision and Mission

## VISION

A world where everyone owns their future.

## MISSION

We build systematic solutions in partnership with local organizations, businesses and governments so that there are thriving, resilient communities where people are heard, capable and vibrant.





# Integrity

*Our reputation is our most valuable asset and we must continuously earn it.*

## Program Integrity

Pact has a clearly stated mission and purpose, approved by the Board of Directors, in pursuit of the public good. Our programs should be designed to support that mission and to be responsive to the needs of the communities we serve and to changes and innovations in the fields of our activities. Pact is committed to transparency and fairness in reporting to our stakeholders, including program participants, donors, civic organizations and local communities. Every employee is responsible for ensuring that all program proposals, operations and reports are complete and accurate in all material respects.

## Third Parties

The key question to ask yourself in evaluating a partner, subrecipient or vendor is this: can we trust them? It is your responsibility to conduct appropriate [due diligence](#) and continually evaluate third parties who are chosen to work with Pact. When Pact engages in these professional relationships, we are effectively vouching for the reputation, performance and internal practices and controls of these individuals and organizations. Please engage in these relationships with great care.

## Fiscal Integrity

As a 501(c)-certified nonprofit, the money we spend on behalf of Pact is not ours; that money belongs to others and is granted to our care to spend as designated for programs, innovation and the betterment of the organization and people we serve. Every person at Pact and working with us has a role in making sure that money is appropriately spent, and our financial records are complete and accurate. To get this right, you have a role in complying with Pact's system of internal controls to meet our obligations in every country where we operate.

- **Donor Restrictions**

Each Pact employee has a fiduciary duty to expend funds consistent with the organization's mission and donor intent. You are responsible for learning about the requirements and restrictions of the programs on which you are working. If Pact loses the trust of the donors that fund our work, it may take years to repair the damage to our hard-earned reputation.

Government funds, including those from the United States Government, are subject to regulations and laws that make it illegal to submit or cause the submission of false or fraudulent claims, records or statements to obtain payment from the government. Violations of these laws, as well as Pact policies, can result in both civil and criminal penalties.

- **Timesheets and Expenses**

You must always be honest about timesheets and expense reports; it is that simple. When you submit an expense for reimbursement or spend money on Pact's behalf, make sure that the cost is reasonable, directly related to the organization's mission and supported by appropriate documentation. Managers are responsible for all money expended by their direct reports and must carefully review timesheet and expense report submissions before approving.

- **Signing a Contract**

It is a big deal to sign a contract on Pact's behalf regardless of your position in the organization. You may not sign a contract unless you are authorized to do so under a Power of Attorney or the [Signature Authority Policy](#). Even if you are authorized to sign a contract, please ensure that the contract is in the best interest of the organization.

- **Financial or Accounting Irregularities**

You should never falsify any Pact transaction, record or account. You are required to cooperate with any financial audit. If you suspect or observe any of the conduct mentioned above or, for that matter, any irregularities relating to financial integrity or fiscal responsibility, immediately report them to the [Ethics & Compliance Office](#) or Pact's ethics reporting hotline, [EthicsPoint](#).

## Bribery and Gifts

Like all organizations, Pact is subject to many laws across the world that prohibit bribery in virtually every kind of transaction. The rule for us at Pact is simple - don't bribe anybody, anytime, for any reason.

Pact also has a no-gift policy. You should not provide gifts, entertainment or other business courtesies to others or accept them from others as part of your work at Pact. Generally, acceptance or giving of inexpensive, non-cash "tokens," such as small items or foods of nominal value, is permissible. If you have any questions, please contact the [Ethics & Compliance Office](#).

We want to avoid the possibility that any gift, entertainment or other business courtesy could be perceived as a bribe or as a conflict of interest. This is especially problematic when you are dealing with government officials who are subject to strict rules against soliciting or accepting anything of value.

## Vendors

We should always strive for the best possible deal for Pact. This almost always requires that you solicit competing bids to make sure that you are getting the best offer. While price is very important, it isn't the only factor worth considering. Quality, service, reliability and the terms and conditions of the proposed deal may also affect the final decision. For more information, view Pact's [Value for Money Policy](#) and [Procurement Policy](#).

## Conflicts of Interest

When you're in a situation in which a potential action could benefit you, your friends, family or an associated business, at the expense of Pact and our stakeholders, then you are facing a perceived or actual conflict of interest. You should hit pause before taking that action. You have two choices: (1) avoid taking that action and creating a potential conflict; or (2) consult with your Pact manager and/or the [Ethics & Compliance Office](#) to discuss the potential conflict of interest and an approved course of action. For more information, please view the [Conflict of Interest Policy](#).

This is not an exhaustive list, but these situations may create perceived or actual conflicts of interest so please consult with a manager to discuss them:

- Hiring or working with your friends or family on Pact-related activities.
- Entering business relationships in which you, your friends or family have a financial interest.
- Assuming a professional role in another organization or other employment.
- Having romantic relationships with co-workers.

## Media Relations

Anytime an employee is approached by or wants to engage with the media – especially to address a crisis – the [Media Engagement Policy](#) must be followed to ensure that Pact's communications to external parties is conducted in a highly managed and coordinated process led by Integrated Communications. Please refer to the [Media Engagement Policy](#) for more details.

## Intellectual Property

Pact's intellectual property rights (e.g., branding, trademarks, logos, photos, know-how, materials, techniques, platforms, and copyrights) are valuable assets. They belong to Pact and neither employees nor third parties are authorized to take them for their own use. For this reason, you must protect Pact's intellectual property by making sure that we have appropriate agreements with third parties before we authorize their limited use of our intellectual property. Likewise, respect the intellectual property rights of others and don't engage in unauthorized use of their material in your work at Pact.





# Respect

*We believe in the inherent rights, freedom, dignity and equality of all people and strive to protect these rights for all Pact workers and the people we serve.*

## Harassment-free Workplace

Working in a highly pressured environment can sometimes strain your ability to maintain a collegial manner at work. Nonetheless, every Pact employee, regardless of position, is always obligated to act professionally and objectively.

Pact also will not tolerate its employees, partners, subrecipients or any other representative associated with its programs to engage in sexual harassment.

Pact prohibits harassment, bullying and sexual harassment in any form - verbal, physical or visual, as discussed more fully in our [Anti-Harassment and Anti-Discrimination Policy](#). If you believe you have been harassed by anyone at Pact, or by a Pact-related third party, we strongly encourage you to immediately report it to a Human Resources representative or [EthicsPoint](#).

## Protecting Adults and Children from Exploitation and Abuse

Pact will not tolerate its employees, or third parties associated with its programs, to engage in any form of exploitation or abuse of adults and children. Pact has no tolerance for this type of misconduct. It is our mission to help society, not to exploit or allow others to exploit our program participants and communities that we serve.

As we all know, children, women and minority populations can be extremely vulnerable to abuse and exploitation, especially in situations of poverty, crisis and conflict, and deserve higher standards of protection. Pact is committed to safeguarding them against all forms of abuse and exploitation, regardless of whether the bad actor is associated with Pact. In the course of your work at Pact, if you are aware or suspect any such conduct against a child or adult, you must report it.

Keep in mind that while we respect local cultures and laws, sometimes Pact policies may differ and may have more rigorous expectations. The requirements of our safeguarding policies are in addition to any other applicable legal requirements. For more information, please review our [Preventing Sexual Exploitation and Abuse Policy](#) and our [Child Safeguarding Policy](#).



## Combatting Trafficking in Persons

We are committed to combatting trafficking in persons. It is your obligation to respond promptly and appropriately to any allegations of trafficking incidents. We must be aware of trafficking warning signs so Pact staff and participants in Pact's programs are safe and not exposed to any threat or acts of trafficking in persons. You also need to ensure that Pact is not working with third parties who may be involved in human trafficking. For more information, view Pact's [Combatting Trafficking in Persons Policy](#).

## Confidentiality

We collect and store personal and confidential information, including health-related data, from employees and program participants around the world. It is your obligation to become familiar with Pact policies on limiting access and use of personal and confidential information.

In general, Pact avoids collecting personal and confidential information that is not necessary or required. If you do not need it, don't record it. If such information needs to be collected, it is your obligation to secure it on Pact systems and to limit access to only those who are authorized on a need-to-know basis. At times, a project or negotiation may require you to disclose confidential information to an outside party. Disclosure of that information should be on a need-to-know basis and only under a non-disclosure agreement.

## Use of Pact's Equipment

Anything you do using Pact's electronic facilities (e.g., computers, mobile devices, network) or store on our premises (e.g., proposals, presentations, reports and other documents) might be disclosed to people inside and outside the organization. Pact may be required by law or internal policy to monitor, access and disclose the contents of email, voicemail, computer files and other documents. Some examples that may require Pact to do so include protecting employees and users, maintaining the security of resources and property, or investigating suspected employee misconduct.

## Political Engagement

In return for our tax-exempt status, Pact cannot be involved in political campaign activities and as an organization, we don't do it. What does that mean for you, as an employee? You are free as an individual to engage in political activities. You simply cannot use the Pact name, Pact time or Pact resources (e.g., paper, printer ink, postage, office space) to do so. Please use your own personal time to engage in those activities. Pact supports its staff's choices to be active participants in political party, voter registration and voter protection activities. If you have any concerns or questions about your political involvement, please contact the [Ethics & Compliance Office](#).

## Use of Social Media

As an individual, you are free to use social media. But your social media activities must not interfere with work commitments, disclose confidential information about Pact or misuse the Pact brand. If you have any questions about the professional standards that govern Pact and social media, please refer to the [Social Media Handbook](#).

## Respect for the Environment

Pact is committed to being an environmentally conscious organization that operates in an environmentally sustainable way both internally in its operations and externally through its programs. This requires all Pact staff to play their part in assuring we not only comply with the guidelines set forth in the [Environmental and Social Sustainability Policy](#), but are proactive in ensuring we reduce our environmental footprint. Pact encourages staff to conserve resources and to reduce waste and greenhouse gas emissions by engaging in recycling and energy conservation both in and out of the office. Be aware of your plastic usage, your fuel consumption and your electricity usage; individual small changes can have large impacts.

Wherever possible we should lead by example, resource permitting, to create awareness of environmental sustainability of our local partners and host communities. It is important to note that the requirements of our environmental policy are in addition to any other applicable legal requirements in the countries where we operate.



# Inclusion

*Inclusion makes us stronger as an organization and amplifies our efforts.*

## Teamwork

Pact values teamwork and collaboration. We encourage you to consider the work of the organization as a whole and not just your program or your role here. As colleagues, we are all expected to help each other through challenges and to share enthusiasm for achievements. Ignore geographic and departmental boundaries and recognize that we are stronger when we can draw on the diversity and talents of all our resources.

## Diversity

Pact is a collection of many people from different countries, cultures and identities. We value that diversity of voices and perspectives. To protect that richness at Pact, you should be sensitive to personal bias and ensure that everyone has an equal opportunity to not only join Pact but to thrive and succeed while they are here.

## Equal Employment Opportunities

Employment and promotions at Pact are based solely upon individual merit and qualifications directly related to professional competence. We strictly prohibit unlawful discrimination based on sex, gender, race, color, national origin, religion, age, mental or physical disability, sexual orientation or any other characteristics protected by law. We also make all reasonable accommodations to meet our obligations under laws protecting the rights of the disabled.

## Substance Use in the Workplace

Substance abuse is incompatible with the health and safety of our employees, and we don't permit it at work. Consumption of alcohol is banned at our offices, unless pre-approved by Human Resources for certain office celebrations. Illegal drugs in our offices are strictly prohibited.

If a manager has reasonable suspicion to believe that an employee's use of drugs and/or alcohol may adversely affect the employee's job performance or the safety of the employee or others in the workplace, the manager may request an alcohol and/or drug screening. If you suffer from a substance abuse problem, please seek help from Human Resources to provide you with assistance in identifying outside resources.

## Workplace Violence

Pact does not tolerate any level of violence or threat of violence in the workplace. Under no circumstances should anyone bring a weapon to work. If you become aware of a violation of this policy, you should report it to Human Resources immediately. In case of potential violence, contact the [Director of Global Security](#) - remember that communication is key.

## Global Safety and Security

It is a top priority of Pact to protect its employees who operate all over the world. Pact considers the security of our staff and offices everyone's concern and while we provide a strong duty of care to all, we expect a duty of loyalty in return, ensuring we all act with care for others and appropriately in times of crisis.

We operate in areas where there may be a risk of unexpected violence. All offices should have a Local Incident Management Team that is capable of dealing with the localized emergencies and situations, and a set of crisis and emergency plans that should be considered a library of assistance, considerations, and protocols for various situations. All employees should be familiar with their actual or potential roles should a situation occur and the various options available.

Remember, whatever the problem, to communicate this to the [Director of Global Security](#), ensuring communication lines are open and updated regularly. If the situation becomes more serious, then Pact stands ready to bring together its Crisis Management Team to provide real-time assistance to all and help guide the office through the crisis and transition back to normality.

In all circumstances staff should take preemptive precautions if demonstrations or marches are known about, and always err on the side of caution. Whenever possible, stay well away from these known flashpoint locations. If the situation is of an immediate nature and if you are near to the scene, you should retrace steps to a place of safety well away from the threat. Immediately report to the office to ensure all others are aware of the risk location.



# Accountability

*You cannot expect others to act or change if you don't take the initiative to participate.*

## Who Must Follow the Code?

Pact expects its directors, officers and employees to know and follow the Code. Failure to do so can result in disciplinary action. While the Code is specifically written for Pact employees and Board members, we expect Pact partners, subrecipients, temporary workers and others performing work for Pact to follow the Code or their own similar code of conduct in connection with their work for us. Failure to do so can result in termination of their relationship with Pact.

## What If I Have a Question or Concern?

We have an “open door policy” at Pact. If you have a question or concern, speak up. You can contact your manager, Country Director or Chief of Party, a Senior Management Team member, Human Resources or the [Ethics & Compliance Office](#). You can also submit a question or raise a concern of a suspected violation of our Code or any other Pact policy through [EthicsPoint](#).

## Am I Protected from Retaliation?

Pact will not tolerate retaliation against any whistleblower who, in good faith, reports a concern or participates in an investigation, even if the allegation ultimately is not substantiated. Anyone, regardless of position, who engages in retaliation will be subject to disciplinary action. If you believe that someone is retaliating against you, contact Human Resources, the [Ethics & Compliance Office](#) or [EthicsPoint](#). For more information, please see the [Non-Retaliation Policy](#) (previously called the Whistleblower Protection Policy at Pact).

## How Does the Ethics & Compliance Hotline Work?

- **When to Use It**

We encourage you to use [EthicsPoint](#) when you feel uncomfortable using another channel of communication or you believe that other channels have been ineffective or unresponsive.

- **Features of the Hotline**

A third party, [EthicsPoint](#), manages the intake of reports from reporters by telephone or through the internet. You can type your complaint in English or your native language and [EthicsPoint](#) will translate the complaint to report to Pact. [EthicsPoint](#) is available 24 hours a day.

- **Confidentiality**

You have the option to submit an anonymous report. If you make a report anonymously, it is important to provide detailed information. [EthicsPoint](#) will assign you a case number. You should regularly check the site to respond to information requests from the investigation team.

We encourage you to use your name when raising a concern if you feel comfortable. Using your name allows us to follow up with you for additional information. If you choose to identify yourself when using [EthicsPoint](#), we will endeavor to keep your information confidential, sharing it only on a need-to-know basis among those directly handling or overseeing the issues you reported.

Cases that lack enough information for investigators to pursue may be closed.

- **The Process**

[The Ethics & Compliance Office](#) reviews the reports and appropriately designates an Ethics and Compliance, Human Resources or Finance lead to conduct an internal inquiry. In certain circumstances, an internal investigator from Internal Audit or an external investigator may assist Pact to investigate complex, highly sensitive or egregious reports. An investigator may follow up with the reporter for additional information to conduct an inquiry.

If a complaint is not substantiated, we will close out the matter in [EthicsPoint](#) and provide a closing update. If the complaint is substantiated, we will provide an update in [EthicsPoint](#) and then relevant Pact managers will take appropriate action on various fronts: personnel action, donor disclosures and corrective actions.

Updates may be general. We often do not provide details because we must balance your interest in knowing about our actions with the interests of the organization to conduct confidential investigations and the accused employee to keep employment matters confidential.

- **Bad Faith**

Never use the Hotline in bad faith (e.g., to file fabricated complaints for ulterior reasons). Anonymous reports made in bad faith undermine the integrity of the Hotline for everybody.

## Are There Consequences for Code Violations?

Anyone, regardless of position or tenure, who violates Pact's Code or its underlying policies may be subject to disciplinary action, including termination. The following are just some examples of misconduct that may result in disciplinary action:

**Violating the Code or Directing Others to Violate the Code**  
**Failing to Report Violations or Suspected Violations**  
**Failing to Cooperate or Otherwise Impeding an Audit or Investigation**  
**Retaliating Against Others for Raising a Concern**

In addition, violations of laws or regulations can result in legal action against you, your colleagues, Pact or its partners or suppliers that could result in:

**Fines      Debarment      Suspension      Imprisonment**

# Conclusion

To be an organization that truly values respect, integrity and inclusion, Pact must hold all staff accountable to the same standards and expectations. Your active compliance with this Code of Conduct affirms your commitment to Pact's values.

**Inclusion is fostering an environment where all people feel safe to freely participate and contribute.**

