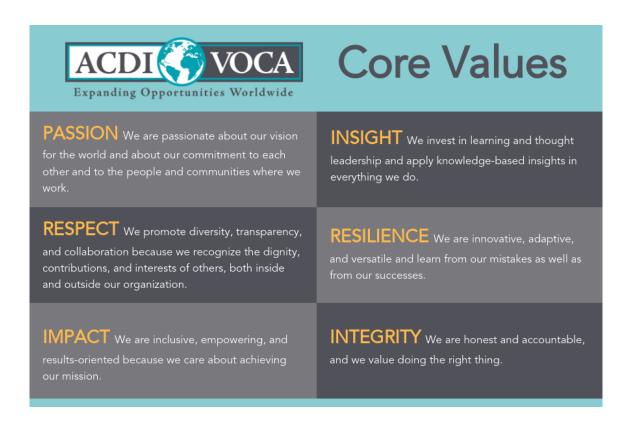
ACDI/VOCA Group Code of Conduct

ACDI/VOCA Group's Core Values are embedded in everything we do and are an integral part of our Mission: *To achieve better lives for people and communities by increasing economic prosperity and social inclusion*.



ACDI/VOCA Group's Code of Conduct provides a framework for our staff worldwide to guide the open and transparent implementation of our **Core Values** in all that we do everyday.

The **Code of Conduct** serves as an important link between our Core Values and our Corporate Policies by outlining the organization's expectations and standards of behavior.

ACDI/VOCA's **Corporate Policies**, in turn, provide a comprehensive resource for specific guidance on the proper implementation of our company-wide standards for ethical behavior.

Taken together, our **Core Values**, the **Code of Conduct**, and our **Corporate Policies** shape our commitment to comply with all applicable laws and regulations, as well as the expectations of our donors, in every one of our projects.



Ethics Reporting

Anyone who works with or interacts with ACDI/VOCA Group – not just employees – is strongly encouraged to report any ethics-related concern or suspected violation. ACDI/VOCA Group employees have are expected to understand and comply with the letter and the spirit of our policies.

Reporting a concern or suspected violation, is open to anyone who interacts with ACDI/VOCA, including, but not limited to our:

- Implementing Partners
- Subawardees
- Project Participants
- Vendors
- Suppliers
- Project Volunteers
- Donors

- Board Members
- Grantees
- Corporate Partners
- Teaming Partners
- Members of the public, in any place we operate

ACDI/VOCA Group offers multiple avenues for reporting so that individuals can choose the method that best fits their situation. No matter how an individual chooses to report an ethics-related concern—whether through our online ethics system, or in person or through e-mail—there are options for reporting that are completely anonymous.

If you <u>are not</u> an ACDI/VOCA Group employee, you may report your concerns to:

If you <u>are</u> an ACDI/VOCA Group employee, you may report your concerns to:

- The Chief of Party or Country Director
- Any ACDI/VOCA Group employee
- ACDI/VOCA Human Resources
- The ACDI/VOCA Ethics System

- The Chief of Party or Country Director
- Any ACDI/VOCA Group employee, Human Resources, your supervisor, manager, or executive management
- The ACDI/VOCA Ethics Committee The ACDI/VOCA Ethics System

If you are an ACDI/VOCA Group employee there may be times when reporting a suspected violation is not only strongly encouraged but is <u>required by law</u>. In these instances, failure to report such a violation may lead to disciplinary action, up to and including termination of employment. Some examples include:

- If you receive an ethics-related concern from someone who is NOT an ACDI/VOCA Group employee, you are required to report it.
- If you receive an ethics-related concern from an ACDI/VOCA Group employee or volunteer, you are <u>required to report</u> it. You must also respect that person's anonymity if they request it.

If you have any questions about whether the behavior you see may be a violation, or if it involves a legal requirement to report, you should immediately seek guidance from the Ethics Committee. You may contact any member of the Ethics Committee via Aviator, phone, Teams, or by using the following e-mail address:

• EthicsCommittee@acdivoca.org

The individual filing the report will be protected from retaliation for making the report by the ACDI/VOCA Whistleblower Policy, as well as Federal Law.

ACDI/VOCA will never take adverse employment action against an individual for reporting a concern or suspected violation in good faith.

Our Commitments:

Commitment to Anti-Exploitation

ACDI/VOCA Group opposes all forms of human exploitation and is committed to a policy of preventing or mitigating all forms of exploitation, including, but not limited to trafficking in

persons, sexually exploitative activity, gender-based violence, and all other forms of abusive and exploitative practices.

Key Policies and Resources:

- Anti-Exploitation Policy
- Hiring Policies
- Notice Prohibiting Recruiting Fees

Commitment to Anti-Corruption

ACDI/VOCA Group is committed to identifying and preventing all forms of bribery and corruption as an integral part of our mission. We train and educate our employees to identify the early warning signs of corruption, including conflicts of interest, and how to prevent them.

Key Policies and Resources:

- Anti-Corruption Policy
- Conflict of Interest Policy
- Subaward Policy
- Subaward Manual
- <u>Procurement Manual</u>

Commitment to a Harassment-Free Workplace

ACDI/VOCA Group is committed to preventing all forms of sexual harassment and discrimination. We expect and require that all interactions among staff, board members, project participants, clients, donors, subcontractors, vendors, or staff from these organizations will be business-like and free of bias, prejudice, and harassment.

Key Policies and Resources:

Harassment Free Workplace Policy

Commitment to Protecting Whistleblowers

ACDI/VOCA Group is committed to protecting anyone who, in good faith, reports allegations of violations of ACDI/VOCA Group policies, relevant laws, or any other concerns regarding proper legal and ethical behavior. Further, ACDI/VOCA Group will never take adverse employment action against anyone who reports any such concerns in compliance with the Whistleblower Policy.

Key Policies and Resources:

Whistleblower Policy