


Policy Level:	Level 1: Global Policy
Policy Title:	Code of Conduct
Policy Reference No.:	L1-2019-02
Effective Date:	April 15, 2019
Owner:	Michelle Guillermin, Chief Administrative Officer
Approver:	Laurie Adams, CEO

**Approved & Disseminated by:**




---

Laurie Adams  
Chief Executive Officer

## SECTION 1 - OBJECTIVE AND SCOPE

### OBJECTIVE

This policy was created to provide a comprehensive, global Code of Conduct that includes professional principles and standards of conduct based on the values of the organization.

### SCOPE

This policy applies to all Women for Women International persons; employee, Board or Advisory Board member, consultants, contractors, interns and volunteers, and others acting on behalf of WfWI, and all of its country programs, wherever located.

## SECTION 2 - POLICY

It is the policy of Women for Women International (WfWI) that we conduct our activities according to the highest ethical and professional standards. In order to fulfill the organization's mission and vision and to reaffirm WfWI's core values, the WfWI Board of Directors and the Global Leadership Team have adopted this Code of Conduct as a reminder of certain standards of conduct that staff must meet while working for Women for Women International.

## SECTION 3 - PROCEDURE

### INTRODUCTION

#### **Our Mission**

In countries affected by conflict and war, Women for Women International supports the most marginalized women to earn and save money, improve health and well-being, influence decisions in their home and community, and connect to networks for support. By utilizing skills, knowledge, and resources, she is able to create sustainable change for herself, her family, and community.

#### **Our Vision**

To create a world in which women determine the course of their lives and reach their full potential.

#### **Our Integrity**

It is the policy of Women for Women International that we conduct our activities according to the highest ethical and professional standards. In order to fulfill the Organization's mission and vision and to reaffirm WfWI's core values, the WfWI Board of Directors and the Global Leadership Team (GLT) have adopted this Code of Conduct, to which WfWI persons - every employee, Board or Advisory Board member, consultants, interns and volunteers, and others acting on behalf of WfWI, and all of its Country Programs, wherever located, must adhere.

Failure to conduct activity in keeping with this Code of Conduct is grounds for immediate termination of employment or other relationships with Women for Women International. All Human Resource (HR) Managers/Officers are responsible for assisting employees with any issues arising under the Code of Conduct. If a local HR Manager/Officer is not available or if an employee believes that it would not be appropriate to discuss an issue locally, the question or concern may be reported to the Global Manager of HR or the Chief Administrative Officer in Washington, D.C. The Whistleblower Facility may also be used to confidentially report issues.

#### **Our Policy**

This Code of Conduct describes the ethical standards expected of all those associated with Women for Women International and its Country Programs. Details as to specific requirements and policies are found in the local Women for Women International Employee Manual, and in other WfWI policies. This Code of Conduct does not constitute, nor should it be considered, a contract or commitment of employment or continued employment.

It is understood that some words and phrases in a Code of Conduct are subject to varying interpretations, and that any ethical principle may conflict with other ethical principles in specific situations. Questions related to ethical conflicts can best be answered by thoughtful consideration of fundamental principles, in addition to detailed regulations.

Staff members have a responsibility to help ensure that the Organization maintains the public's trust. Much of our success is measured by the level of confidence that the public places in the integrity of our staff.

This Code of Conduct identifies 12 Principles for which each employee should take responsibility. It contains many, but not all, issues our staff is likely to face.

### *Policy: Key Principles*

*This section outlines the key principles and ethical considerations which underpin this Code of Conduct.*

### *Procedures: The Principles in Practice*

*This section outlines the way the key principles are to be put into practice in terms of day-to-day professional conduct. Not all of the key principles are addressed in this section.*

# KEY PRINCIPLES

## 1. General Principles

- All staff members are expected to adhere to the highest standards of personal conduct in keeping with the responsibilities and policies of WfWI. Staff members must adhere to the highest standards of conduct in order to avoid even the appearance of conflicts of interest or situations that may cause embarrassment to themselves, their colleagues, the organization, or their stakeholders.
- Each employee shall display good judgment, diplomacy and courtesy in relations with members of the Women for Women International Board of Directors, committees and workgroups, member organizations, the public and other employees. Employees shall abide by the highest standards of personal and professional ethics. Moreover, employees shall treat others with respect and dignity.
- All clients and staff have the right to fair and just treatment irrespective of race, color, language, political or religious conviction, age, education, wealth, sexual orientation, national origin or culture. Discrimination, harassment and bullying are against WfWI policy, and constitute unacceptable behavior. The Organization will take disciplinary action if a staff member is found to have discriminated against, harassed or bullied a client or another staff member.

## 2. Sexual Exploitation and Abuse

- Sexual Exploitation and Abuse by WfWI staff and representatives constitute acts of gross misconduct and are therefore grounds for termination of employment or professional relationship;
- Sexual activity with children (persons under the age of 18) is prohibited, regardless of the age of majority or age of consent locally. Mistaken belief in the age of a child is not a defense
- Sexual relationships between WfWI persons and the women we serve are prohibited since they are based on inherently unequal power dynamics. Such relationships undermine the credibility and integrity of our work.
- Exchange of money, employment, goods or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior, is prohibited. This includes exchange of assistance that is provided to the people we serve;
- If a WfWI staff or representative develops concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether in the same organization or not, s/he must report such concerns immediately to WfWI management directly or through the Whistleblower hotline. Every concern will be addressed in a timely, robust and survivor centric manner.
- WfWI staff and representatives are obliged to create and maintain an environment that prevents sexual exploitation and abuse and promotes the implementation of our code of conduct. Managers at all levels have particular responsibilities to support and develop systems that maintain this environment.

## 3. Organizational Property

Part of staff's responsibility to the organization is to protect and conserve WfWI property and use it for proper purposes.

#### 4. **Confidential Information**

Staff may have access to information that is not generally available to the public or that is considered confidential. This may include information related to both current and former participants, supporters, and employees, or to third parties with which WfWI is currently associated or has been associated in the past. It is imperative never to discuss such information with anyone unless authorized by a supervisor. Staff may not use insider information for any purpose other than WfWI activities. If a staff member leaves WfWI's employment, s/he must continue to keep this information confidential.

#### 5. **Conflict of Interest**

- Women for Women International (WfWI) members of the Board of Directors, employees or contractors shall not engage in conduct resulting in a potential conflict of interest. An employee is in a potential conflict of interest when any action by WfWI, whether isolated, recurring or continuous, is to the direct financial advantage of the employee, the employee's spouse, parent, child or other relative.
- All real or apparent conflicts of interest should be immediately disclosed to management. If a real or apparent conflict of interest is involved, no employee shall participate in the selection, final choice, or management of a contract covered by donor funds, including federal or nonfederal funds. Such a conflict of interest would arise when any employee or any member of his/her family, his/her partner, or an organization that employs or is about to employ any of the parties indicated herein, has a financial or other interest in the firm/organization selected for a final contract.
- WfWI employees shall neither solicit nor accept gratuities, favors, or anything of monetary value from contractors, partners, supporters, or parties of contractors. Failure to comply with this policy may result in disciplinary action, including dismissal.
- Some exceptions to these rules are listed below in the Procedures section; for example, permitting staff members to accept meals and refreshments that are provided as part of a widely attended business meeting.

#### 6. **Outside Activities**

Staff activities outside the Organization should not harm WfWI's reputation or interfere with her/his WfWI duties. In addition, before engaging in any outside activity for which a staff member will be paid, s/he should notify her or his supervisor to ensure that there is no conflict of interest (see Principle 5 above). In some cases, prior approval may be required.

#### 7. **Anti-Fraud**

All employees have a responsibility to report to their supervisor actual, attempts, or conspiracies to commit bribery, kickbacks, fraud, or theft. See WfWI's [Whistleblower Policy](#) for our global directive on reporting illegal or unethical behavior.

## 8. **Anti-Terrorism**

WfWI employees must not provide material or financial support to known terrorists. WfWI has developed and maintains terror list checking procedures for its global network WfWI employees must be informed of and follow these policies and procedures to ensure that the organization is not aiding terrorism.

## 9. **Use of Position**

Staff may not use her or his position at the organization, either directly or indirectly, for private gain. This includes using her or his title or position to endorse products, services, or enterprises other than the organization's services. Suppliers or vendors to the organization must not be chosen on the basis of a personal relationship.

## 10. **Relationships with Competitors**

Staff are expected to abstain from making or promoting allegations that call into question the professional conduct of WWI's competitors.

## 11. **Post-Employment Activities**

- Staff may not participate in any WfWI business that will affect the financial interests of any organization or person with whom s/he is seeking employment or has an arrangement for future employment.
- If a former staff member of the organization contacts a staff member about a WfWI matter in which he or she was involved while at the organization, staff may not discuss the matter unless authorized to do so by WfWI management.
- Confidential information (in electronic, written, oral or other form) must not leave the organization's premises once employment with WWI ends. Staff must leave all WfWI documents, files, computer disks, reports and records containing any WfWI or non-public information — and all copies of such information — upon his or her separation from the organization.

## 12. **Reporting violations; Disciplinary Action**

It is important that the public have confidence in the honesty and integrity of all WfWI staff members. Therefore, we expect staff members to uphold and promote the principles of this code. Furthermore, we encourage staff to report violations of the Code of Conduct to either the Chief Administrative Officer, or the Chief Executive Officer. Please note: Violations that involve corruption, fraud, or theft should be reported via WfWI's [Whistleblower Policy](#). If a staff member violates any provision of the organization's Code of Conduct, s/he will be subject to disciplinary action that can include dismissal from the organization.

# PRINCIPLES IN PRACTICE

## 1. General Principles

### • Cultural Diversity

- WfWI is committed to the cultivation of responsive and responsible links with the wider community, emphasizing service, social justice and ethical behavior.
- This code will be guided by the following principles:
  - All the people we serve and staff have the right to fair and just treatment irrespective of race, color, language, political or religious conviction, age, education, wealth, sexual orientation, national origin or culture.
  - All staff have the right to work in an environment in which their cultural identity is recognized and respected.
  - All staff have a responsibility to become more knowledgeable of, and sensitive to, other cultures in our culturally diverse Organization.

### • Discrimination and Harassment

Discrimination and harassment, including but not limited to sexual harassment, may occur between staff or between clients and staff. It may be intentional or unintentional.

- WfWI does not have the right to intervene in personal relationships. It does, however, have a proper concern where discrimination or harassment:
  - Creates an intimidating, hostile or offensive work environment;
  - Adversely affects an individual's performance at work;
  - Results in resignation or unfair dismissal from the Organization;
  - And/or reflects on the integrity and standing of WfWI.
- As well as prohibiting the direct discrimination or harassment of one individual by another, the organization considers any person who causes, instructs, and induces, aides or permits another person to engage in discrimination or harassment to have also committed the act in question and he or she shall be penalized accordingly. It is the responsibility of all staff members to ensure that WfWI is free from discrimination and harassment.
- WfWI has a zero tolerance approach toward harassment and is committed to taking all action necessary to prevent, and where reported, resolve incidents of harassment and discrimination.

### ○ Organizational Property

- WfWI property includes, but is not limited to:
  - All physical property of the Organization, whether leased or owned by WfWI.
  - All records containing supporter accounts, and any other records and books in WfWI's possession.
  - Personnel files and all other staff-related records.
  - All studies, advertising or promotional materials, supporter lists, logs or reports or any other forms, that are in WfWI's possession.
  - All proprietary software.

- Personal computers, the shared file servers, email addresses, internet access and other computer resources for employees are productivity tools, provided to staff at a significant cost. That means we expect staff to use internet and network access primarily for work related purposes, i.e., to communicate with employees, work related partners, state and federal agencies and providers, to research relevant topics and obtain useful information.
- The personal computer and all other equipment provided to staff remains the property of Women for Women International at all times. Staff are expected to make all reasonable efforts to safeguard this property when traveling outside the office environment. Staff computers should be used for Women for Women International related business only. Women for Women International accepts no responsibility for any personal files stored on a staff member's computer. There should be no expectation of privacy vis-a-vis personal computers and other equipment provided to employees in the course of business.
- Electronic Communications Policy
  - The purpose of this policy is to ensure that these communication tools are used appropriately and that information assets are protected from loss or misuse.
  - Electronic communication tools and all messages/files generated on or handled by such tools are the property of WfWI. The Organization reserves the right to monitor electronic communication tool use and to access and disclose the content of employee messages, including attached files. By using the communication tools of the organization, employees consent to the interception and disclosure of any stored electronic files.
  - Email addresses are intended for business purposes. Staff are encouraged to use a separate account for personal emails.
  - Employees shall not use the organization's electronic communication tools for personal gain (e.g. running a business) or for any illegal or criminal activity. Unnecessary or unauthorized email and Internet usage causes network and server congestion. It slows other users, takes away from work time, consumes supplies, and ties up printers and other shared resources. Unlawful or inappropriate email or Internet usage may also garner negative publicity for Women for Women International and expose the organization to significant legal liabilities.
  - Failure to comply with any requirement of this Electronic Communications Policy will result in disciplinary action, up to and including termination of employment.
- Copyrights
  - The organization complies with applicable restrictions on the use of copyrighted and other protected proprietary material, including software.
  - If an employee violates copyright or licensing restrictions and the organization makes payment to a copyright holder or incurs other expenses as a result of such a violation, the employee responsible may be required to reimburse the organization for the expenses incurred and the employee will also be subject to disciplinary action.
- Use of WfWI Telephones (Mobile and Fixed Lines)
  - Office telephones are provided for business use; personal calls using office telephones are



discouraged. It is recognized that employees will from time to time need to receive or place personal calls. Such calls, however, should 1) be limited to only those that are essential, 2) be of short duration and 3) if possible, be scheduled during lunch hours or breaks. When long-distance charges are incurred, employees will reimburse the Organization for the incurred expenses.

- **Care of WfWI Facilities**
  - Any acts of vandalizing, defacing, or otherwise damaging organizational facilities, equipment or furnishings at any WfWI location or unauthorized removal of WfWI property will be cause for disciplinary action.
  - All WfWI employees are expected to contribute to the maintenance of a clean work environment. Each employee is responsible for seeing that desks, tables, files and all surrounding work areas are kept as neat as possible at all times and all work materials are stored appropriately.
- **Confidential Information**
  - "Confidential Information" refers to all non-public information, in any form, emanating at any time from Women for Women International, its Country Offices, any individual served by Women for Women International, donor or any other person that relates in any way to the business or operations or financial information of Women for Women International, its Country Offices, or any person we serve or donor. Confidential Information includes, but is not limited to: business forecasts; financial data; sales and marketing information; business information; budgets, research and development information; design details and specifications; fundraising; grants; algorithms; software programs; inventions, trade secrets; past, existing or perspective donor lists and/or names or addresses; contract negotiations; product and service prices; employee relations matters; strategies and business plans; professional contracts; training manuals; employee manual; designs; drawings; systems; procedures; vendor information; or any other compilation of confidential information, whether oral, written, electronic, or maintained in any other form.
  - When the employee leaves his/her work—station at the end of the day or leaves it during the day, he/she must make sure that no confidential information is left at the work-place or another easily accessible place. All documents containing confidential information should be locked away, and the computer has to be switched off or code protected.
  - Employees shall provide confidential information only with the proper authorizations.
  - The responsibility not to release confidential information shall remain in force even after the dismissal of the employee.
- **Conflict of Interest**
  - It is inevitable and desirable that staff will have individual partner and personal relationships with the organization's supporters, vendors and others who work with the organization even though such individual relationships are not connected with the organization's activities. This policy is not intended to discourage such relationships. Any such relationship should be on customary terms and for proper and usual purposes. However, staff should not solicit any individual favors in the name of the organization.
  - **Receiving Gifts**
    - All WfWI Persons should avoid accepting gifts, services or other items that would potentially compromise objectivity in decision-making, particularly with a business partner or vendor. Gifts of nominal value, or meals and social invitations, which are in

line with WfWI business ethics, may be accepted where necessary for ordinary business relationships. Any question about the appropriateness of accepting a gift or invitation should be referred to a supervisor or local HR representative.

- The following transactions are permitted and shall be considered an exception to the general prohibition against acceptance of items of value:
  - Acceptance of meals and/or refreshments, all of reasonable value, in the course of a meeting or other occasion, the purpose of which is to hold bona fide organizational discussions or to foster partner relations, provided that the expense would be paid for by the organization as a reasonable business expense if not paid for by another party.
  - Acceptance of advertising or promotional material of reasonable value such as pens, pencils, note pads, key chains, calendars or similar items.
- Necessarily, the applications of the policy stated herein will require good judgment and common sense. If a staff member encounters a situation in which s/he is not sure of her or his obligations, s/he should consult with her or his supervisor or local HR representative.
- If a staff member is offered or receives something of value beyond what is authorized herein, s/he should report the fact in writing to her or his supervisor or local HR representative, in accordance with the reporting directions herein, providing all relevant details.
- Any WfWI employee found to be receiving, accepting or condoning a bribe, kickback, or other unlawful payment, or attempting to initiate such activities, will be subject to termination and possible criminal proceedings against them.

■ Giving Gifts

- Gifts or entertainment may not be offered if they could be perceived as bribery or as an exchange for an official or business favor.
- It is WfWI policy to abide by the provisions of the U.S. Foreign Corrupt Practices Act (FCPA), which prohibits bribes, "kickbacks," or other payments to foreign officials. WfWI does not allow expediting or facilitating payments, even for routine or non-discretionary activities, except with the prior approval of the CEO following advice of legal counsel in compliance with the law.

■ Hiring Relatives of Employees

- Women for Women International seeks to avoid situations where the perception or possibility of favoritism or conflicts of interest exist, such as the hiring, transfer or promotion of relatives or individuals involved in a romantic relationship.
- Therefore, Women for Women International prohibits an employee from being in supervisory or other chain of command position with another relative (including but not limited to immediate family, grandparents, cousins, aunts, uncles and inlaws) or person with whom she or he is involved in a romantic relationship.
- Women for Women International also does not allow an employee to be in a position in which she or he otherwise controls the terms or conditions of work of a relative of an individual with whom she or he is involved in a romantic relationship.

- For example, if two colleagues working together in the same department are married, neither will be hired or promoted into a position that would place one person in a supervisory relationship with other person. On the other hand, if two persons should marry while both are employed by Women for Women International in different departments and neither exerts any control over the working conditions of the other, they may continue their employment.
- Should a situation arise that appears to be covered by this policy, the affected employees should immediately notify their manager(s). Each situation will be handled on a confidential case-by-case basis in the best interests of the organization. This policy affects all aspects of promotion and hiring, including full- and part-time employment, contractual relationships, interns and summer employment.

○ **Outside Activities**

▪ **Public Speaking and Publishing**

The only employees or officials who are duly authorized to speak to the media, to analysts or in public gatherings on behalf of Women for Women International or who may speak or write in the name of Women for Women International to any newsgroup, media or chat room are the Board of Directors, CEO, Vice President of Marketing, Development & Communications, all others require prior approval from an authorized speaker.

- Those persons authorized to speak or write in the name of Women for Women International shall not solicit, accept, or agree to accept honorarium in their own name, for services they would not have been asked to provide but for their official position or duties with the organization. This prohibition includes a request for or acceptance of payment made to a third party if made in exchange for such services.

▪ **External Communication**

WfWI operating policy requires review and approval of public communications that might be perceived as representing the views of WfWI in order to ensure that public statements do not reflect adversely on WfWI or its programs. Therefore, all external communication, including press releases, websites, public statements, etc., are to be authorized by the individual within the organization charged with reviewing and approving communications before being released.

- Whenever an employee participates in a newsgroup or chat, the employee must refrain from any unauthorized political advocacy and must refrain from the unauthorized endorsement or appearance of endorsement by the organization of any commercial product or service not sold or serviced by this organization and/or its country offices.

▪ **Political Activities**

Staff may undertake public service that does not raise questions about the independent character of WfWI, for example, service on a board of education, a charitable organization, or a university board, if the office is not elected under a party label. It is important that the organization not be viewed as taking part in or sponsoring political campaigns or partisan activities, so staff may not engage in political activity while on duty or on WfWI premises, and her or his association with the organization must not be publicized in connection with any political activities. Staff may not run for political office or solicit or accept any political contributions on behalf of any candidate, party, or political organization.

▪ **Board Memberships**

Board memberships at other organizations shall not be considered to be at the request of the organization unless approved by the CEO, or by the appropriate Board of Directors. WfWI employees may serve on boards of other organizations as long as there is no perceived or actual conflict of interest with WfWI. WfWI encourages employees to disclose their membership on an outside board with the CEO to ensure that their participation is appropriate.

○ **Anti-Fraud Compliance**

- Fraud is an intentional act of deception, misrepresentation, impropriety, or concealment to gain something of value at the detriment of another. Fraudulent acts can include forgery or alteration of any document or policy; falsifying time sheets or documents; abuse of sick time; theft; billing for services not performed and other irregular billing practices; inflating charges for services or products; false claims; and any other improprieties
- Country Directors and managers are responsible for knowing what types of fraud can occur and for being alert to symptoms of wrongdoing. Upon discovery of any potential wrongdoing, Country Directors are responsible for immediately notifying the WfWI CEO or CAO.
- It is the responsibility of every WfWI employee, agent, partner, or representative to:
  - Comply with WfWI procedures and the laws of the United States and the foreign country in which WfWI conducts business;
  - Refrain from making any corrupt payment, regardless of amount, to foreign government or political party officials either directly or indirectly;
  - Refrain from using WfWI assets for any illegal or unethical purpose; iv. Refrain from creating or maintaining secret funds or assets for any purpose;
  - Adhere to Generally Accepted Accounting Principles (GAAP) and WfWI accounting policies and internal control procedures;
  - Refrain from making false or misleading entries in WfWI records or making any payment on behalf of WfWI without adequate supporting documentation; and
  - Report all violations of WfWI financial and accounting policies to the Chief Administrative Officer or CEO.
- Any employee will be subject to immediate termination and criminal prosecution if found to be engaged in, or conspiring to commit, fraud or theft of assets of WfWI or its participants, or attempting to engage in fraud or theft.

○ **Reporting Violations; Disciplinary Actions**

- General questions regarding this Code of Conduct may be directed to the local HR manager, direct supervisor, or the Chief Administrative Officer.

○ **Employee Certification and Disclosure**

- Signing the Employee Code of Conduct certification form — See Appendix I
  - The Code is an integral part of the employment agreement. When they are hired by the organization, employees must sign a form certifying that:
    - They have read the Organization's Code of Conduct.
    - It is fully understood.
    - They have complied, and will continue to comply, with its requirements.
    - They are not aware of any violation of policy by any other person or party where such violation has not been properly disclosed.

- At the beginning of each calendar year, but no later than the 15<sup>th</sup> of January, each employee must again sign a certification form to reaffirm compliance with the Code of Conduct.
- The HR Department is responsible for collection of signatures from the employees on the Employee Certification Form.
- **Signing the Non-Disclosure and Confidentiality Agreement — See Appendix II**
  - When hired by the organization, all employees must agree to and sign a form acknowledging that they will preserve the confidentiality of all confidential Information (as defined above in Section 3).
- **Completing required disclosure forms — See Appendix III**
  - Each employee must disclose any interests, indebtedness, or activities involving another organization that may result in a conflict of interest between Women for Women International and that company or individual.
  - When they are hired by the organization, all employees must complete and sign a form disclosing the following information about themselves as well as about immediate family members:
    - Information on entities in which the employee or an immediate family member has a financial interest
    - iAffiliations or employment with outside organizations
  - If a situation that causes a potential conflict of interest cannot be avoided, the employee must report the situation immediately to his/her immediate supervisor.
  - Any employee planning to accept a directorship of another organization, with the exception of charitable and non-profit organizations, must gain the approval of management prior to doing so.

SECTION 4 - APPENDIXES

# APPENDIX I: EMPLOYEE CERTIFICATION FORM – CODE OF CONDUCT

## Employee Code of Conduct Certification

I \_\_\_\_\_ verify that I have been provided a copy of, or provided instructions to access electronically, the Code of Conduct, with the effective date April 15, 2019, and reference # LI-2019-02. I further confirm that:

- I have read and understand all the content and terms within the Code of Conduct;
- I am not in violation of any terms within the Code of Conduct;
- I am not aware of any other parties which are in violation of any terms within the Code of Conduct;
- I agree to be bound by the terms within the Code of Conduct.

I further acknowledge that should I have any questions or require explanation or interpretation of any of the Code of Conduct contents, I am to seek guidance from the policy owner or the policy approver.

\_\_\_\_\_  
Print Name

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

## APPENDIX II: EMPLOYEE CONFIDENTIALITY AGREEMENT

---

### NON-DISCLOSURE AND CONFIDENTIALITY POLICY

I, \_\_\_\_\_, agree to preserve the confidentiality of all Confidential Information (as defined below) and all physical and non-physical forms of that information. In particular, I agree to not disclose or disseminate any Confidential Information to any third party, including employees, participants, donors, sponsors, volunteers and interns, consultants or contractors of independent contractors without a need to know and prior approval of Women for Women International ("WfWI"); to use any Confidential Information for my own benefit or for the benefit of any third party, or in any way that would be detrimental to WfWI business; remove any Confidential Information from the premises without a valid business purpose; or reproduce any Confidential Information in any form, except as is necessary to perform my duties or responsibilities on behalf of WfWI.

"Confidential Information" refers to all non-public information, in any form, emanating at any time from WfWI, its Country Offices or affiliates, or any client, donor or any other person, and that relates in any way to the business or operations of WfWI, its Country Offices or affiliates, or any client. Confidential Information includes, but is not limited to: business forecasts; financial data; sales and marketing information; business information; budgets, research and development information; design details and specifications; fundraising information; grants; algorithms; software programs; inventions, trade secrets; past, existing or prospective donor lists, names or addresses; contract negotiations; product and service prices; employee relations matters; strategies and business plans; contracts; training manuals; employee manuals; designs; drawings; systems; procedures; vendor information; or any other compilation of confidential information, whether oral, written, electronic, or maintained in any other form.

Any breach of confidentiality, regardless of when it is discovered, is considered a serious act and will result in disciplinary, legal or other action.

---

### NON-DISCLOSURE AND CONFIDENTIALITY COMMITMENT

I have read the above Non-Disclosure and Confidentiality Policy ("Policy"), and understand the seriousness of any breach. I understand that I must adhere strictly to this Policy.

I further understand that this Policy applies to any breach of confidentiality and that I must safeguard Confidential Information at all times.

I will observe this Policy and understand that any breach will result in disciplinary, legal or other action.

---

\_\_\_\_\_  
Name (Print Name)

\_\_\_\_\_  
Title

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date



## APPENDIX III: EMPLOYEE CERTIFICATION FORM - SAFEGUADING

### Employee Certification – Safeguarding Vulnerable People

I \_\_\_\_\_ verify that I have been provided a copy of, or provided instructions to access electronically, the Safeguarding Policy, with the effective date April 15, 2019, and reference # LI-2019-01. I further confirm that:

- I have read the Safeguarding Policy ("Policy"), and understand the seriousness of any breach. I understand that I must adhere strictly to this Policy.
- I further understand that this Policy applies to any act of exploitation or abuse and that I must observe this Policy at all times.
- I will observe this Policy and understand that any breach will result in disciplinary, legal or other action.

I further acknowledge that should I have any questions or require explanation or interpretation of any of the Safeguarding Policy contents, I am to seek guidance from the policy owner or the policy approver.

\_\_\_\_\_  
Print Name

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

## APPENDIX IV: EMPLOYEE DISCLOSURE FORM – CONFLICT OF INTEREST

I hereby confirm that I have received a copy of Women for Women International's Conflict of Interest Policy (INCLUDED IN THE CODE OF CONDUCT), have read and understand the Policy, and agree to comply with the Policy.

I further understand that Women for Women International is a charitable corporation and that, in order to maintain its federal tax exemption, it must engage primarily in activities which accomplish one or more of its tax-exempt purposes.

Either I or a member of my immediate family have a potential or existing ownership or investment interest in the following entities or receive or have the potential to receive direct or indirect remuneration, as well as any gift or favor not insubstantial in value from the following entities.

---

---

---

The term "relationship" means any relation with a person or organization, whether financial, employment, or fiduciary. The term "immediate family/" means spouse, parent, child, or other individual living in the same household.

I understand that I am under a continuing obligation to make full disclosure to the Women for Women International Board of Directors of all situations involving either actual or potential conflicts of interest, whenever such situations may arise, including but not limited to:

- a. Engaging in any financial, business, or other relationships with any person or organization currently or potentially engaged in any transaction, contract or other legal arrangement with Women for Women International.
- b. Accepting, in any form whatsoever, any remuneration, compensation, or gift from any person or organization currently or potentially engaged in any transaction, contract or other legal arrangement with Women for Women International.
- c. Failing to disclose any similar relationships or actions by an immediate family member.

Name: \_\_\_\_\_

Title: \_\_\_\_\_

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

## APPENDIX V: DEFINITIONS

Word/Term	Definition
Code of Conduct	A set of conventional principles and expectations that are considered binding on any person who is a member of a particular group.
Confidential Information	Refers to all non-public information, in any form, emanating at any time from WfWI, its Country Offices or affiliates, or any client, donor or any other person, and that relates in any way to the business or operations of WfWI, its Country Offices or affiliates, or any client.
Fraud	An intentional act of deception, misrepresentation, impropriety, or concealment to gain something of value at the detriment of another.

## APPENDIX VI: REGULATORY CONTEXT

U.S. Foreign Corrupt Practices Act     <http://www.fcpa.us/>

## APPENDIX VII: SUPPORTING DOCUMENTATION

### Forms and Records Management

Form	Retention Time	Retention Location
Employee Certification Form	In conjunction with WfWI's Document Retention policy	HR Confidential Files
Employee Confidentiality Agreement	In conjunction with WfWI's Document Retention policy	HR Confidential Files
Employee Disclosure Form	In conjunction with WfWI's Document Retention policy	HR Confidential Files

Name	Location	Document Type
HQ Employment Manual	HR Intranet Page	Policy Manual
Whistle-blower Policy	Policy Intranet Page	Policy

