



Global Code of Conduct and Commitment to Safeguarding

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PADF Global Code of Conduct

The Pan American Development Foundation (PADF) seeks to create a just, peaceful, and prosperous hemisphere where every person has the opportunity to thrive. We work with vulnerable people across the hemisphere to tackle some of our region's greatest development challenges. We partner with, empower, and enable civil society, governments, and the private sector for the greater good of the people of Latin America and the Caribbean.

PADF's Global Code of Conduct is a clear set of standards for the organization's business conduct. It provides the ethical and behavioral framework on which we base our decisions every day. The PADF Global Code of Conduct is expressed in the five principal values **H.E.A.R.T.** and implemented through the policies below, applies to all employees, the board of directors, consultants, authorized representatives, and all others acting on PADF's behalf. PADF requires everyone who represents its interest to observe all U.S. laws and regulations and the laws of the countries in which they are working or traveling while on PADF business. Individuals are accountable for their actions. Violations of PADF's standards could result in disciplinary or corrective action, up to and including termination of employment, legal action, or both.



Important: An employee who discovers or is made aware of any potentially unlawful or unethical activity related to PADF's projects, business practices, or activities should report it to their supervisor, project director, Director of Talent Management, or country Talent Management representative using the reporting process detailed below. Reports may be made directly or anonymously and will be managed and responded to promptly. PADF prohibits retaliation against anyone who reports a concern or cooperates in an investigation.

Commitment to Safeguarding Purpose and Scope of PADF Safeguarding Framework

The purpose of this [Safeguarding Framework](#) is to describe the Pan American Development Foundation's (PADF) commitments to safeguard those working in or with our organization as well as those whom we serve. Our commitments to safeguarding enable us to meet our organizational goals and objectives.

Safeguarding refers to preventing and responding to harm caused by our organization to the people working in the organization, and the people whom we serve. The likelihood of exploitation and/or abuse increases when individuals are in a vulnerable situation and where unequal power dynamics exist. PADF'S commitment to safeguarding includes protecting employees from harm and inappropriate behavior, including discrimination, bullying, and/or harassment in any form, and preventing and responding to harm caused by our organization to the people we serve, including sexual exploitation and abuse and sexual harassment.

PADF takes an intersectional approach to safeguarding, recognizing that everyone has varying degrees of power and privilege in different circumstances based on their intersecting identities and that people may experience, or be at risk of, different types of abuse based on these identities. PADF believes in advancing gender equality throughout the organization. PADF leadership and programs reflect this core value.

The Global Code of Conduct is anchored in our values and beliefs and underpins everything we do. It includes policy commitments on Anti-discrimination, Anti-harassment, Anti-Bullying, Whistleblowing, PSEAH, Anti-Trafficking and Safeguarding of Children and Communities, and other aspects of conduct that contribute to creating a safe environment including ensuring our work online is as safe as our work in person.

Safeguarding Principles

PADF's Principles for Safeguarding are:

- **Zero tolerance.** PADF upholds the zero-tolerance principle towards inaction on reports and concerns regarding abuse or harm of those working in the organization and those whom we serve.
- **Accountability.** PADF accepts responsibility for its actions and builds a sense of accountability between employees so that potentially poor or abusive behavior can be challenged.
- **Respect.** The organization fosters cooperation, collegiality, empathy, ¹and teamwork, working together towards a culture of openness that enables issues and concerns about safeguarding to be raised and discussed.
- **Survivor²/community-centered approach.** PADF puts the rights, dignity, needs, and wants of survivors and victims of harm and abuse at the center so they get the assistance and support they need respecting confidentiality and avoiding potential re-victimization of the survivor.
- **Mandatory reporting.** Where a PADF employee develops concerns or suspicions regarding harm or abuse by a colleague or partner staff member they must report such concerns.

¹ 2021_Annual Report English: https://www.padf.org/wp-content/uploads/2022/06/2021_Annual-Report_English.pdf

² Protection from Sexual Exploitation and Abuse Statement by the Inter-Agency Standing Committee (IASC) Principals 2015. Note that some people who have experienced harm prefer not to refer to themselves as survivors. The term used should be the choice of the affected individual.

Policies under the PADF Safeguarding Framework

Anti-harassment, Anti-discrimination and Anti-bullying Policy

The purpose of this policy is to ensure that PADF provides a safe working environment that is free from any form of intimidation, oppression, and exploitation and should be free from all forms of bullying and discrimination, harassment, or bullying because of race, ethnicity, color, religion, sex (including pregnancy, childbirth, related medical conditions, breastfeeding, and reproductive health decisions), age, disability, national origin, ancestry, sexual orientation, marital status, personal appearance, citizenship status, family responsibilities, gender identity or expression, genetic information, matriculation (enrolled in a college, university, an adult education program, or a secondary education program), political affiliation, veteran status, credit information, status as a victim or family member of a victim of domestic violence, a sexual offense, or stalking, or any other characteristic protected by federal, state, and local law ("Protected Category").

This policy aims to:

- Foster a positive culture and promote an enabling and inclusive environment where everyone is always treated fairly with dignity and respect.
- Raise awareness of the different types of unacceptable behavior in the workplace.
- Increase understanding of employee rights, roles, and responsibilities in preventing such unacceptable behavior from occurring in the first instance.
- Ensure that occurrences of unacceptable behavior are taken seriously and dealt with promptly and with due care and sensitivity.

This policy applies to all PADF Employees and Others in all locations, both during and outside of normal working hours.

- Employees: Full-time, part-time, international, and national employees engaged by PADF in any location as well as advisers, consultants, interns, volunteers, Board members, and trustees engaged by PADF.
- Others: Employees in partner agencies, sub-grantees or sub-awardees; and any other individuals, groups, or organizations that have a formal or contractual (but not employment) relationship to PADF.
- This policy covers specific forms of harm, or workplace violence, that might take place, or be experienced, within the workplace. This includes discrimination, bullying, and harassment.

Roles and Responsibilities

All Employees and Others

- Employees must recognize and appreciate different working styles and perspectives.
- Employees must contribute to open communication and information sharing.

Management

- Management will allocate duties fairly, setting clear expectations and realistic deadlines.
- Management will ensure employees have the knowledge and skills to perform their roles.
- Management will provide constructive, regular, and reasonable performance guidance.
- Management will help employees resolve complaints informally where appropriate.
- Management will provide access to flexible working arrangements and encourage work-life balance.
- Management will foster teamwork and reward collaborative behavior.

Standards of Behavior

PADF is committed to maintaining a high standard of conduct in the workplace, to create a work environment free from harm defined in this policy. PADF employees are responsible for maintaining a high standard of behavior/conduct in the workplace and must refrain from engaging in behaviors that are defined as harm at work, at work-related social functions, on or off the organization's premises, and during work-related travel. Behaviors which are prohibited include but are not limited to:

- Derogatory remarks, slurs, accusations, or negative stereotyping and microaggressions, using a person as the butt of jokes; abusive and offensive remarks, or depicting harassers as victims or victims as complainers.
- Unwelcome comments about appearance.
- Graphic materials, derogatory posters, cartoons, or drawings; whether physical or online
- Communicating a wish, intent, or threat to hurt employees or visitors of PADF all forms of physical assault which

entails inflicting bodily harm on any person at any time and in any place or damaging a person's work area or property; physical interference with normal work or movement which is directed at an individual.

- Arguing frequently with, being belligerent or derogatory towards, or repeatedly swearing at; or making or sending derogatory, violent, intimidating, or inappropriately aggressive written, verbal, social media, or visual communications to employees

Reporting

It is the duty and the responsibility of all employees and others engaged by PADF to report any suspicions or incidences of discrimination, harassment, or bullying. This is a keyway to challenge inappropriate behaviors and help create a safe work environment.

PADF is committed to creating a working culture in which everyone feels safe to raise a concern. If an employee does not report an incident or suspicion, they will be in breach of the Code of Conduct and may face disciplinary proceedings. This does not apply to survivors who can decide if, when, and how to report.

All employees are required to report if:

- They become aware that someone is experiencing or at risk of experiencing discrimination, harassment, or bullying.
- An employee suspects that someone connected to PADF is or may be about to carry out a form of discrimination, harassment, or bullying towards employees or others within the workplace.
- They suspect that someone external to PADF is or may be about to carry out a form of discrimination, harassment, or bullying towards an employee.

PADF's reporting routes include:

- Safeguarding Focal Point
- Manager or Supervisor
- Call **0800 915 1571** or email through PADF's hotline, managed by SafeCall, <https://www.SafeCall.co.uk/en/file-a-report/>, a third-party whistleblowing service provider. Service will be provided in the language of the country where your report originates. When you call the hotline, you may remain anonymous if you choose.
- WhatsApp **+1(703)953-9241**

Employment-related concerns should continue to be reported through normal channels, such as to the Director of Talent Management, Country Talent Management Representative, Country Directors, PADF's Executive Director, Chief Administrative Officer, or a senior member of the Talent Management team at headquarters. Alternatively, you may mail written documents to:

PADF Headquarters, 1889 F Street, N.W., 2nd Floor
Washington, D.C. 20006, USA.
Attn: Director of Talent Management

Reports received by Focal Points or Managers must be reported immediately to PADF's hotline, providing as much information as obtained from the disclosure/report made.

Projects and programs assessed as high risk will trigger a decision to establish Community-Based Reporting Mechanisms (CBRMs). Decisions on establishing these will include designating responsibility for handling reports that come from CBRMs to appropriate employees. All safeguarding reports that come from CBRMs must be reported to PADF's hotline.

All reports or concerns raised will be treated confidentially.

Reports of a criminal nature will be reported to the local authorities.

There is no time limit on when someone can raise a concern about something they have experienced. There may be limitations to how a historical concern can be addressed, however, PADF will take every reasonable measure to address the concern.

PADF prohibits any act of retaliation against an employee who makes a report or raises a concern in good faith.

Anti-Trafficking in Persons Policy

This policy is designed to set out PADF's anti-trafficking in persons policies and procedures; make PADF employees and others aware of the conduct prohibited under PADF policy and the Federal Anti-Trafficking in Persons Provisions, and the actions that may be taken for violations; employ fair recruitment, wage, and housing practices; inform PADF employees of available processes for them to report, without fear of retaliation, any activity inconsistent with PADF's anti-trafficking in persons policy; prevent prohibited trafficking activity by suppliers, subcontractors, and sub-recipients, and monitor, detect, and terminate those who engage in such activities; and establish PADF reporting requirements and remediation procedures.

This policy applies to all PADF Employees and Others in all locations, both during and outside of normal working hours.

- Employees: Full-time, part-time, international, and national employees engaged by PADF in any location as well as advisers, consultants, interns, volunteers, Board members, and trustees engaged by PADF
- Others: Employees in partner agencies, sub-grantees or sub-awardees; and any other individuals, groups, or organizations that have a formal or contractual (but not employment) relationship with PADF.

Definition of trafficking

Forms of trafficking in persons include:

- the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, using force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt, bondage, or slavery, and
- sex trafficking in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age.

Prevention

The Safeguarding Policy Framework states the key measures that are taken to prevent harm and abuse to individuals. PADF's Global Code of Conduct identifies how we demonstrate our commitment to PADF values through our behavior.

Standards of Behavior for Anti-Trafficking in Persons

Some aspects of behavior or conduct are both trafficking and sexual exploitation and abuse. This and PADF's Protection from Sexual Exploitation, Abuse, and Harassment (PSEAH) Policy contain prohibited behavior standards.

All PADF employees and others are prohibited from the following behaviors/conduct, whether or not they are engaged in a U.S. government contract:

- Engaging in trafficking in persons.
- Procuring commercial sex acts, including paying for remote interactive sexual activities.
- Using forced labor.
- Engaging in, or facilitating, forced marriage or sexual relations where consent has not been freely given.
- Engaging in or facilitating domestic work that is not in line with internationally recognized labor standards.
- Destroying, concealing, confiscating, or otherwise denying an employee access to their identity or immigration documents.
- Soliciting a person for the purpose of employment, or offering employment, by means of materially false or fraudulent pretenses, representations, or promises regarding that employment.
- Withholding financial wages or exchanging goods for labor, which promulgates trafficking for labor.
- Using recruiters who do not comply with the labor laws of the country in which the recruitment takes place.
- Charging employees' recruitment fees.
- Failing to provide return transportation or pay return transportation costs to an employee from a country outside the U.S. to the country from which the employee was recruited upon the end of employment if the employee requests.
- Providing or arranging housing that fails to meet the host country's housing and safety standards.
- Failure to establish a work environment that respects country or standard practices for water breaks, bathroom access, provision of necessary Personal Protective Equipment for relevant jobs, ensuring access to fair markets (not overinflated) and necessities such as healthcare facilities, etc.

Roles and responsibilities

All managers responsible for programs and operations are responsible for implementing all applicable Anti-Trafficking in Persons Compliance Plan required for their project and for ensuring that project staff comply with the plan.

Staff and partners with responsibility for designing and delivering programs should consider as part of the risk assessments conducted the risks arising from convening program participants in places that might be subject to external recruitment to trafficking. Examples to consider include:

- The situational security PADF provides in and around the physical spaces.
- Risks to organizations with whom PADF works which are targets for recruiters and traffickers.
- Risks associated with access to services that PADF is supporting where recruiters and traffickers might operate.
- Risks associated with differing power within participant groups where individuals are survivors of trafficking.

Reporting

Any violation of this policy by a PADF employee or other should be immediately reported through the reporting routes detailed in the Safeguarding Policy Framework. It is the duty and responsibility of all staff to report suspicions and incidents of labor and sexual exploitation and trafficking through the reporting routes.

Support and care

PADF shall protect all Expatriate and Third Country National employees, suspected of being victims of or witnesses to prohibited activities, before returning to the country from which the employee was recruited and shall not prevent or hinder the ability of these employees to cooperate fully with the Government authorities.

Response and accountability

PADF shall cooperate fully in any Inspector General or agency investigation regarding allegations of human trafficking, including timely and complete responses to auditors' and investigators' requests for documents and access to its facilities and staff.

Violations of the policy may result in the following: removal from the contract or termination of employment.

Protection Against Sexual Exploitation, Abuse and Harassment (PSEAH) Policy

This policy is designed to ensure that PADF provides a safe working environment that is free from any form of sexual harassment, exploitation, and abuse, carried out by any member of the organization or other representative. This policy aims to:

- Raise awareness of the different types of sexual exploitation, abuse, and harassment prohibited.
- Increase understanding of employee rights, roles, and responsibilities in preventing such forms of abuse from occurring in the first instance.
- Ensure that occurrences of sexual exploitation, abuse, and harassment are taken seriously and dealt with promptly and with due care and sensitivity.

This policy applies to all PADF Employees and Others in all locations, both during and outside of normal working hours.

- Employees: Full-time, part-time, international, and national employees engaged by PADF in any location as well as advisers, consultants, interns, volunteers, Board members, and trustees engaged by PADF
- Others: Employees in partner agencies, sub-grantees or sub-awardees; and any other individuals, groups, or organizations that have a formal or contractual (but not employment) relationship to PADF.

Standards of behavior

Pan American Development Foundation does not prohibit Employees from beginning sexual or romantic relationships with each other outside of the unequal power dynamics (e.g. not in the line of management, at a similar job level, or between peers). However, an Employee engaged in or beginning a relationship with another employee or representative has a responsibility to:

- Behave professionally and conduct their relationships in a way that does not impact PADF's work and mission or bring it into disrepute.
- Declare their relationship as soon as possible to their managers or Talent Management, even if the relationship is at an early stage and may not continue. This will be treated confidentially.

- Avoid Conflict of Interest, and the appearance of Conflict of Interest, and ensure they do not make work decisions based on that relationship. For example, if two staff members in a relationship share the same budget line or decision-making responsibility this could lead to a conflict of interest and impact on PADF's work.
- Ensure that their relationship does not lead to fraudulent or corrupt behaviors. For example, staff members organize work trips to the same destination when this is not required for work purposes.

As with the peer relationships above, consensual sexual activity and/or relationships between PADF staff and partner staff is not prohibited if they:

- Behave professionally and conduct their relationships in a way that does not impact PADF or the partner's work or mission.
- Declare their relationship as soon as possible to their managers or Talent Management, even if the relationship is at an early stage and may not continue. This will be treated confidentially.
- Avoid Conflict of Interest, and the appearance of Conflict of Interest, and ensure they do not make work decisions based on that relationship.
- Ensure that their relationship does not lead to fraudulent or corrupt behaviors.
- A supervisor who enters or is having a consensual relationship with a subordinate who is not within their direct or indirect line of supervision is still required to immediately report the matter in writing to the Director, Talent Management or the country Talent Management representative. PADF reserves the right to take appropriate action up to and including termination upon review.

Behaviors which are prohibited under this Policy include but are not limited to:

- Managers and supervisors are prohibited from dating or pursuing or engaging in romantic or intimate relationships with employees whom they supervise, directly or indirectly. This can also include other relationships that create a real or perceived conflict of interest³.
- Sexual activity with staff from its partners where this is or could be viewed as an abuse of power.
- Directly or indirectly promising an employee or PADF Third Party a reward based on compliance with a sexually oriented request; directly or indirectly denying an employee (or applicant) an employment-related opportunity if the employee or applicant refuses to comply with a sexually oriented request.
- Unwelcome sexual advances, whether they involve physical touching or not, requests for sexual favors, leering, whistling, brushing against the body, sexual gestures, suggestive comments; sexual epithets, jokes, written or oral references to sexual conduct, gossip regarding one's sex life, comment on an individual's body, or comment about an individual's sexual activity, deficiencies, or prowess.
- Making sexual or romantic advances toward any employee or PADF Third Party and persisting despite the employee or PADF Third Party's rejection of such advances
- Unwelcome and repeated flirtations, propositions, or advances despite the individual's rejection of such advances
- Whistling, leering, or making improper, sexually explicit gestures.
- Offensive, insulting, derogatory, or degrading remarks of a sexual nature or based on an individual's sex or gender.
- Any sexual or romantic activity with children (persons under 18) regardless of the legal age of consent in the country. Mistaken belief in the age of a child is not a defense.
- Use of any computer or other electronic device to view, download, distribute, or create indecent or inappropriate images of children, or in any other way possess or access child pornography.
- Romantic or sexual relationships with program participants. PADF recognizes that certain national team members may come from or be part of communities that participate in PADF programming, and their families may be direct or indirect recipients of or participants in PADF programs. National team members must exercise caution, always ensure that their relationships with members of the community do not involve any form of sexual exploitation or abuse, and formally disclose any relationship to their country's Human Resources Manager (or equivalent).

Reporting

It is the duty and the responsibility of all staff and other representatives to report any suspicions or incidences of sexual

³ In the case of the most senior employees at the director or leadership team level, this prohibition includes sexual or romantic relationships with any more junior employees.

harassment, exploitation, and abuse. This applies to PADF Employees and Others.

PADF is committed to creating a working culture in which everyone feels safe to raise a concern. If a staff member or other PADF representative **does not** report an incident or suspicion, they will be in breach of the Code of Conduct and may face disciplinary proceedings. This does not apply to survivors who can decide if, when, and how to report.

All members of the staff are required to report if:

- They become aware that someone is experiencing or at risk of experiencing sexual harassment, exploitation, or abuse.
- A staff member suspects that someone connected to PADF is or may be about to carry out sexual harassment, exploitation, and abuse towards Employees or others within the workplace.
- They suspect that someone external to PADF is or may be about to carry out sexual harassment, exploitation, or abuse towards an Employee.

Response and accountability

If the allegation does not relate to PADF, then the organization will look at how best to safely respond (including raising with external agencies better able to support) and will take any action with the best interests of the survivors in mind.

Concerns raised about an ex-PADF Employee or Other (e.g. people formally employed by PADF in any capacity) will be addressed, recognizing potential legal challenges to such processes.

Any concerns raised relating to sexual harassment, exploitation, or abuse of PADF employees by PADF employees will be addressed as a priority, in line with the commitments in the Safeguarding Policy Framework.

In some cases, concerns may fall partially or wholly under other policies. There can be a grey area between sexual harassment (any type of unwanted sexual behavior) and other forms of discrimination (racism, sexism, homophobia, ageism, transphobia, etc.).

Safeguarding Children and Communities Policy

This policy is designed to ensure that PADF treats all participants in our projects and host community members with respect and dignity and never engages in conduct that could be perceived as abusive, exploitative, or harassing.

This policy also covers any contact that PADF Employees and Others may have with children or at-risk adults within or outside the workplace. Definitions of a child and at-risk adult can be found in Glossary Annex A of the Safeguarding Policy.

This policy aims to:

- Raise awareness of the different types of unacceptable behavior between PADF and the communities with whom we work.
- Increase understanding of employee rights, roles, and responsibilities in preventing such unacceptable behavior from occurring in the first instance.
- Ensure that occurrences of unacceptable behavior are taken seriously and dealt with promptly and with due care and sensitivity.

This policy applies to all PADF Employees and Others in all locations, both during and outside of normal working hours.

- Employees: Full-time, part-time, international, and national employees engaged by PADF in any location as well as advisers, consultants, interns, volunteers, Board members, and trustees engaged by PADF
- Others: Employees in partner agencies, sub-grantees or sub-awardees; and any other individuals, groups or organizations that have a formal or contractual (but not employment) relationship with PADF.

Definitions of Harm

This policy covers harm that might arise from PADF's interactions with children and communities or because of the work being delivered. This includes emotional, physical, and sexual harm, as well as neglect. Definitions of these forms of harm can be found in the Glossary Annex A of the Safeguarding Policy. Included in this Policy is a reference to adults who may be deemed "at risk". This acknowledges that adults may need safeguards to be in place because of their

circumstances.

PADF has also developed a Protection from Sexual Exploitation, Abuse and Harassment (PSEAH) Policy in recognition of the seriousness of this issue and the priority focus given to this issue in the aid and development sector. Forms of SEAH that are experienced by children and communities, and perpetrated by PADF Employees, are described more fully in the Policy. Also included in the Policy are measures on how to prevent and respond to violations of this Policy.

Standards of Behavior

Behaviors prohibited include all sexual or romantic activity with children (persons under 18) as outlined in the PSEAH Policy. The PSEAH Policy also prohibits PADF Employees and Others from engaging in romantic or sexual relationships with program participants.

The minimum requirements for all Employees and Others to safeguard children are:

- Avoid working alone with a child and plan your work so that at least two adults are present at any time. If working alone is unavoidable, you should move to an area/workstation where you and the child can both be seen by other adults.
- Avoid inappropriate physical contact with a child. If a child is hurt or distressed, do your best to comfort or reassure her/him without compromising her dignity or doing anything to discredit your own behavior. Aim to understand local norms around physical contact between children and adults and ensure that any appropriate physical contact, such as holding hands, is initiated by the child.
- Avoid spending excessive time alone with a child.
- Avoid taking children to your home. Do not have a child with whom you are working, stay overnight at your home unsupervised.
- Behave appropriately; ensure that language is moderated in their presence and refrain from adult jokes or comments that may cause discomfort or offense. Do not use language, make suggestions, or offer advice that is inappropriate, offensive, or abusive.
- Be sensitive to local norms and standards of behavior towards children. Do not hit or otherwise physically assault or abuse them, and do not develop physical/sexual relationships or any relationships that could be deemed exploitative or abusive.
- Listen to what the children are saying and respond appropriately.
- Plan activities in advance to ensure they consider the age range and ability of all participants. Age, gender, nature of the activity, and any special needs of the individuals should be considered.
- Do not do things for a child of a personal nature that they can do for themselves.
- Be aware of situations that may present risks and know how to manage them.
- Be familiar with the procedures for reporting concerns or incidents at PADF and know how to contact the Safeguarding Focal Point.
- Immediately report any concerns about a child's welfare to the local Safeguarding Focal Point. You should do this whether your concerns are based on allegations from the child or from your own suspicions.
- Maintain confidentiality.
- Do not condone or participate in behavior towards children or communities that is illegal, unsafe, or abusive.
- Do not act in ways intended to shame, humiliate, belittle, or degrade children or communities.
- Do not discriminate against or show deferential treatment or favor for particular children or community members.
- Similar standards of behavior as described above also apply when working with adults who are deemed to be "at risk".

Recruitment and screening

Enhanced screening practices for positions with direct or indirect contact with children and communities include:

- Position descriptions to be categorized for contact with children and communities, or access to their information.
- Interviews for these positions should be conducted by a panel that includes at least one person with child/adult safeguarding expertise.
- Where possible, successful candidates for these positions will undergo enhanced criminal records checks and which must be renewed every two years.

PADF will not knowingly employ any individual with a criminal conviction related to children, vulnerable groups, or other such offenses related to their prospective position.

Capacity building of staff and others

PADF employees who will, or do, have contact with children and communities have opportunities to understand how to interact with children and adults at risk, identify concerns, receive disclosures appropriately, and report within the timeframe required to ensure the child or adult at risk is not put at further risk of harm.

Safe programs and research

All programs and projects are assessed for the risk of harm to program participants and host communities. Reasonable risk mitigation measures are incorporated into the design and delivery of the program.

Concerning children:

- The safe design of programs involving adult participants must consider whether the adult participants are parents and the potential impact on them of their parental involvement in the project e.g. childcare arrangements during project activities.
- Children's involvement in programs and project activities must be accompanied by informed consent from the child (if over 16 years) and the child's parents.
- Care must be taken when involving children in activities or events involving traveling away from home or presenting specific risks e.g. advocating sensitive issues.

Similarly, programs or enterprises involving adults who might be deemed 'at risk' (e.g. they have particular disabilities or are in circumstances that might increase their risk of harm and abuse) should ensure that the adults (or their carers) understand what participation in the program or enterprise involves, consent to it and have the necessary care or support arrangements in place to be able to participate safely.

Each program or project will conduct community awareness-raising sessions with communities on PADF commitments to safeguard and protect them from harm. This should be done using language and content-appropriate messaging and include explicit reference to acceptable and unacceptable behaviors by PADF staff.

Reporting

The mechanisms for reporting are described in the Safeguarding Policy Framework. In addition, each program will establish Community-Based Reporting Mechanisms.

Community-Based Reporting Mechanisms

PADF will work with communities to establish Community-Based Reporting Mechanisms (CBCMs) which enable children and communities to feel comfortable and confident to report concerns.

The CBCMs will be in addition to the routes available for employees and others to report concerns (described in the Safeguarding Policy Framework).

All reports of misconduct that come through CBCMs will be reported immediately to PADF.

Survivor support and referrals will be done according to the services and support mappings available in each area of operation.

Response and accountability

Concerns or reports of harm and abuse of children that are not perpetrated or caused by PADF will be reported to national or local formal authorities. PADF will determine whether these avenues are safe to use and explore alternatives as necessary.

Concerns or reports of harm and abuse of adults in communities that are not perpetrated or caused by PADF will prompt PADF to discuss with the adult, or person making the report, how to support the adult through signposting national or local referral and reporting routes so that the adult can obtain the support he or she requires.

Whistleblowing Policy

PADF is committed to lawful and ethical behavior in all its activities and requires that its management, employees, and consultants conduct themselves in a manner that complies with both the letter and the spirit of all applicable laws, as well as PADF organizational policies.

PADF has adopted a Whistleblower Policy to deter, expose, and address illegal or unethical conduct in connection with PADF.

PADF Commitments

- PADF expects all employees and Partners to adhere to the highest standards of accountability, which requires honest and ethical conduct. PADF expects management to maintain a culture that supports and strengthens commitment to these high standards.
- It is the responsibility of all employees to comply with PADF' ethical principles as contained in the Code of Conduct, and Safeguarding Policy and to report immediately violations or suspected violations in accordance with this policy.
- This policy is intended to encourage and enable employees and Partners to raise allegations of violations of PADF's Policies, waste and/or mismanagement of funds, abuse of authority, substantial and specific danger to public health and safety caused by PADF or its Partners, or violations of any law, rule, or regulation related to donor requirements, or other illegal conduct (collectively referred to herein as "Violations") in good faith, without the fear of retaliation, internally so that PADF can address and correct inappropriate conduct and actions.
- PADF prohibits any act of retaliation against an employee who makes a good faith complaint of discrimination or harassment, or who cooperates in an investigation under this policy. This no-retaliation policy applies whether a good faith complaint of discrimination or harassment is well founded or ultimately determined to be unfounded.
- No PADF manager or supervisor is authorized, or permitted, to retaliate or to take any adverse employment action whatsoever against anyone for reporting unlawful discrimination or harassment, for cooperating in an investigation of such conduct, or opposing any other discriminatory practice in the workplace.
- PADF will not terminate, threaten, or discriminate against a supervisor, employee, or consultant in any manner because that person reported in good faith what they reasonably believed to be a violation of law or policy, or other unethical or illegal conduct or because they assist in an investigation of such alleged conduct. The right of a whistleblower to protection against retaliation does not include immunity for any personal wrongdoing.
- Any employee who feels they have been retaliated against in violation of this no-retaliation policy, or who witnesses or learns of such retaliation, is responsible for reporting the retaliation in the same manner as any other form of discrimination or harassment.
- PADF will impose disciplinary measures, up to and including termination of employment, against anyone who threatens or retaliates against a board member, employee, or consultant who makes such a good-faith report. Any whistleblower who believes they are being retaliated against should contact the Chief Administrative Officer or other member of the senior management team at headquarters immediately.

Processes and Procedures

Reporting

If you have knowledge of any misconduct or wrongdoing, you have a duty to report it, with facts and information sufficient to enable a thorough yet discreet investigation of the alleged activity. Reports should be made:

- Directly via email or telephone to the Chief Administrative Officer at PADF Headquarters in Washington, D.C., or to the Director of Talent Management at headquarters.
- If these senior leaders are involved, you should report directly to the Executive Director.
- You may also submit a concern directly to the PADF WhatsApp **+1(703)953-9241**.
- Call **0800 915 1571** or email through PADF's hotline, managed by SafeCall, <https://www.SafeCall.co.uk/en/file->

[a-report/](#), a third-party whistleblowing service provider. Service will be provided in the language of the country where your report originates. When you call the hotline, you may remain anonymous if you choose.

- Employment-related concerns should continue to be reported through normal channels, such as to the Country Talent Management representative or Country Director, PADF's Executive Director, Chief Administrative Officer, or a senior member of the Talent Management team at headquarters. Alternatively, mail written documents to:

PADF Headquarters, 1889 F Street, N.W., 2nd Floor, Washington, D.C. 20006, USA. Attn: Chief Administrative Officer.

If the reports are safeguarding concerns, the Safeguarding Policy Framework describes additional reporting routes available for these concerns.

Education and Awareness

All Employees will be trained on the contents of this policy via PADF's mandatory Code of Conduct training.

All PADF offices will display posters on what to report and how, translated into the primary language of the office, in conspicuous locations where all staff will see them.

Partner Contractual Requirements

All PADF agreements with Partners will include a clause that requires the Partner to adhere to the substance of this policy and to communicate this policy to their staff.

Other Policies under the PADF Global Code of Conduct

Business Code of Conduct and Ethics

PADF has an excellent reputation for conducting its business activities with integrity and fairness, following the highest ethical standards. Our success depends on the trust and confidence earned from our employees, clients, and stakeholders. We gain credibility by adhering to our commitments, displaying honesty and integrity, and achieving goals solely through professional conduct.

As an employee, you enjoy the benefits of that reputation and must uphold it in every business activity. If you are ever in doubt as to whether an activity meets PADF's ethical standards or compromises the organization's reputation, you should discuss it with your supervisor.

When considering any action, ask yourself: Will this build trust and credibility for PADF? Will it help create a working environment in which PADF can succeed over the long term? Can we follow that commitment? The only way to maximize trust and credibility is by working every day to build PADF's trust and credibility.

Although no discussion of ethical behavior and misconduct can cover every circumstance, the following is PADF's Business Code of Conduct and Ethics. It is designed to protect PADF and to support a professional and respectful workplace environment. Under this Code, you and every employee are expected to:

- Conduct all aspects of PADF business in an honest, ethical, and legal manner; comply with all PADF policies; and obey the laws of the U.S. and every state and country where you are conducting business.
- Conduct work on behalf of PADF with the highest standards of honesty, integrity, and fairness.
- Be responsible for your actions and their consequences. You will not be excused from misconduct because another person ordered or asked you to participate in misconduct.
- Refrain from offering, giving, or transferring anything of value, except as specifically permitted by law or regulation, for your own benefit or that of PADF or its clients, or to any government official, employee, or agent. "Anything of value" includes both tangible benefits (such as money, goods, services, or entertainment) and intangible benefits (such as promises of future employment or beneficial treatment).
- Alert your supervisor or PADF senior management whenever you observe, learn of, or suspect of any dishonest or illegal conduct, or any other conduct that violates PADF policies.
- Respect the rights of all employees to fair treatment and equal opportunity without illegal discrimination or harassment of any type, consistent with PADF's Equal Employment Opportunity and Anti-Discrimination and Anti-Harassment Policy.

- Ensure that all PADF financial transactions and other documentation are handled honestly and recorded accurately. This commitment extends to reporting and charging time.
- Avoid conflicts of interest, both actual and perceived, consistent with PADF's Conflict of Interest Policy. Conflicts of interest are those outside activities or personal interests that could influence objective decisions made in the performance of the employee's responsibilities.
- Recognize and act to prevent even the appearance of misconduct or improper behavior, which can be very damaging to PADF's reputation.
- Cooperate fully in any investigation of alleged misconduct.

Prohibited conduct includes, but is not limited to, the following:

- Use of profanity, racial epithets, or other derogatory or abusive language.
- Unauthorized use, misuse, removal, or intentional damage to PADF property or the property of a co-worker, client, other person, or organization with whom PADF interacts.
- False, fraudulent, misleading, or harmful statement, action, or omission involving another employee, PADF Third Party, or PADF.
- Violation of safety, fire prevention, health, or security rules, policy, or practice.
- Threatened or actual physical violence.
- Falsification of PADF or employee records, including timesheets.
- Theft or misappropriation of the property of PADF, an employee, or other PADF Third Party.
- Insubordination.
- Engagement in unethical business practices or activities.
- A violation of any policy adopted by PADF, in this Global Code of Conduct or otherwise.
- A violation of any applicable federal, state, or local law.

Please direct your questions about this business code of conduct and ethics, or about what to do or not do in a particular situation, to your immediate supervisor.

If you violate this policy, you may be subject to disciplinary action, up to and including termination of employment. Additionally, PADF may notify the appropriate authorities when warranted. For example, theft, fraud, and violence in the workplace may be reported to the police.

As part of this Business Code of Conduct and Ethics, if you cause financial damage to PADF by malice, culpable negligence, or failure to observe PADF By-Laws, financial rules, procedures, regulations, or other administrative provisions, you may be held personally liable and required to reimburse PADF for any loss, damage, cost, or expense, in the amount determined by the Executive Director, based upon the findings of the audit firm, the Chief Administrative Officer, and/or the Talent Management Team to the fullest extent permitted by law. Any liability for repayment is independent of the disciplinary procedures defined in these standards of conduct.

To declare an employee liable under this policy, the Talent Management Team will investigate relevant information and collect pertinent proof. This documentation will be sent to the Executive Director or a designee who will issue a declaration of liability against the employee if deemed appropriate under the circumstances.

Employees declared liable will be personally accountable to PADF for the damage or loss. This does not preclude the application of disciplinary measures stipulated in these standards of conduct. If more than one employee caused the expense or loss, the declaration of liability should state this. The amount of liability may be joint and apportioned according to the degree of each party's participation.

Upon hire and on an annual basis, you must read this entire policy and sign the acknowledgment form stating that you have read and understood it.

Conflict of Interest

This policy sets forth PADF's guidelines and procedures for identifying, resolving, or managing real, potential, or perceived conflicts of interest. Any effort to influence PADF's work or direct its resources, or any relationship that might cause a reasonable person to question the objectivity of PADF's work, could present a conflict of interest or the appearance of one and should be disclosed and resolved in accordance with this policy.

As a PADF employee, you are expected to promote the goals, policies, and objectives of PADF and may not engage in any employment, hold any business interest, or participate in any business venture that conflicts with its goals, policies, and objectives. You may not engage in any employment or participate in any business that in any way interferes with the performance of duties as a PADF employee.

In serving the organization, you act not in your own interests or those of others, but solely in the interests of PADF. You are obliged to have undivided allegiance to PADF and not use your position or information about PADF or its policies or operations in a manner that allows you to secure a pecuniary or other material benefit for yourself, your relatives, or your or their business interests. You must treat information gained through the review of non-public documents, drafts, or financial statements as confidential information.

PADF will not normally award a grant, cooperative agreement, or contract to a not-for-profit organization or contractor in the U.S. or overseas whose board of trustees, officers, or employees include PADF employees' family members. When PADF considers an award or contract to such an organization, the Executive Director will be informed of the specifics of the award and an analysis of its merits and the reasons this organization is uniquely qualified. The award will not be made without the prior written approval of the Executive Director.

Based on your reading of this policy, if you believe you may have a conflict of interest or a possible appearance of a conflict of interest with PADF, you should notify the Executive Director, the Chief Administrative Officer, or another senior member of the Talent Management team at headquarters of such conflict or appearance in writing. (If that employee is the Executive Director, he or she will notify the PADF Board of Trustees Executive Committee in writing.) If a conflict is confirmed, the proposed transaction will not proceed without a careful analysis of alternatives not presenting a conflict. Such an exercise may include an analysis of comparable bids or the establishment of a competitive process.

Sample examples of conflicts of interest include:

- **Outside activities and interests.** Regardless of your employment status, do not work outside of PADF if doing so poses a conflict of interest, either financially or managerially. If your position with PADF allows you to benefit financially from another organization, this could be a conflict or appear to be one and should be avoided. If you are in doubt about what this means, speak with the Executive Director, Chief Administrative Officer, or a senior member of the Talent Management team.
- **Public speaking.** PADF recognizes that its employees may be asked to participate in public relations or media-related activities such as delivering a public address, speech, or interview, and/or participating in a radio or television appearance. If so, please obtain prior written authorization from the Executive Director or, if applicable, the Country Director, to ensure that no conflicts of interest exist.
- **Property rights for work performed.** All rights, title, and interests in the work performed or products created by you in the context of your employment at PADF, regardless of where the work is performed, or products created during standard working hours, is considered "work for hire" and, therefore, is the property of PADF. Such work or products includes but are not limited to all written and edited text materials (e.g., records, documents, memoranda, notes, etc.), projects, concepts, designs and inventions, graphic designs, audio, visual, and web-based productions, and computer software programs or code. To the extent such inventions and creations are not deemed "work for hire," they must be transferred to PADF for its continued use. All such intellectual property, including copyright, trademark, trade name, and patent rights for any work that you produce as an employee or a consultant as part of your PADF official duties will be fully vested in and belong to PADF. PADF retains the right to all such work products, including work that is not reduced to writing, patentable, or protectable for copyright.

Additionally, a conflict of interest exists when the interests or potential interests of any employee or that person's relative, or any individual, group, or organization to which that person has allegiance, may be seen as competing with PADF's interests or concerns or may impair or compromise that person's independence or loyalty to PADF. For the purposes of this policy, a relative is defined as a spouse or domestic partner; sibling (by whole or half-blood); spouse of a sibling (by whole or half-blood); ancestor; child; grandchild; great-grandchild; or spouse of a child, grandchild, or great-grandchild.

For example, a conflict of interest exists if an employee or relative:

- Has a business or financial interest in any third party dealing with PADF. This does not include ownership interest of less than 5 percent of outstanding securities of public corporations.
- Holds office, serves on a board, participates in management, or is employed by a third party dealing with PADF (including any party receiving PADF grant funds), or competes with PADF for activities and funding.
- Derives remuneration or other financial gain from a transaction involving PADF.
- Receives gifts from any third party because of their position with PADF (other than occasional gifts valued at no more than \$50 or, if valued at more than \$50, the gift is made available in a team space or common area for others to share, such as fruit baskets or boxes of candy). You should return all other gifts to the donor explaining that PADF policy does not permit the acceptance of gifts. Employees or relatives should never accept a personal gift of money.
- Engages in any outside employment or other activity that will materially encroach on that person's obligations to PADF, compete with PADF activities, involve any use of PADF equipment or facilities, or imply PADF sponsorship or support of the outside employment or activity. Do not use information received from participation in PADF's governance, management, or operations, whether expressly denominated as confidential or not, for personal gain or to the detriment of PADF.
- As set forth below, you may not discuss or accept employment with a partner, subgrantee, or subcontractor during your contract term, while employed by PADF, or within six months of leaving PADF.
- Upon hire and on an annual basis, you must read this entire policy and sign the acknowledgment form on the last page stating that you have read and understood it.

Other Employment and Outside Activities

You may not perform any work unrelated to PADF business on PADF premises or with PADF facilities and equipment unless specifically authorized by the relevant department or Talent Management. You may not privately perform any outside work for any client of PADF or any other employer that could represent a conflict of interest. In all business dealings, you must conduct yourself in a manner that reflects well on PADF. Breach of these conditions may be cause for termination of employment.

Efficient and competent performance of your duties on behalf of PADF is your primary obligation during your employment with PADF, and continuing satisfactory performance is a requirement for continued employment at PADF. Your involvement in outside employment, consulting, and other activities, such as participation in civic or professional activities, must not require so much time as to materially affect your work for PADF.

Employment with Subcontractors, Sub-grantees, or Partners

Because PADF often works in conjunction with subcontractors, sub-grantees, and/or partners, PADF employees must avoid actions that constitute or could be construed as conflicts of interest.

As a condition of your employment at PADF, you must agree that, while employed at PADF or within six months of leaving PADF employment, you may not solicit, discuss, or accept employment or other relationships involving compensation or remuneration with any entity that is a partner, sub-grantee, or subcontractor on a PADF contract or project during the term of the contract or project.

As a condition of your employment at PADF, you must agree that you will not solicit or discuss employment, or other relationships involving the compensation or remuneration of a relative or individual to whom you have allegiance, with any entity that is a partner or subcontractor on a PADF contract or project.

Outside Employment and Activities

Outside employment is permitted, however, outside employment may not:

- Coincide or conflict with hours of scheduled work at PADF.
- Conflict with job responsibilities or affect your ability to perform satisfactorily at PADF.
- Cause you to arrive late or leave early from your PADF job.

You are required to notify your supervisor and the Chief Administrative Officer in writing about the outside position and job responsibilities to determine that there is no conflict. Failure to do so may result in disciplinary action. The Talent Management team will maintain this documentation together with your employment records.

You may not participate in managing an industry or business or have any financial interest therein if, due to your official position with PADF, you can benefit from such association or financial interest. You should always avoid conflicts of interest or the appearance of conflicts of interest.

Upon hire and on an annual basis, you must read this entire policy and sign the acknowledgment form on the last page stating that you have read and understood it.

Anti-Corruption Policy

Employees and Others, in the U.S. or internationally, should be aware of the U.S. Foreign Corrupt Practices Act. The Act prohibits giving anything of value to “foreign officials” to obtain or retain business. PADF’s Employees and Others are not permitted to engage in bribery, kickbacks, payoffs, or other corrupt business practices. You should address any questions related to the Foreign Corrupt Practices Act to the Talent Management department.

The Foreign Corrupt Practices Act defines a “foreign official” broadly to include:

- Any officer or employee of a foreign government or any department, agency, or instrumentality of the government.
- Employees of state-owned or state-controlled commercial enterprises.
- Any political party or official thereof.
- Any candidate for political office.
- A public international organization, such as the United Nations or World Bank, or any department or agency thereof.
- Any person formally authorized to act or speak on behalf of a foreign government or its department, agency, or instrumentality, or a public international organization.

The Foreign Corrupt Practices Act anti-bribery provisions apply to the giving of anything of value, not only money. This includes, for example, job opportunities, favorable contracts, gifts, or entertainment.

It is PADF’s policy to fully comply with all applicable U.S. export, customs, and trade control regulations, licensing requirements, and other relevant U.S. and international laws. As the need arises, PADF’s Finance and Risk Department can help employees facilitate compliance with these requirements.

Acknowledgment of this policy certifies that no assistance, payments, or anything of value (monetary or non-monetary) shall be made, promised, offered to, or accepted by any government employee or official:

- In contravention of any U.S. or other applicable law (including, but not limited to, the U.S. Foreign Corrupt Practices Act) or regulation.
- Without the express consent of the government for which the employee or official works.
- That is not reasonable, bona fide, and directly related to activities funded under the working agreement.

You are responsible for ensuring compliance with this policy, maintaining, and providing at PADF’s request a signed acknowledgment demonstrating such compliance. PADF employees may not accept any payment or other form of assistance from or offer such payments or other assistance to any government official or employee to:

- Influence any official government act or decision.
- Induce any government official or employee to do any act in violation of their lawful duty.
- Obtain or retain business for, or direct business to any individual business or entity.

Upon joining PADF and on an annual basis, you must read this entire policy and sign the acknowledgment form stating that you have read and understood it.

Confidential Information

Never discuss confidential information concerning PADF with any outside party without prior permission from PADF management. Violation or suspected violation of this rule may result in the immediate termination of employment of the offending employee, affiliate, or third party.

While employed by PADF, and following your separation from employment, you are prohibited from directly or indirectly disclosing, furnishing, or making accessible to anyone any confidential information or using, copying, or removing from the premises any confidential information other than in an authorized manner in the regular course of your employment by and for the benefit of PADF. Upon your separation from employment with PADF, or upon request, you must return to your supervisor, all papers, notes, books, work products, or other documents or property in any format belonging to PADF or relating to its business and operation or containing Confidential Information.

For purposes of this policy, the term "Confidential Information" includes:

- Any technical or business information relating to PADF's programming, budgets, cost structures, research and development, finances, marketing, business processes or procedures, and strategic business plans. The identities of, and any information, data, and/or materials containing personally identifiable information regarding, current, prospective, and/or former donors of PADF or any of its subsidiaries or affiliates.

Confidential Information can take any form (including all manner of electronic records), regardless of whether marked "Confidential." Specific information contained in our personnel files affecting the individual privacy rights of our employees may also be protected from public disclosure, in accordance with applicable law and PADF policy and practice.

All confidential information and copies thereof are the sole property of PADF.

If you are unsure about the confidential nature of specific information, you should ask your supervisor for clarification and/or guidance. Individuals may be subject to disciplinary action, up to and including termination of employment, for knowingly or unknowingly revealing or misusing confidential information.

Nothing in this policy shall be deemed to interfere with, restrain, or prevent employee disclosure rights protected by law, including an employee's right to engage in employee communications regarding wages, hours, or other terms and conditions of employment.

Upon joining PADF and on an annual basis, you must read this entire policy and sign the acknowledgment form stating that you have read and understood it.

Social Media and Online Communications

PADF recognizes that social media and other forms of online conversation are an increasingly important part of our lives and our business.

PADF sees social media as one of many communications tools that can effectively advance its business. However, its use can present certain risks and carries certain responsibilities. To help you make responsible decisions about your use of social media, PADF has established the following guidelines.

"Social media" includes, but is not necessarily limited to, personal and professional websites, blogs, microblogs (such as X former Twitter), podcasts, bulletin boards, video sites (like YouTube), social networking sites (Facebook, LinkedIn, etc.), individual pages on social networking sites, Wikis (such as Wikipedia), photo-sharing and multimedia websites (such as Pinterest, Instagram, or Snapchat), podcasts, online comments and forums, and any other sites where text or other content can be posted, accessed, or viewed.

This policy uses the terms "use" or "publish" in connection with social media, including any type of communication or

information sharing through social media by, for example, comments, ratings, recommendations, messages, postings, status updates, photographs, graphics, audio files, and videos.

To ensure the responsible and appropriate use of social media, this policy provides guidelines on the use of social media in two distinct circumstances: (1) for the use of social media personally (“for personal use,”) and (2) for authorized business purposes on behalf of PADF (“for PADF business”).

Differing guidelines apply to social media for personal use and PADF business. You are expected to pay careful attention and adhere to all relevant guidelines.

PADF expects that all employees and representatives adhere to this policy and to applicable local laws of the countries where PADF operates and from which they may post on social media. PADF will monitor its social media outlets. Employees should have no expectation of privacy in anything they publish through any social media outlet. Any violations of this policy will be deemed unacceptable behavior and may result in disciplinary action, up to and including termination of employment. PADF reserves the right to take any actions necessary to protect its reputation and resources. You should not interpret this policy as interfering with your federal or state labor law rights, free speech, or any whistleblower protections under U.S. federal or state law, or applicable local laws of the countries where PADF operates.

Employee Use of Social Media for PADF’s Business

Do not use social media for PADF business that is outside of your job responsibilities. Only individuals officially designated by PADF have authorization to speak on behalf of the organization. How you use social media as part of your job responsibility, and in a manner that does not alter other responsibilities, is a management decision.

Before using social media for PADF business and agreeing to its terms of use or service, the social media must be on PADF’s approved list or approved by the Executive Director. Factors that will be considered in approving specific uses of social media for PADF business include, but are not limited to, the relevance of the use to current or planned PADF projects, the position and responsibilities of the individual making the request; other participants, if any (e.g., target audience, proposed partners and/or social media/web platform, etc.); and appropriateness of the particular subject matter and social media/web platform for PADF participation.

Seek direction on appropriate use of social media from PADF’s Communication team to ensure it is balanced and coordinated with the activities of others at and on behalf of the organization.

PADF reserves the right to monitor, change, or require an employee to discontinue the use of social media for PADF business. Your use of social media for PADF business may be considered in evaluating your job performance; however, PADF is not assuming a duty to monitor any social media activity in which employees participate.

When in doubt about posting to social media, don’t post! Once a posted you cannot take it back. Direct any questions to PADF’s Communication team in your country or at headquarters.

Nothing in this social media policy is designed to interfere with, restrain, or prevent employee communications regarding wages, hours, or other terms and conditions of employment. Employees have the right to engage in or refrain from such activities.

Upon hire as a PADF employee, and on an annual basis, you must read this entire policy and sign the acknowledgment form stating that you have read and understood it.

Basic Guidelines for Using Social Media for Personal Use or PADF Business:

- What you publish through social media is public and a reflection of you—and potentially of PADF. Others can store and back up indefinitely. Therefore, you should be thoughtful and conscientious about what you publish on social media.
- Transparency adds credibility. If discussing PADF (in personal communications or for PADF business), you must clearly identify yourself as a PADF employee (or, if not an employee, describe your relationship to the organization). When engaging in such discussions, if the use is personal, you must make it clear that you are

posting as an individual and not on behalf of PADF. You may use the following disclaimer language, “The views expressed on this website/blog are mine alone.”

- Using your name and a PADF email address may imply that you are acting on PADF’s behalf. Because social media and networking activities are public, you should use a PADF email address and assets only for authorized job-related activities. Never attribute information and communication published on personal sites to PADF and be careful to avoid the appearance that such statements were endorsed by, or originated from, PADF. You may be held responsible for the information published online, whether it is on PADF’s network or using PADF email if it violates PADF’s policies.
- Anything you publish via social media must respect and comply with all country, local, state, and federal laws and regulations. You must comply with copyright, trademark, trade secrets, fair use, financial disclosure, and other applicable laws. For example, PADF must grant permission for the use of group logos or trademarks.
- You may not publish PADF confidential information on social media, including, but not limited to, trade secrets, donor information, beneficiaries lists or data, group data, partner and/or vendor data, PADF financial information, email communications, and other information not generally available to the public.
- What is published on social media should be respectful of PADF employees, beneficiaries, donors, partners, suppliers, and others in the industry.
- You may not publish express or implied statements or other content (including, but not limited to, photographs, videos, or other graphics) through social media that are defamatory, obscene, discriminatory, threatening, harassing, false, or misleading, or that would not be acceptable in other PADF communications vehicles, in the PADF workplace, or at PADF meetings.
- You must read, understand, and comply with the terms of use or service of social media that you use before you publish content to it or share content with others.

Managing and Responding to Social Media Content

You should not invite or escalate conflict when using social media. If you feel anyone has published inappropriate, illegal, untrue, or damaging content about you; other PADF employees; or other PADF partners, vendors, or agents and/or their employees; the organization as an entity; or anything you believe violates this policy, you should report this promptly to the Director of Communications. These situations, if they arise, may be more complex to handle than they appear. Do not attempt to respond on your own.

Should your authorized online comments or posts about PADF result in third parties (including the news media) contacting you and requesting information about PADF, refer the requesting party to the Director of Communications, local Country Director, or the Executive Director, as appropriate.

Promptly report significant errors in the use of social media for PADF business or for personal use to the extent that it pertains to the organization (e.g., the publication of untrue, misleading, or damaging content) to the Director of Communications. Do not attempt to address these types of situations on your own.

Promptly correct any minor errors made when using social media, such as inaccurate links or incorrect dates.

Computer Systems, Mobile Devices, Internet, and Electronic Mail

PADF provides the tools necessary for successfully conducting the organization’s business. All employees must abide by PADF policies and procedures while using equipment and software provided for this purpose. Equipment includes computers (all files, email, and internet data), mobile and landline telephones, laptops, and tablets. All equipment and information transmitted by, received from, or stored in such equipment is the sole property of PADF. PADF reserves the right to search, access, review, copy, or modify this property. PADF may also disclose such information to other parties (inside or outside of the organization) consistent with its privacy policies and the law. Please refer any specific questions to PADF’s Information Technology department.

Limit your personal use of company equipment. Do not use it to send, receive, or store any information that you wish to keep private. Treat all company equipment and systems like a shared file system, with the clear expectation that

any information sent, received, or stored anywhere on PADF equipment or property will be treated as non-personal business communications, available for review, and may potentially be disclosed to third parties.

Computer Messaging and Information Systems

Employees are particularly cautioned that the use of e-mail, voicemail, or other electronic messaging systems, or the Internet may give rise to liability for discriminatory or harassing conduct. Employees may not generate nor forward any message or graphic that may be offensive based on any Protected Category. Employees receiving offensive messages, graphics, or content over PADF's computer or other communications equipment should report those messages to their supervisor.

Employees are reminded that PADF's computer, internet, and phone and the data generated on, stored in, or transmitted to or from the Company's computers and other communications equipment remain the property of PADF for all purposes. No employee is authorized to use any PADF computer, computer system, network, or software for the preparation, transmission, or receipt of messages, graphics, or content that is offensive based on any Protected Category.

You may not use PADF's computer, internet, and phone systems to engage in any communications that are in violation of the law or PADF policy, including, but not limited to, transmission of defamatory, obscene, pornographic, offensive, or harassing materials. Such use will be grounds for disciplinary action up to and including termination.

PADF expects that all employees will use care when handling equipment and other property to protect against damage, loss, and theft.

Respect for Copyrighted Works

PADF strongly supports the protection of copyrighted works. Employees are expected to respect copyrighted works in all activities related to electronic communication.

PADF purchases and licenses the use of computer software for business purposes. Unless authorized by the software developer, PADF does not have the right to reproduce such software for use on computers for which they are not licensed. You may use software only on local area networks or on multiple machines according to the software license agreement. PADF prohibits the illegal duplication of software and its documentation.

PADF employees are *not* permitted to install software programs on any PADF computer without the prior approval of the Chief Information Officer. Staff are not permitted to download executable software programs, shareware, utility programs, etc. from the internet. Send written requests to your immediate supervisor and the Chief Information Officer for software essential to complete your work responsibilities.

Mobile Devices

PADF will provide a cell phone if required. The cell phone must be requested by your direct supervisor and is only for conducting PADF business. While mobile devices, including cell phones, are a great benefit for many of our employees, this benefit must be used responsibly. All messages and materials transmitted to, received from, or stored on a cell phone used for PADF's business or on behalf of PADF are PADF's property. Employees are expressly advised that to prevent misuse, PADF reserves the right to monitor, intercept, review, and erase, without further notice, all content created on, transmitted to, received from, or stored on cell phones used for PADF purposes or on behalf of PADF.

When traveling internationally with a PADF phone, be mindful of additional charges and fees, and do your best to contain those costs. Please consult the IT team for ways to prevent such additional costs.

The use of PADF cell phones is prohibited while driving under any of the following circumstances, except where expressly permitted by law and with a "hands-free microphone connection":

- A PADF rental car is being driven.
- The car is being driven on PADF business.
- The car is being driven to or from work, or
- The phone call is being made for a PADF business purpose.

This prohibition applies only to the driver of the car. There is no prohibition against the use of cell phones or devices by passengers, so long as the phone or device does not prevent the driver from driving safely. Drivers who are using a hands-free wireless phone or device should nevertheless follow common sense precautions, such as dialing numbers only while the vehicle is stopped. PADF cell phones may not be used when driving in hazardous conditions (e.g., heavy rain, winter storms, heavy winds, or dangerous traffic).

On your last day of work you will be expected to return all PADF property, including the PADF cell phone issued to you. Employees should not delete, modify, or “wipe” any data from PADF-issued cell phones prior to their return. PADF may require reimbursement for the cost of lost or damaged cell phones.

Internet and Electronic Mail Usage

PADF provides you with internet access and electronic mail to help you perform your duties. PADF expects you to use these tools responsibly. Incidental use of the email system for personal communications is permitted, but only on your own time, if doing so does not interfere with your job responsibilities or PADF operations and does not cause any harm or embarrassment to PADF.

All emails sent or received from PADF accounts are the property of PADF. The organization has access to all equipment and reserves the right to access all information created, transmitted, or stored on its computers and systems. Passwords and security codes do not guarantee privacy, and PADF can bypass them. You should have no expectation of privacy in your use of PADF computers and communications systems. Do not prepare, store, or transmit any information that you do not want to be seen by PADF. Employees are reminded that all PADF’s policies apply to employee conduct involving computers and communications systems. Accordingly, while using PADF equipment, you may not engage in discriminatory conduct (including sexual harassment), access or maintain pornographic material, engage in unauthorized entry into another employee’s system or files, disclose confidential information to unauthorized persons, or engage in any conduct in violation of PADF’s policies. Do not use PADF equipment for personal activities such as web surfing, stock trading, or personal calls.

PADF reserves the right to monitor users’ access and disclose all such records at any time, without notification or permission. While PADF does not intend to monitor the email messages of its users without cause, you should be aware that this capacity exists. Email and internet messages are retained, even if you delete them. These records are subject to disclosure for audit purposes or to law enforcement agencies or other third parties through subpoena or other legal means.

Improper use of email (e.g., spreading offensive jokes or remarks), or improper internet use (e.g., excessive non-business use and/or accessing pornographic or other inappropriate websites) will not be tolerated. Employees found to be abusing their internet privileges may be subject to disciplinary action up to and including termination.

Upon hire as a PADF employee and on an annual basis, you must read this entire policy and sign the acknowledgment form stating that you have read and understood it.

Conflict of Interest Disclosure and Employee Acknowledgement PADF Global Code of Conduct and Safeguarding Policies

I have read and agreed to PADF's Global Code of Conduct and Safeguarding Policies regarding:

- **Anti-harassment, Anti-discrimination, and Anti-bullying**
- **Anti-Trafficking in Persons**
- **Protection Against Sexual Exploitation, Abuse and Harassment (PSEAH)**
- **Safeguarding Children and Communities**
- **Whistleblowing Policy**
- **Business Code of Conduct and Ethics**
- **Conflict of Interest**
- **Confidential Information**
- **Other Employment and Outside Activities**
- **Anti-corruption**
- **Social Media and Online Communications**
- **Computer Systems, Mobile Devices, Internet, and Electronic Mail**

Disclosure of Conflicts of Interest

Do you participate in any activity and/or relationship that may be construed as a conflict of interest as described in the PADF Global Code of Conduct or policies?

Yes

No

If so, please describe below:

To the best of my knowledge, I have no conflicts of interest or circumstances that interfere with my compliance with these policies, except those noted above.

I understand that PADF may, in its sole discretion, amend, supplement, modify, or eliminate any of these policies and may act with or without a policy previously in place. I further understand that nothing in this Global Code of Conduct is intended to create or should be construed to constitute an express or implied contract of employment or warranty of any benefits.

Signature

Date

Employee Name