



Global Code of Conduct

September 2023

**GLOBAL CODE OF CONDUCT
Employee Acknowledgement**

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

- I. ANTI-DISCRIMINATION AND ANTI-HARASSMENT**
- II. BUSINESS CODE OF CONDUCT AND ETHICS (INCLUDES FINANCIAL LIABILITY)**
- III. CONFLICT OF INTEREST**
- IV. OTHER EMPLOYMENT AND OUTSIDE ACTIVITIES**
- V. ANTI-CORRUPTION**
- VI. CONFIDENTIAL INFORMATION**
- VII. WHISTLEBLOWER STATUS**
- VIII. PROTECTION OF PADF BENEFICIARIES AGAINST SEXUAL EXPLOITATION AND ABUSE (PSEA)**
- IX. ANTI-TRAFFICKING IN PERSONS POLICY**
- X. SOCIAL MEDIA AND ONLINE COMMUNICATIONS**
- XI. COMPUTER SYSTEM, MOBILE DEVICES, INTERNET AND ELECTRONIC MAIL**

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 below or on the attached documents.

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.

Please also refer to the [Safeguarding Policies](#) adapted by PADF.

I agree to follow and adhere to these policies and any additional policies subsequently adopted by PADF.

If no conflicts or circumstances that interfere with compliance with these policies are noted below or attached, please check here.

Signature

Date

Employee Name

I. Anti-Discrimination and Anti-Harassment

Discrimination and Harassment Prohibited

PADF is committed to maintaining a work environment in which all individuals are treated with respect and dignity. It should be characterized by mutual trust and the absence of intimidation, oppression, and exploitation and should be free from all forms of discrimination and harassment 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, 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").

PADF will not tolerate any form of discrimination or harassment, including sexual harassment. Employees should be able to work and learn in a safe yet stimulating atmosphere. By educating employees and enforcing this policy, PADF will seek to prevent, correct, and discipline behavior that violates this policy.

This policy applies to all discrimination and harassment in our workplace, at a PADF-sponsored events, or at another location if it affects the workplace. It covers all employees of PADF, including applicants for employment as well as third parties, such as contractors, vendors, suppliers, and visitors ("PADF Third Party").

Sexual Harassment Defined

Because confusion often arises concerning the meaning of sexual harassment in particular, it deserves special mention. For purposes of this policy, "sexual harassment" includes unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when:

- Submission to such conduct is explicitly or implicitly made a condition of an individual's employment.
- Submission to or rejection of such conduct is used as the basis for employment decisions affecting the individual.
- Such conduct unreasonably interferes with an individual's work performance or creates an intimidating, hostile, or offensive working environment.

Some examples of conduct that may amount to sexual harassment include, but are not limited to:

- 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.
- Offensive and unwelcome conduct of a sexual nature, including sexually graphic, derogatory, or degrading jokes, spoken remarks or physical gestures; offensive or insulting comments transmitted by e-mail or another electronic messaging system; offensive or suggestive photos, videos, images, or graphics, whether physically present in the workplace or accessed over the Internet, or the possession of or use of sexually suggestive objects.
- Offensive and unwelcome physical conduct of a sexual nature, including the touching of another's body, touching or display of one's own body, or any similar conduct.
- 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.
- Unwelcome comments about appearance.

- Gender or sex-based pranks.

Sexual harassment need not be motivated by sexual desire to be unlawful and to be prohibited by this policy. Violations of this policy may lead to discipline, up to and including termination of employment.

Hostile Work Environment and Other Harassment Defined

For purposes of this policy, “other harassment” is defined as verbal or physical conduct that denigrates or shows hostility or aversion toward an individual based on any characteristic protected by law, that:

- Creates an intimidating, hostile, or offensive work environment.
- Unreasonably interferes with an individual’s work performance.

Some examples of such harassment are:

- Use of epithets or slurs.
- Behavior that mocks, ridicules, or mimics another’s culture, accent, appearance, or customs.
- Threats, intimidation, or hostile or offensive acts, including jokes and pranks, that focus on an individual’s Protected Category.
- The display anywhere on work premises or circulating in the workplace (including via email), of written or graphic material that denigrates or shows hostility or aversion toward a person or group because of a Protected Category.

This list of examples is not intended to be all-inclusive. Violations of this policy may lead to discipline, up to and including termination of employment.

Applicability

This policy as well as all the policies included in this Global Code of Conduct applies to all Employees and Others.

“Employees” refers to full-time, part-time, international, and national employees of PADF. “Others” refers to volunteers; board members and trustees; employees in partner agencies, sub-grantees or sub-awardees; those engaged on short-term contracts, such as consultants, fellows, interns, etc. in the U.S. or internationally; and any other individuals, groups, or organizations that have a formal or contractual (but not employment) relationship to PADF beneficiaries.

Complaint Procedure

PADF is committed to taking all reasonable steps to prevent discrimination and harassment and will make every reasonable effort to promptly and completely address and correct any discrimination and harassment that may occur. However, PADF cannot do so unless each employee immediately reports any incident of alleged discrimination and harassment to an appropriate supervisory employee.

If you believe that you—or someone at PADF—has been subjected to unlawful discrimination or harassment of any kind, you are responsible for reporting the discrimination or harassment immediately to your supervisor or Talent Management. PADF can only do something about this behavior if it knows about it. You may report violations of this policy:

- Directly via email or telephone to the Chief of Staff at PADF Headquarters in Washington, D.C., or to another senior member of the Talent Management team at headquarters.
 - If any of these leaders are involved, you should report directly to the Executive Director.
- You may also submit a concern directly to the PADF WhatsApp hotline +1(703)953-9241.
- Call or email through PADF’s hotline, managed by Safecall, 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. PADF staff should continue to report employment-related concerns through normal channels such as the Human Resources Representative or Country Directors, or to PADF's Executive Director, Chief of Staff, or 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 of Staff

Every report of discrimination and harassment will be investigated promptly and impartially, making every effort to maintain confidentiality consistent with the objectives and circumstances of the investigation. The complainant and the accused will be informed of the findings of the investigation. If PADF finds violations of this policy, it will take appropriate remedial or corrective action, up to and including termination of employment.

Upon hire and periodically during your employment with PADF, you will be required to read this entire policy and sign the acknowledgement form on the first page stating that you have read and understood it.

II. Business Code of Conduct and Ethics

PADF has an excellent reputation for conducting its business activities with integrity and fairness, in accordance with the highest ethical standards. Our success depends on the trust and confidence earned from our employees, clients, and stakeholders. We gain credibility by adherence to our commitments, display of honesty and integrity, and achievement of 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 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 a safety, fire prevention, health, or security rule, 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 any questions about this business code of conduct and ethics, or about what to do or not to 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, it is important to note that, if you cause financial damage to PADF by malice, culpable negligence, or failure to observe PADF By-Laws, financial rules and procedures, regulations, or other administrative provisions, you may be held personally responsible 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 and/or the Chief of Staff 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.

All employees who are declared liable should be personally accountable to PADF for the amount of 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 or several and apportioned according to the degree of each party's participation.

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

III. 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 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 of Staff, 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 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 is what allows you to benefit financially from another organization, this could be a conflict or the appearance of a conflict of interest that you should avoid at all times. If you are in doubt about what this means, speak with the Executive Director, Chief of Staff, 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 or Regional 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, whether or not the work is performed, or products created during standard working hours is considered "work for hire" and, therefore 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 invention 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 and all 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 product, 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 on the basis 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 with the explanation 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 the term of your contract, while employed by PADF, or within six months of leaving PADF.

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

IV. 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, it is important that PADF employees 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 also agree that you may not solicit or discuss employment or other relationship 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

You may be employed outside of PADF as long as you adhere to the requirements listed below. Outside employment shall 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 for, or leave early from, your job at PADF.
- Constitute a conflict of interest with PADF.

You are required to notify your supervisor and the Chief of Staff 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 the management of an industry or business, or have any financial interest therein if, by reason of your official position with PADF, it is possible for you to benefit from such association or financial interest. You should avoid conflicts of interest or the appearance of conflicts of interest at all times.

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

V. 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” in order 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 is available to assist employees to 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 hire to PADF and on an annual basis, you must read this entire policy and sign the acknowledgement form on the first page stating that you have read and understood it.

VI. Confidential Information

Never discuss confidential information concerning PADF to 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 product, 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 hire to PADF and on an annual basis, you must read this entire policy and sign the acknowledgement form on the first page stating that you have read and understood it.

VII. Whistleblower Status

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. 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. Examples of misconduct or wrongdoing include, but are not limited to, violations of PADF's policies (including, but not limited to, this Code of Conduct); plagiarism, violations of national, state or local laws; embezzlement, forgery; and fraudulent financial or donor reporting.

Reporting

The whistleblowing procedure is intended to be used for serious and sensitive issues. You may report such concerns, including those relating to financial reporting, unethical, or illegal conduct:

- Directly via email or telephone to the Chief of Staff at PADF Headquarters in Washington, D.C., or to another senior member of the Talent Management team 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 hotline +1(703)953-9241.
- Call or email through PADF's hotline, managed by Safecall, 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 Human Resources Representative or Country Directors, or to PADF's Executive Director, Chief of Staff, 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 of Staff

Illustrative Types of Concerns

The following is a non-exhaustive list of improprieties that you should report:

- Supplying false or misleading information on PADF financial or other public documents, including its tax return (Form 990).
- Providing false information to or withholding material information from PADF auditors or directors.
- Embezzlement, private inurement (i.e., PADF earnings inuring to the benefit of an individual) and private benefit (i.e., PADF assets used for personal gain or benefit).
- Violations of PADF's Conflict of Interest Policy.
- Payment for services or goods that are not rendered or delivered.
- Facilitating or concealing any of the above or similar actions.
- Violations of any other federal, state, or local laws.

Investigation

PADF will investigate and address all such reports. PADF's interest in conducting a rigorous investigation means it cannot promise complete confidentiality but will act as discreetly as reasonably possible. If, as a result of the investigation, PADF discovers a problem, it will promptly take corrective action as it deems necessary.

Any employee who intentionally files a false report of wrongdoing will be subject to disciplinary action, up to and including termination.

Reporting Without Fear of Retaliation

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 of Staff or other member of the senior management team at headquarters immediately.

Questions About This Policy

If you have any questions at all about this policy, about whether you should report an incident under this policy, or about PADF's commitment to a workplace free of discrimination and harassment, please speak with your supervisor. If you believe it is inappropriate for any reason to discuss the matter with your supervisor, please bring your questions to Talent Management.

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

VIII. Protection of PADF Beneficiaries Against Sexual Exploitation and Abuse (PSEA)

As defined by the United Nations Secretary General, "sexual exploitation" is any actual or attempted abuse of position of vulnerability, differential power, or trust for sexual purposes, including, but not limited to, profiting monetarily, socially, or politically from the sexual exploitation of another. "Sexual abuse" means the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.

PADF strictly prohibits sexual exploitation and abuse toward its beneficiaries, including harassment, exploitation, or abuse of any kind from employees; volunteers; board members and trustees; employees in partner agencies; those engaged on short-term contracts, such as consultants, fellows, interns, etc.; or any other individuals or groups or organizations that have a formal or contractual relationship to PADF. All of these persons and organizations are committed to the prevention and investigation of cases of sexual exploitation and sexual abuse of PADF beneficiaries and/or vulnerable members of the communities in which we work.

PADF employees; volunteers; board members and trustees; employees in partner agencies; those engaged on short-term contracts, such as consultants, fellows, interns, etc.; or any other individuals or groups or organizations that have a formal or contractual relationship to PADF must abide by the regulations issued by the United Nations Special Measures for Protection from Sexual Exploitation and Sexual Abuse¹ for United Nations staff and by the Inter-Agency Standing Committee Task Force on Prevention of Sexual Exploitation and Abuse Six Core Principles on Sexual Exploitation and Abuse,² as may be updated and amended from time to time and

¹ Extracted from ST/SGB/2003/13 Section 3 (original text and formatting preserved).

² Extracted from Inter-Agency Standing Committee Six Core Principles Relating to Sexual Exploitation and Abuse, updated September 2019 (original text and formatting preserved).

as follows:

UN Special Measures for Protection from Sexual Exploitation and Sexual Abuse, Section 3:

Prohibition of sexual exploitation and sexual abuse

3.1 Sexual exploitation and sexual abuse violate universally recognized international legal norms and standards and have always been unacceptable behaviour and prohibited conduct for United Nations staff. Such conduct is prohibited by the United Nations Staff Regulations and Rules.

3.2 In order to further protect the most vulnerable populations, especially women and children, the following specific standards which reiterate existing general obligations under the United Nations Staff Regulations and Rules, are promulgated:

(a) Sexual exploitation and sexual abuse constitute acts of serious misconduct and are therefore grounds for disciplinary measures, including summary dismissal;

(b) 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 defence;

(c) Exchange of money, employment, goods or services for sex, including sexual favours or other forms of humiliating, degrading or exploitative behaviour, is prohibited. This includes any exchange of assistance that is due to beneficiaries of assistance;

(d) Sexual relationships between United Nations staff and beneficiaries of assistance, since they are based on inherently unequal power dynamics, undermine the credibility and integrity of the work of the United Nations and are prohibited;

(e) Where a United Nations staff member develops concerns or suspicions regarding sexual exploitation or sexual abuse by a fellow worker, whether in the same agency or not and whether or not within the United Nations system, he or she must report such concerns via established reporting mechanisms;

(f) United Nations staff are obliged to create and maintain an environment that prevents sexual exploitation and sexual abuse. Managers at all levels have a particular responsibility to support and develop systems that maintain this environment.

3.3 The standards set out above are not intended to be an exhaustive list. Other types of sexually exploitive or sexually abusive behaviour may be grounds for administrative action or disciplinary measures, including summary dismissal, pursuant to the United Nations Staff Regulations and Rules.

Inter-Agency Standing Committee Task Force on Prevention of Sexual Exploitation and Abuse Six Core Principles on Sexual Exploitation and Abuse:

- 1. Sexual exploitation and abuse by humanitarian workers constitute acts of gross misconduct and are therefore grounds for termination of employment.*
- 2. 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 regarding the age of a child is not a defense.*
- 3. 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 due to beneficiaries.*
- 4. Any sexual relationship between those providing humanitarian assistance and protection and a person*

benefitting from such humanitarian assistance and protection that involves improper use of rank or position is prohibited. Such relationships undermine the credibility and integrity of humanitarian aid work.

5. *Where a humanitarian worker develops concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether in the same agency or not, he or she must report such concerns via established agency reporting mechanisms.*
6. *Humanitarian workers are obliged to create and maintain an environment which prevents sexual exploitation and abuse and promotes the implementation of their code of conduct. Managers at all levels have particular responsibilities to support and develop systems which maintain this environment.*

PADF's Commitment to Protecting Beneficiaries

Employees, board trustees, and other affiliates of PADF have a common commitment to the protection from sexual exploitation and abuse of its beneficiaries and the vulnerable communities in which we work. When PADF works through partners, they have a responsibility to meet minimum standards of protection for beneficiaries in their programs. Without a doubt, this commitment is one of the most important values that PADF believes in. Sexual exploitation and abuse are never acceptable.

This policy sets out common values, principles, and beliefs and describes the general steps we will take in meeting our commitment to protect PADF beneficiaries. It applies particularly to how we protect beneficiaries from abuse within our own organizations and within the partner organizations with which we work closely.

Applicability

This policy applies to all Employees and Others.

"Employees" refers to full-time, part-time, international, and national employees of PADF. "Others" refers to volunteers; board members and trustees; employees in partner agencies, sub-grantees or sub-awardees; those engaged on short-term contracts, such as consultants, fellows, interns, etc. in the U.S. or internationally; and any other individuals, groups, or organizations that have a formal or contractual (but not employment) relationship to PADF beneficiaries.

PADF Values, Principles, and Beliefs

All beneficiaries have equal rights to protection from abuse and exploitation. A "beneficiary" is defined as a person who receives assistance as part of humanitarian relief or development programs and/or is otherwise vulnerable due to the person's circumstances.

PADF will meet its commitment to protect beneficiaries from abuse through the following means:

- Awareness: Ensure that all Employees and Others are aware of the problem of sexual exploitation and abuse (SEA) and the risks to beneficiaries.
- Prevention: Ensure, through awareness and good practice, that Employees and Others minimize the risks to beneficiaries.
- Reporting: Ensure that Employees and Others are clear about steps to take when concerns arise regarding the safety of beneficiaries.
- Responding: Ensure action is taken to support and protect beneficiaries when concerns arise regarding possible abuse.

To meet these standards of reporting and responding, Employees and Others are expected to ensure that they take seriously any concerns raised; listen to and take seriously the views and wishes of beneficiaries; take positive steps to ensure the protection of beneficiaries who are the subject of any concerns; and support

beneficiaries, employees, or other adults who raise concerns or are the subject of concerns to act appropriately and effectively in investigating, or with Talent Management in cooperating, with any subsequent process of investigation.

How PADF Will Ensure that These Commitments Are Met

- PADF will provide appropriate training, learning opportunities, and support to ensure these commitments are met.
- PADF requires Employees and Others to abide by the PADF Global Code of Conduct, including its policy against discrimination harassment. All Employees and Others will have access to a copy of the Global Code of Conduct and this PSEA policy included therein.
- PADF will ensure each partner has a code of conduct that reflects regulations and guidance issued by the United Nations, such as the Inter-Agency Standing Committee Task Force's six core principles.
- Recruitment procedures will include criminal background checks to determine applicants' suitability for working with PADF and its beneficiaries.
- Orientation for Employees and Others will include briefing on SEA issues.
- Every office will display contact details for reporting possible SEA violations, and Employees and Others will receive that information.
- Systems will be established for the investigation of possible abuse once reported and to appropriate corrective actions. For countries with statutory reporting obligations, this will include activating statutory procedures.

PSEA Code of Conduct

All PADF Employees and Others agree to abide by this PSEA Policy, including this PSEA Code of Conduct. Employees and Others must never:

- Act in ways that may be abusive or may place beneficiaries at risk of abuse, including striking or otherwise physically assaulting or physically abusing beneficiaries.
- Develop relationships with beneficiaries that could in any way be deemed exploitative or abusive.
- Engage in physical or sexual relationships with beneficiaries.
- Behave physically in a manner that is inappropriate or sexually provocative.
- Use language, make suggestions, or offer advice that is inappropriate, offensive, or abusive.
- Act in ways intended to shame, humiliate, belittle, or degrade beneficiaries, or otherwise perpetrate any form of emotional abuse.
- Spend excessive time alone with beneficiaries, including allowing or inviting a beneficiary with whom they are working to stay overnight at their home or hotel room.
- Do things of a personal nature for beneficiaries that they can do for themselves.
- Condone or participate in the behavior of beneficiaries that is illegal, unsafe, or abusive.
- Discriminate against or show unfair differential treatment or favor to particular beneficiaries to the exclusion of others.

This is not an exhaustive or exclusive list. The principle is that Employees and Others should avoid actions or behavior that may constitute poor practice or abusive or potentially abusive behavior. It is important for all employees and others in contact with beneficiaries to:

- Be aware of and manage situations that may present risks.
- Plan and organize the work and the workplace so as to minimize risks.
- Ensure that a culture of openness exists to enable any issues or concerns to be raised and discussed.
- Ensure a sense of accountability among Employees and Others so that poor practice or potentially abusive behavior does not go unchallenged.
- Talk to beneficiaries about their contact with employees or others and encourage them to raise concerns.
- Empower beneficiaries: Discuss with them their rights, what is acceptable and unacceptable, and what they can do if a problem arises.

How to Report Sexual Exploitation and Abuse

Per PADF's Whistleblower Policy (Section VII), 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 investigation of the alleged activity. This includes PADF's PSEA Policy and PSEA Code of Conduct

PADF wants staff to feel comfortable reporting SEA. For situations in which anonymity is preferred, PADF offers a third-party service in the language of the country where the report originates. Please click [here](#) to find email addresses and telephone numbers for specific countries.

You may also submit a concern directly to the PADF WhatsApp hotline +1(703)953-9241.

PADF will investigate all reports of violations of this PSEA Policy and related behavior and take responsive action as appropriate. Any Employees found to have engaged in inappropriate or prohibited acts under this PSEA Policy against beneficiaries will be disciplined, up to and including termination of employment. PADF will also take appropriate action against Others (as defined under Applicability, above) found to have engaged in inappropriate or prohibited acts under this PSEA Policy against beneficiaries, up to and including termination of its agreements with any subcontractors, sub-awardees, or agents.

In the investigation of SEA reports, PADF abides by the following principles, in line with the United Nations guiding principles for PSEA:

- PADF places the human rights, interests, and needs of all victims at the center of our efforts and adhere to the principles of "do no harm," confidentiality, safety, and non-discrimination when responding to allegations of sexual exploitation and abuse as appropriate.
- A victim-centered approach guides PADF's SEA prevention and response, whereby victims are informed, participate in decision-making, and provide consent for possible use and disclosure of their information.
- In cases involving children, all decisions regarding the prevention and response to SEA allegations involving Employees or Others are guided by the best interests of the child and their right to participate and to be heard as appropriate.

PADF's commitment to protect beneficiaries from abuse is unwavering. You are responsible for reading and understanding this policy and are required to sign an acknowledgement that you have read and agreed to the policy committing to protecting beneficiaries from sexual exploitation and abuse.

Furthermore, upon hire to PADF and on an annual basis, you must read this entire policy and sign the acknowledgement form on the first page stating that you have read and understood it.

IX. Anti-Trafficking in Persons Compliance Policy

PADF developed this Anti-Trafficking in Persons Compliance Plan in accordance with the U.S. Government's zero-tolerance policy regarding trafficking in persons by government contractors and award recipients.

The purpose of the Anti-Trafficking in Persons Compliance Plan is to: (1) set out PADF's anti-trafficking in persons policies and procedures; (2) 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; (3) employ fair recruitment, wage, and housing practices; (4) 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; (5) prevent prohibited trafficking activity by suppliers, subcontractors, and sub-recipients, and monitor, detect, and terminate those who engage in such activities; and (6) establish PADF reporting requirements and remediation procedures.

PADF strictly prohibits its Employees and Others:

- Engaging in trafficking in persons.
- Procuring commercial sex acts.

- Using forced labor.
- 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.
- Using recruiters that do not comply with 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.

PADF employees who engage in any of the prohibited acts will be disciplined, up to and including dismissal. PADF will also take appropriate action against Others that engage in any of the prohibited acts, up to and including termination of existing relationships, agreements or contracts.

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

X. Social Media and Online Communications

Using social media can be a fun and rewarding way to share your life and opinions with family, friends, and co-workers. 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, micro blogs (such as Twitter), podcasts, bulletin boards, video sites (like YouTube or Skype), 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 responsible and appropriate use of social media, this policy provides guidelines on the use of social media in two distinct circumstances: (1) for use of social media personally ("for personal use,") and (2) for authorized business purposes on behalf of PADF ("for PADF business").

Although some guidelines apply to use of social media for both personal use and PADF business, others differ depending on the use of social media for personal or for PADF business purposes. You are expected to pay careful attention and adhere to the relevant guidelines.

PADF expects that all employees and representatives will 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 all 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.

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

- What you publish through social media is public and a reflection on you—and potentially on PADF. Others can store and back it 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 an 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 information published online, whether or not it is on PADF’s network or using PADF email, if it is in violation of PADF’s policies.
- Anything you publish via social media must respect and comply with all 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, and suppliers, as well as 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 any 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 Communications department. These situations, if they arise, can be more complex to handle than they may appear, so 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, you should refer the requesting party to the Communications Manager, 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 Strategic Communications Lead. 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.

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 in question must either be on PADF's approved list or approved in advance 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 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! Once a post is out there, 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 acknowledgement form on the first page stating that you have read and understood it.

XI. Computer System, 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. This equipment includes, but is not limited to, computers (including all files, email, and internet data), mobile and landline telephones, laptops, tablets, filing cabinets, desks, and work or office space. All such 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, should not receive, and must not 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 are 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 use care when handling its 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 that you believe is essential to complete your work responsibilities.

Mobile Devices

PADF will provide a cell phone if you must have one to conduct PADF business and based on a request from your direct supervisor. 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, in order 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 travelling 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 such 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":

- 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 car passengers, so long as the phone or device is not used in such a way to prevent the driver from driving safely. Drivers who are permissibly using a hands free wireless phone or device should nevertheless follow common sense precautions, such as dialing numbers only while stationary and stopping all usage in hazardous driving.

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

Internet and Electronic Mail Usage

PADF provides access to the internet and electronic mail to assist you in the performance of your job 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 of 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 acknowledgement form on the first page stating that you have read and understood it.

More About PADF

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. www.padf.org

PADF’s core values. “**H-E-A-R-T**” = Honesty, Excellence, Accountability, Respect, and Teamwork.

Diversity. PADF is strong because we are diverse. We actively seek a diverse applicant pool and encourage candidates of all backgrounds to apply. PADF does not discriminate on the basis of ability, age, gender identity and expression, national origin, race and ethnicity, religious beliefs, sexual orientation, or criminal record. We welcome all kinds of diversity. Our employees include people who are parents and nonparents, the self-taught and university educated, and from a wide span of cultures, languages, socio-economic backgrounds, and perspectives on the world.