



**Search *for***  
**Common Ground**

# CODE OF CONDUCT

Approved by the Board of Directors on November 2, 2018

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Search for Common Ground (“Search”) strives for the highest standards of ethical and professional behavior. We are committed to act at all times in a manner consistent with our organization’s policies, as well as the laws of the United States and Belgium and those of other jurisdictions where we work around the world. The Code of Conduct (“Code”) applies to all employees, interns, and volunteers acting on behalf of Search (referred to herein as “affiliates”). Search affiliates in every Search organization worldwide must adhere to this Code. Search affiliates are expected to perform their duties in good faith, with honesty and integrity, and in furtherance of the mission, goals, and values of our organization. We respect protection of internationally-recognized human rights, and are not complicit in abuses. The reputation and success of Search depends on affiliates’ adherence to the principles, policies, and standards set forth below.

Any affiliate who violates this Code will be subject to appropriate corrective action, ranging from a disciplinary warning to termination. Search may take the required corrective action necessary to prevent inappropriate affiliate behavior before such behavior reaches the level of legally actionable behavior. Affiliates found to have violated the Code of Conduct and such violation resulted in dismissal will not be eligible for rehire by any part of the Search organization.

To the extent any official law or regulation limits or prohibits the application of any part of this Code of Conduct, then the part that is not compliant can be amended only for the specific geographic area and after approval by the President or his/her designate.

## 1. Professional Responsibilities

All affiliates are expected to conduct their duties and responsibilities in a professional and ethical manner. Affiliates are responsible for complying with organizational policies, as well as all applicable federal and state laws (for the United States) or country and/or local laws (for employees in country offices). Therefore, affiliates must familiarize themselves with all codes, policies, regulations, and any updates from the organization. Affiliates must hold themselves accountable for all actions and behaviors while conducting their duties and responsibilities with Search. Affiliates are expected to attend work at their scheduled times and locations (unless authorized for leave), perform their duties and assignments in a competent manner, dress professionally, and use Search resources responsibly. Employees are also accountable for attending required meetings, and maintaining the appropriate professional qualifications for their work, including the renewal of any required certification(s).

## 2. Search’s Core Values, Dignity and Respect

Search’s Core Values, described in more detail on the [Values page of the Policies Site](#), are the “cultural norms” for how to behave, how to interact with and treat each other. They guide how Search operates, makes decisions, supports the staff, interns and partners. Search’s FIVE CORE VALUES are described below:

**COLLABORATION:** We create diverse teams to work together on our shared interest.

**AUDACITY:** We set bold visions and seek creative ways to accomplish them.

**TENACITY:** We work hard and we persist despite the obstacles.

**EMPATHY:** We see the dignity in every person and honor that dignity in how we work.

**RESULTS:** We each contribute to achieving the mission of Search

Search is committed to providing a work environment in which all individuals are treated with dignity and respect. Affiliates should treat their colleagues and people who attend Search sponsored programs and events (“participants”) with dignity and respect. Search is committed to creating a work environment where affiliates:

- respect and value the contributions of all regardless of status or role in the organization;
- use conflict management skills, together with respectful and courteous verbal communication, to effectively manage disagreements;
- recognize and embrace individual and cultural differences;
- prevent any form of stereotyping or bias over one another;
- recognize that differing social and cultural standards may mean that acceptable behavior to some may be perceived as unacceptable to others and adapt accordingly;
- if they are in leadership positions, be role models for others and clearly define expectations for how employees are to treat each other.

### 3. Policy Against Discrimination, Bullying, and Harassment

Search affiliates should not engage in discrimination, bullying, or harassment. Search has zero tolerance for sexual misconduct, including sexual harassment, exploitation, or abuse of any kind.

#### 3.1 Non-Discrimination

Discrimination is treating or proposing to treat an individual or group unfavorably, unfairly, or unequally based on race, color national origin, sex, religion or belief, age, disability, marital status, sexual orientation, gender identity or expression, pregnancy, pregnancy-related condition, military or veteran status, citizenship status, genetic information, being a victim of domestic violence or assault, or any other characteristic or status protected by law. Discrimination by or against affiliates based on any protected characteristic or status will not be tolerated by Search. Search’s non-discrimination policy also applies to all beneficiaries and participants of Search programs. Search is an equal opportunity employer, and this policy extends to all aspects of the employment relationship, including, but not limited to, decisions involving an employee’s compensation, recruitment, terms and conditions of employment and privileges of employment.

#### 3.2 Anti-Bullying and Anti-Harassment

Bullying includes, but is not limited to, offensive, intimidating, malicious, or insulting behavior, or an abuse or misuse of power through means that undermine, humiliate, denigrate, or injure the recipient.

In general terms, workplace harassment is unwanted conduct, where a person is subjected to behavior that is repeated, unwelcome, and unsolicited; the person considers it to be offensive, intimidating, humiliating, or threatening; and/or a reasonable person would consider it to be offensive, humiliating, intimidating, or threatening.

Workplace harassment and bullying can be committed by an employer, worker, co-worker, group of coworkers, partner, supplier, or donor. When such conduct is because of a protected characteristic it is considered unlawful in the United States and in many other countries and additional protections may be offered by law.

Workplace harassment covers a wide range of behaviors and can include unwelcome physical, verbal, or non-verbal conduct. Some examples include:

- making/sending offensive messages (e.g. via email, telephone or other means);
- racist, sexist or sectarian remarks including family, sexuality, gender identity, culture, education, disability;
- psychological harassment such as isolating or spying on a person;
- use of offensive language, gossip, and slander;
- displaying images, graffiti, flags, emblems, or any other offensive material and visual displays on posters or computer screensavers;
- significantly impairing the person's work in any way such as inappropriately withholding information or removing content;
- humiliating a person through gestures, sarcasm, and insults (especially in front of others);
- physically harming a person in the workplace such as pushing, shoving, tripping, or grabbing;
- any form of attacking causing or intending of bodily harm, or any threat thereof .

### **3.3 Sexual Harassment**

Sexual Harassment is a specific and serious form of harassment. Sexual harassment is defined as unwanted sexual advances, requests for sexual favors, sexually motivated physical contact, and gender or sex-related conduct or communication when, for example (i) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; (ii) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or (iii) such conduct has the purpose or effect of creating an intimidating, hostile, or offensive work environment.

Sexual harassment can be directed towards one person, groups of people, or towards everyone and can occur as a one-off incident or be a pattern of harmful behavior. It makes no difference if the victim of the sexual harassment is of the same or opposite sex as the harasser. The effect of sexual harassment is to violate the dignity of another person and to create an intimidating, hostile, degrading, humiliating, or offensive environment for them and others.

Sexual harassment can take many forms, including but not limited to:

- verbal comments of a sexual nature, such as remarks about an employee's appearance, questions about their sex life or offensive jokes, discussion of sexual activities, requests or demands for sex or sexual favors, sexual epithets, gossip, or comments;
- non-verbal activities such as displaying pornographic or explicit images in the workplace or on one's computer, unwelcome leering, whistling, sexual gestures or written comments of a sexual nature which are offensive or inappropriate, sexually explicit voicemails, texts, or emails;
- physical actions such as unwanted physical contact, touching, making unwelcome sexual advances, making reprisals, threats of reprisal, or implied threats of reprisal following a rejection of a sexual advance, and assault (this includes attempts and threats to do these things).

It does not matter if the statement or conduct is “innocent” or without explicit sexual meaning or overtones. It only matters that the statement or conduct is unwelcome and that it has a discriminatory meaning or implication. Just because someone does not object to inappropriate behavior in the workplace at the time, it does not mean that they are consenting to the behavior. When addressing allegations of sexual harassment, Search is concerned with the impact of the behaviors on the complainant, not the intention of the person doing it.

Sexual harassment does not generally include occasional compliments of a socially acceptable nature. It also does not include consensual relationships as long as there is not a direct reporting relationship or a relationship between a supervisory employee and a non-supervisory employee. Commonly accepted fraternization among employees, defined as conduct of a socially acceptable, friendly, and congenial nature that adds to team building or a pleasant work environment is not considered sexual harassment. When fraternization goes beyond what reasonably can be deemed behavior of a socially acceptable nature in the workplace and/or becomes unwelcome, it may become sexual harassment.

**See Section 11 Reporting and Investigating Violations below for more information on how to report discrimination, bullying, harassment, and sexual harassment.**

## 4. Prevention of Sexual Exploitation and Abuse (PSEA)

Search is committed to protecting the safety and well-being of our program participants, particularly women, vulnerable adults, and children. Search maintains zero tolerance for exploitation, sexual abuse, child abuse, sexual abuse or exploitative acts or threats by our affiliates or anyone associated with the delivery of our programs or services and takes seriously all complaints of misconduct brought to our attention. The policies on Prevention of Sexual Exploitation and Abuse (PSEA) and Child Safeguarding are designed to extend protection from our own personnel to the people and communities we serve. Staff are obliged to create and maintain an environment that prevents sexual exploitation and abuse. Managers at all levels have a particular responsibility to support and develop systems that maintain this environment.

### 4.1 Sexual Activity with Search Program Participants

Search strictly prohibits all affiliates from engaging in any form of sexual activity with participants.

## 4.2 Transactional Sex

In line with the Inter-Agency Standing Committee (IASC) Core Principles on PSEA, to prevent sexual exploitation and abuse from occurring, Search strictly prohibits all affiliates from buying sex. Search affiliates are therefore not allowed to pay for sex with money, employment, goods, or services — including goods and services intended as aid to people in need. They must not use promises of these things to make other people accept any kind of behavior that humiliates or exploits them. They should not make access to benefits and services contingent upon receiving sexual favors of any kind, solicited or unsolicited. This includes paying or offering money for sex with a prostitute.

## 4.3 Sex Trafficking and Forced Labor

Search has a zero-tolerance policy with respect to trafficking of persons. Affiliates are prohibited from engaging in trafficking of persons, procuring commercial sex acts, or using forced labor in the performance of a project.

## 4.4 Sexual Activity with Employees of Other Organizations

Search often works with other organizations including donors, vendors, and sub-awardees (“Partners”). We expect these relationships to be based on mutual respect and dignity. Search strictly prohibits affiliates from engaging in sexual activity with staff from partners where this is an abuse of power. An affiliate engaged in a relationship with staff at a Partner must take the following actions:

- declare the relationship as soon as possible to her/his line manager and HR in writing, even if the relationship is at an early stage and may not continue and provide notice in writing if the relationship ends;
- behave professionally and conduct the relationship in a way that does not impact Search;
- ensure work decisions are not made based on the relationship;
- ensure that the relationship does not lead to fraudulent or corrupt behaviors, favoritism or nepotism.

## 5. Child Safeguarding

Child safeguarding is to protect anyone under 18 years of age from harm resulting from maltreatment whether it is physical, verbal, sexual, emotional or psychological or as a result of neglect. Child abuse is never acceptable. Search is committed to providing a safe environment for children by holding all affiliates to high standards of conduct and implementing policies and procedures to prevent and respond to instances of child abuse, exploitation, or neglect.

Search strictly prohibits all affiliates from engaging in sexual relationships or any other kind of inappropriate physical or sexual behavior with a child, regardless of country specific age of consent. This includes paying for sex, with any person under 18 years old or under the local age of sexual consent (where higher) and marrying any person younger than 18. This applies to all Search Affiliates regardless of the age of consent locally, and mistaken belief in the age of the child is not a defense.



Affiliates must comply with the following standards regarding conduct with children:

- Search strictly prohibits all affiliates from engaging in any form of child abuse, exploitation, or neglect or putting a child at risk of abuse or exploitation.
- Search expects all affiliates to treat all children with respect regardless of their race, color, gender, language, religion, opinions, nationality, ethnicity, social origin, property, disability, or other status.
- Search affiliates must comply fully with host country and local child welfare and protection laws including those in relation to child labor or with international standards, whichever gives greater protection.
- Affiliates must comply with the [International Convention on the Rights of a Child](#) and with the [USAID Child Safeguarding Standards](#).
- Affiliates must avoid being placed in a position where they are alone with a child or children with whom they come into contact as part of their work with Search.
- Affiliates must consider the risk of harm and whether there is any possibility a child may be abused or exploited when assessing the appropriateness of any physical or verbal contact, including in the design of Search programs.
- Affiliates are prohibited from exposing children to pornography, and must comply with applicable laws, regulations, or customs regarding the photographing, filming, or other image-generating activities of children.
- Affiliates are additionally required to disclose any convictions or child-related investigations to which they are subject.

## 6. Communication and Political Activity

### 6.1 Writing and Publishing

Affiliates should obtain permission from their supervisors before publishing work written on behalf of Search or as a representative of Search. All Search employees are expected to communicate in a respectful way, expressing a common ground viewpoint which is consistent with the organization's mission and values and global approval matrix.

### 6.2 Use of Social Media

This Code of Conduct applies to communication through social media such as Facebook and Twitter. Affiliates who post about Search through a personal social media account should identify their connection to the organization and conduct themselves in a manner consistent with Search values and global policies. Please see Search Social Media Policy for additional information (as of Q2 2022 this new policy is in development).

### 6.3 Political Activity

The work Search does is possible, in part, because Search takes an impartial position in the conflicts in which it works and does not engage in political campaigning or lobbying. When acting on behalf of Search, Search affiliates

should maintain this position. It is important that affiliates do not interact with the community in a way that is contrary to the stated mission of the organization, especially when acting on Search's behalf. This extends to the use of online social media, such as Facebook and Twitter.

No Search funds, property, assets, services or facilities may be used, directly or indirectly, to participate or intervene in any political campaign on behalf of, or in opposition to, any candidate for public office, or contributed to or used by any political party, campaign, political action committee or public office-holder. This includes Search-supplied computers, phones, and internet.

No United States Government funds may be used, directly or indirectly, to influence or attempt to influence: (1) the outcome of any federal, state or local election, referendum, initiative or similar procedure; or (2) the introduction, enactment, or modification of federal or state legislation (commonly called "lobbying").

Search employees, with the approval of appropriate management and head of Global Affairs and Partnerships, may provide technical or factual information, analysis and research results to legislators or their staffs in response to documented requests for such information. The prohibition on lobbying does not apply to the activities of Search Global Affairs and Partnership staff, which are not charged to the United States government, and which are conducted within the relevant legal guidelines.

Prohibitions on political activity by Search employees do not extend to:

1. making voluntary personal contributions to political candidates, organizations or causes;
2. engaging in political activities on an employee's own time, off Search premises, and at the employee's own expense;
3. expressing views on legislative or political matters; or
4. participating in any other lawful political events or activities; however, any political activity or contribution that might create even the appearance of a contribution or endorsement by Search is prohibited unless approved in advance.

Political promotions and/or lobbying are prohibited in the workplace, and in the conduct of duties and responsibilities.

## 7. Use and Protection of Search Property

Affiliates are responsible for the proper use and protection of Search property.

### 7.1 Use of Resources

It is the responsibility of all affiliates to use Search resources in an appropriate and responsible manner. Resources, both tangible and intangible, are only to be used by authorized personnel for designated, work-related purposes. Such resources include, but are not limited to, electronic devices, monetary funds, Internet and Intranet access, and databases. When using any organizational funds, affiliates must avoid purchasing any unnecessary or unreasonable items. Except for limited use for essential personal communications, Search property, facilities and

physical resources, including computers, phones and fax machines, may not be used for any non-Search business. Affiliates should be mindful of the fact that Search retains the right to access, review, monitor and disclose any information transmitted, received or stored using Search's electronic equipment or systems, and affiliates have no expectation of privacy in connection with these systems and equipment.

Any employee found to be engaging in or attempting theft or other improper use or diversion of Search property, including funds, credit or debit cards, bank accounts, documents, equipment, intellectual property, personal property of other employees, or any other items of value, will be subject to immediate discharge and possible criminal proceedings. Employees have a responsibility to report any such activities to Search management.

## **7.2 Confidential or Proprietary Information**

Search Confidential or Proprietary Information should never be given to an outside firm or individual without appropriate prior authorization. As a condition of working with Search, all affiliates must agree not to disclose any Search Confidential or Proprietary Information during or after employment to anyone outside Search, except as authorized by Search, or as otherwise required by law. "Search Confidential or Proprietary Information" includes, without limitation, any information regarding Search's operations, products, services, strategies, research, policies, systems, budgets, proposals, finances, programs, plans, donor or business relationships, or any other information not generally known to the public that is learned by the affiliate as a consequence of working with Search. Any improper transfer or disclosure by an affiliate of material containing Search Confidential or Proprietary Information, even though it is not apparent that the affiliate has personally gained by such action, constitutes unacceptable conduct. Participation in such a practice may result in disciplinary action, up to and including termination of employment, and possible legal action. Releasing Confidential or Proprietary Information to any external parties, without prior written supervisory approval, jeopardizes both the organization's competitive position and its credibility with partners. To be safe, assume that information is confidential, unless the departmental supervisor makes a specific indication that the information can be publicly disseminated.

Search seeks to work in an open and collaborative manner and as such, affiliates may have access to internal information of a confidential or sensitive nature. Dissemination of such information should be limited to those affiliates properly and directly involved in work or deliberations relating to it. Confidential or sensitive internal information includes proposals, budgets, marketing plans, costs and other internal financial data and similar information. It is a requirement of working with Search that affiliates maintain confidentiality both internally and externally. Those affiliates whose job responsibilities entail regular or frequent access to sensitive, confidential or proprietary information concerning Search employees (such as personnel records and employee compensation), accounting and finances, confidential communications, passwords and other information intended for limited internal access or distribution are expected to be especially vigilant in maintaining the strict confidentiality of this information and be diligent in ensuring compliance with relevant privacy laws and regulations.

Affiliates who leave Search are required to return all documents (including any hard copies or electronic versions) that contain Search Confidential or Proprietary information.

Notwithstanding the above, nothing herein shall prevent any affiliate from reporting possible violations of federal or state law or regulation to any governmental agency or entity, or making other disclosures that are protected under the whistleblower provisions of federal or state law or regulation. Affiliates are hereby notified that they do not need the prior authorization of Search to make any such reports or disclosures and are not required to notify the Company that they have made such reports or disclosures. In addition, as set forth in 18 U.S.C. s 1833(b), an individual shall not be held criminally or civilly liable under any federal or state trade secret law for the disclosure of a trade secret that is made in confidence to a federal, state or local government official, either directly or indirectly, or to an attorney, and is made solely for the purpose of reporting or investigating a suspected violation of law, or that is made in a complaint or other document filed in a lawsuit or other proceeding if such filing is made under seal.

### **7.3 Intellectual Property**

Affiliates agree that any design, idea, data, work of authorship, invention, discovery, improvement, enhancement, trade secret or other development (each, a “Development”) conceived, developed, discovered, authored or reduced to practice (either alone or jointly with others) while working with Search (each a “Search Development”), including all associated copyright, patent, trademark, and other intellectual property rights of any nature, will be the sole and exclusive property of Search and/or its nominees, assigns, or partners. All Search Developments will constitute “works for hire” to the extent permitted under applicable law. Affiliates agree to assign and hereby irrevocably assign to Search any and all right, title, and interest they have, may have, or may acquire in all Search Developments, including all associated intellectual property rights. To the extent affiliates have any rights in any Search Developments that cannot be so assigned, including any moral rights, affiliates unconditionally and irrevocably waive all such rights. Affiliates agree to assist Search, or its nominees or assigns, in every lawful way to perfect, obtain, maintain, and enforce any and all intellectual property rights and other rights and protections relating to all Search Developments, including by executing all relevant documents.

### **7.4 Copyright and Trademarks**

Any work developed, designed or authored by or on behalf of Search or by any of its employees and authorized for external distribution, including any websites or other material posted on the Internet, must bear a copyright notice in the form prescribed by the United States federal copyright law. All brands and logos developed by Search must be registered as trademarks in any country in which they will be used in connection with products or services. Affiliates should consult with the Communication Department concerning trademark registration.

## 7.5 Maintenance of Books and Records

Affiliates must follow legal and organizational procedures by appropriately documenting and recording organizational information. Information must be documented and/or recorded truthfully and accurately in accordance with regulations and organizational policies.

When preparing reports, budgets, statements, invoices, time sheets or other documentation for government bodies, donors, or contracting agencies, employees must see to it that information provided is accurate, complete, clear, and presented in a manner designed to enlighten and not to mislead. Under no circumstances may an affiliate make a claim for payment for amounts not properly due to Search for work performed or goods or services provided, or any other false statement, representation or certification on behalf of Search, in either written or oral form. This includes falsification of time sheets or other time records, cost reports, expense reports, pricing proposals, certifications relating to cost or pricing data, or requests for payment.

Search employees responsible for financial and/or personnel recordkeeping must see to it that such records are developed and maintained carefully and accurately in accordance with all applicable legal requirements and Search procedures, and that Search funds are scrupulously expended and accounted for. Access to such records should be limited to those employees who require it to carry out their job responsibilities.

Documents related in any way to an ongoing or potential investigation of Search by a government agency or to any other official proceeding must not be destroyed, discarded or altered.

## 8. Conflict of Interest

Affiliates should avoid situations in which their personal financial or other interests could conflict with, or even appear to conflict with, the interests of Search or their responsibilities to conduct Search business fairly, impartially, and in compliance with this Code. Conflicts of interest arise when an individual's position or responsibilities at Search present an opportunity for personal gain or profit for that individual or someone they are close with, or where the employee's interests are otherwise inconsistent with those of Search. Some apparent conflicts of interest may be resolved through disclosures and authorized waivers. A conflict of interest may arise in any number of situations and it is impossible to describe each and every instance. Any affiliate who is aware of a conflict of interest, is concerned that a conflict might develop, or has questions about this policy or whether a particular situation would be a conflict of interest, is required to discuss the matter with the Head of the Global Human Resources Department or the Sr. Manager, Policy & Internal Compliance promptly.

While not exhaustive, some areas of potential conflict of interest are addressed below:

1. **Financial Gain:** An affiliate may not participate in the selection, award, or administration of a Search contract, subcontract, grant, sub- grant, loan or other funding mechanism if the affiliate, a member of his/her immediate family, or business associate has any current or prospective interest, financial or otherwise, including current or prospective employment, in an entity being considered or selected for an award.

2. **Other Potential Financial/Representational Conflicts:** If an affiliate, spouse, domestic partner or any other member of an affiliate's immediate family has or is considering a financial or organizational interest (as an employee, consultant, business partner, investor, borrower, lender, beneficiary, or paid or unpaid board member or trustee) in a Search competitor, contractor, consulting firm, customer, vendor, donor, or funding recipient, the employee should promptly disclose this interest to the head of the Global Human Resources department. (Investments in the stock of public companies are exempt from this restriction, unless the size of an investment puts the affiliate in a position to influence the company's decision-making.) If Search determines that the interest disclosed presents an actual or potential conflict with the interests of Search, the affiliate may be directed to take appropriate steps to avert or resolve such conflict.
3. **Outside Employment or Board Membership:** An employee of Search who wishes to (i) perform services for, or accept employment from, anyone other than Search, (ii) engage in any other business or professional activity with an outside entity, or (iii) accept a significant leadership position, including board membership, in another organization (with or without compensation), should do so only after obtaining prior written approval from his/her supervisor. Employees may not use Search time or resources to further non-Search business. At no time may an employee's outside employment or other activity (i) interfere in any way with the fulfillment of the employee's duties to Search; (ii) adversely affect the quality of the employee's work; (iii) compete in any way with Search; (iv) compromise Search's reputation; or (v) imply sponsorship or support by Search of an outside affiliation. All payments (gratuities or honorariums) received by a member of staff for outreach (speeches, opinion pieces, commentaries, etc) should be paid into the general funds of the organization.
4. **Gifts and Favors:** An affiliate involved in a procurement process or any process involving selection of vendor, supplier, partner, participant or employee, should not be in a position where his/her actions may constitute or could be reasonably perceived as reflecting favorable treatment to an individual or entity by accepting any gifts or any hospitality or other similar considerations. An affiliate shall neither solicit nor accept a gift, or any form of gratuity, from anyone who has submitted a proposal to do business with Search. The use of Search funds or assets or the offering of private funds or assets for any unlawful, improper, or unethical purpose including, but not limited to, improper gifts, payments, or offerings of anything of value, including to foreign officials, is strictly prohibited.

Gifts valued at more than USD 25.00 or equivalent are prohibited. This is a maximum limit. Where this limit can be considered extravagant in a local setting, it is the responsibility of local management to set lower local limits and communicate them clearly.

5. **Bribery and Corruption:** Search prohibits all directors, officers and employees, as well as third parties acting on behalf of Search, from taking any action to authorize, give, promise, or offer cash or anything of value, either directly or indirectly, to any government official for the purpose of securing any improper advantage or obtaining or retaining business or a favorable business relationship. Likewise, Search

prohibits any payments to any third party or intermediary, while knowing that all or a portion of such money or thing of value will be offered or given to any government official for the purpose of securing any improper advantage obtaining or retaining business or a favorable business relationship.

Fraud is any wrongdoing that involves deception, misrepresentation, impropriety, or concealment to gain something of value at the detriment of another. Fraudulent acts can include, but are not limited to: theft; misuse of the organization's cash or other assets; false claims for expenses; forgery; billing for services not performed, including falsifying timesheets; presentation of false, incorrect or incomplete documentation which has as its effect the misappropriation of funds; inflating charges for services or products; and financial corruption: abusing one's position while employed at the organization for inappropriate financial gain, acts to obtain an undue benefit or advantage, and including any form of bribery, nepotism or cronyism. Fraud does not necessarily have to result in a loss to the Organization.

**Globally, all forms of fraud or corruption are strictly prohibited.**

Please see [Anti-Fraud and Anti-Corruption Policy](#) for more information. for more information.

6. **Use of Confidential or Proprietary Information:** Affiliates may not use any Search Confidential or Proprietary Information for personal financial gain or to compete with Search.

Search seeks to serve the community as a whole rather than only serving special interest groups. The appearance of a conflict of interest could cause embarrassment to the organization and jeopardize its credibility. Any exceptions to this policy for an affiliate must be approved by the Head of Internal Controls.

## 9. Close Personal Relationships

Search prohibits all affiliates from having a sexual relationship with people whom they manage or supervise and, in the case of the most senior managers, any junior staff in their direct management line and/or other differential power dynamics (i.e. other managers with specific decision-making powers that affect another individual, such as procurement or budget authority).

Search seeks to avoid potential internal conflicts of interest posed by close personal relationships between associates. 'Close personal relationships' include marriage, domestic partnership or other committed relationships, close familial relationships (i.e., parent-child, sibling), or consensual romantic or sexual relationships.

Search's policy does not prohibit associates from beginning relationships with each other outside the unequal power dynamics explained above, but all affiliates engaged in or beginning relationships with other affiliates must: (1) declare their relationships as soon as possible in informing their line managers or the HR Representatives even if the relationships are at early stages and may not continue; (2) the same is expected if relationships end;

and (3) behave professionally and conduct their relationships in respect of the Code of Conduct and in a way that does not impact Search work.

## 10. Safe and Drug Free Workplace

Search maintains safe and drug free workplaces and worksites.

### 10.1 Workplace Safety

Search has an obligation to provide safe and healthy working conditions. Search's goal is to ensure the safety of all affiliates, increase productivity, and decrease property damage. Threats to workplace safety can include; defective or misplaced equipment, difficult working conditions (e.g. inadequate lighting, extreme cold or heat, etc.), or employees who exhibit signs of aggressive or violent behavior (e.g. under the influence of alcohol and/or illegal drugs, have weapons, are fighting and/or are conducting horseplay). All employees are responsible for their part in maintaining a safe work environment and for reporting any potential problems **immediately** to their managers or to the security officer for their office.

### 10.2 Violence

Acts or threats of violence by Search affiliates will not be tolerated. Any instances of violence or threats of violence, in any form, including threats to do bodily harm or property damage, directed in any way towards another affiliate or program participant must be reported **immediately** to management or the responsible security officer.

### 10.3 Substance Abuse and Alcohol

Search is firmly committed to providing employees with a safe workplace and promoting high standards of health. Reporting to work drunk or under the influence of illegal drugs (including misuse of prescription medication) or alcohol is strictly prohibited. Search will not be responsible for acts committed and/or injuries resulting from an employee's excessive consumption of alcohol and/or illegal use of drugs. Possession, use, or sale of illegal drugs while on (or off) the job, including rest and meal periods, is a dischargeable offense, and may result in criminal prosecution. Any illegal drugs found will be turned over to the appropriate law enforcement agency(ies).

Following the consumption of alcohol above the legal limit employees should not drive any vehicles. Following consumption of **any** amount of alcohol employees may not (i) drive Search-owned or leased vehicles; or (ii) drive any vehicle containing Search employees, contractors, volunteers, vendors, clients, customers, program partners or participants, board members, or donor personnel. All Search behavior standards and policies, including the sexual harassment policy, are in effect both on and off Search premises, including all Search-sponsored events, and apply whether or not alcohol consumption is a contributing factor.



## 11. Reporting and Investigations of Violations

Affiliates who become aware of any suspected, planned, or actual violation of this Code of Conduct (including if an affiliate feels that he or she is being pressured to act in an unethical manner) should immediately report this to his/her supervisor, senior management, or the head of the Global HR Department. Supervisors and managers should promptly convey such reports to the head of the Global HR Department. Affiliates are expected to cooperate fully with any investigation by Search or a governmental authority into a possible violation.

If an employee is uncomfortable reporting activity he/she believes to be improper through internal Search channels, or is not satisfied with the response received, such activity may be reported on a confidential basis or submitted anonymously to EthicsPoint (see Section 12 *Whistleblower Policy* below).

Sensitivity to confidentiality is a priority, and every effort will be made to protect an affiliate's identity (if he or she wishes) when reporting an issue. However, in some cases, it may be impossible to protect someone's privacy due to demands of conducting an investigation or certain legal requirements.

Any affiliate who is unsure whether a situation violates any applicable law, rule, regulation or Search policy should discuss the situation with his/her supervisor, senior management, or the head of the Global HR Department. Ethical questions can be difficult to understand and analyze, and there is no such thing as a dumb question. Affiliates should never hesitate to ask a question or report a concern.

### 11.1 Reporting Sexual or Other Harassment, Exploitation, or Abuse

Any affiliate who becomes aware of any inappropriate conduct, including sexual or other prohibited harassment, sexual exploitation or abuse, whether affecting themselves or others, has an obligation to report the matter immediately to his/her supervisor, senior management, or the head of the Global HR Department.

An affiliate, who has a complaint against his/her supervisor, the executive leadership, Board members, or who otherwise is not comfortable reporting violations to the Code of Conduct, sexual or other harassment via established internal channels, may report the activity confidentially or anonymously to EthicsPoint. (See Section 12 *Whistleblower Policy* below.) Affiliates are strongly urged to report any misconduct before it becomes severe or pervasive.

Any supervisor or manager who receives a complaint of possible sexual or other prohibited harassment, exploitation, or abuse should promptly contact the head of the Global Human Resources Department so that an investigation may be initiated in a timely manner.

All complaints of sexual or other prohibited harassment will be investigated promptly and thoroughly. Where appropriate, Search may use outside experts to investigate complaints of harassment. Search will make every effort to protect the confidentiality of employees lodging complaints or participating in investigations under this

policy. However, Search cannot guarantee complete confidentiality, since an effective investigation may not be possible without revealing certain information to the alleged harasser and/or potential witnesses.

Affiliates suspecting or reporting allegations of exploitation and abuse should refrain from discussing their reports or allegations with anyone other than Search management personnel, those who are conducting the investigation and where applicable with the law enforcement authorities to whom the report is made. Discussing allegations with anyone else may put the alleged victim and other program participants at risk. Furthermore, it may impair or impede an investigation.

No affiliate will suffer retaliation for reports of harassment if made in good faith. Search encourages any employee to bring questions regarding this policy and its implementation to the head of the Global HR Department.

### 11.2 Reporting Complaints Externally

Affiliates should be aware of the following external reporting options and practices:

1. **Harassment:** The D.C. Office of Human Rights and the United States Equal Employment Opportunity Commission (EEOC) investigate and prosecute complaints of prohibited harassment in employment.
2. **Sexual Exploitation and Abuse:** Search affiliates should notify local law enforcement, child protection authorities, or social services, if they believe circumstances warrant it (such as protecting the child's safety, preventing future harm) or if they believe any law was broken.
3. **Other External Reporting by Search:** On receipt of an internal complaint, Search will take appropriate remedial action including but not limited to notifying law enforcement and cooperating with criminal investigation and prosecution where appropriate. Search will also comply with required donor reporting guidelines regarding allegations.

## 12. Whistleblower Policy and No Retaliation

Search urges affiliates, beneficiaries and participants to report any violations of this Code of Conduct, suspected financial or accounting impropriety, or illegal or unethical business behavior without fear of retribution. Affiliates also may report any information that they reasonably believe is evidence of any of the following: gross mismanagement of a federal contract or grant; gross waste of federal funds; abuse of authority relating to federal contracts or grants; a substantial and specific danger to public health or safety or a violation of law, rules, or regulations related to a federal contract or grant (including the competition for a contract or grant). Reporting avenues for such violations include: a member of Congress or a representative of a congressional committee; an Inspector General who has oversight over contracts awarded or on behalf of the federal agency concerned in the contract or grant; the Government Accountability Office (GAO); a federal employee responsible for the contract or grant oversight at the relevant agency; an authorized official of the Department of Justice or other authorized federal agency; a court or grand jury; a management official or other employee of the contractor, subcontractor

or subcontractor grantee or sub-grantee who has the responsibility to investigate, discover or address misconduct. Reports may be made in accordance with Section 11 *Reporting and Investigations of Violations* above.

If an affiliate is uncomfortable reporting activity he/she believes to be improper through internal Search channels or is not satisfied with the response received, such activity may be reported on a confidential basis or submitted anonymously to EthicsPoint, the outside firm retained by Search for this purpose, using the contact information below. EthicsPoint will be responsible for passing on reports they receive to Search management or the Search Board so that the appropriate actions may be taken to resolve concerns raised. If a complaint is made through EthicsPoint about an individual whom might otherwise receive the report, the service will route the complaint to another manager or the Board as appropriate.

**No Retaliation:** No affiliate, beneficiary or participant who reports a suspected violation under this policy, provides information to a law enforcement official or government agency, or assists in the investigation of a suspected violation will suffer harassment, retaliation or discrimination of any kind, even if a subsequent investigation determines that no violation occurred, provided the affiliate report is made in good faith and with reasonable belief in its accuracy.

**Whistleblower Hotline Information:** EthicsPoint may be contacted through an online form or by phone. EthicsPoint supports all of the languages commonly spoken at Search, and offers many local and international calling options. Go to <https://sfcg.ethicspoint.com> to find the phone numbers or to use the online reporting form.

Complaints of harassment, retaliation or discrimination in violation of this policy should follow the reporting procedures outlined above, and will be promptly investigated. If an investigation results in a determination that there has been retaliation or other prohibited action against an affiliate, participant or beneficiary, appropriate corrective action will be taken.

Affiliates are expected to exercise sound judgment to avoid baseless allegations. An affiliate who knowingly or recklessly makes an allegation or disclosure that proves to be unsubstantiated may be subject to discipline, up to and including dismissal.

Reports by affiliates of violations or suspected violations, as well as the identity of whistleblowers, will be kept confidential to the extent possible, consistent with the need to conduct a thorough investigation.

### 13. Waivers, Amendment

Search is committed to continuously reviewing and updating our policies and procedures. Therefore, this Code of Conduct is subject to modification. Any amendment or waiver of any provision of this Code of Conduct must be approved by the President.

# ACKNOWLEDGMENT

I hereby acknowledge that:

- I have received a copy of the Code of Conduct;
- I have read, understood, and agree to adhere to the standards of conduct contained in the Code of Conduct; and I will report any action that appears inconsistent with these standards to my supervisor, the senior management, the head of the Global Human Resources Department, or through EthicsPoint.

Signature: \_\_\_\_\_

Name (Printed or typed): \_\_\_\_\_

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