



Search *for*
Common
Ground

CODE OF CONDUCT

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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 those of all jurisdictions where we work around the world (including United States and Belgium). The Code of Conduct (“Code”) applies to all employees, officers, interns, volunteers, and agents acting on behalf of Search (referred to herein as “affiliates”). Search affiliates in every Search office or entity 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. All Search affiliates must comply with the basic values such as respect for human dignity, freedom, democracy, equality, the rule of law and human rights, including the rights of minorities¹. 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 -following the policy detailed in the relevant Employee Handbook. Search may take the required corrective action necessary to prevent inappropriate affiliate behavior before such behavior reaches the level of legally actionable behavior.

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 Chief of Staff or their designate.

In addition to this Code, for Search Employees, further policies are outlined in the Global Employee Handbook. If there is any conflict between our Global Employee Handbook and this Code, this Code shall prevail. If there is a conflict between the local handbook and the Global Employee Handbook or the Code, the local handbook shall prevail.

Search for Common Ground reserves the right to revise, modify, delete, or add to any policies, procedures, work rules, or benefits stated in this Code. However, any such changes must be in writing. Subject to applicable law, we also reserve the right to change compensation or benefit plans at any time, with or without notice. In addition, Search will resolve all questions of policy interpretation and remains free to decide in all cases whether and how to apply these policies to any particular set of circumstances.

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 state, country and/or local laws (for country offices). Therefore, affiliates must familiarize themselves with all relevant codes,

¹ [Reference](#)

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.

2. Search's Core Values, Dignity and Respect

Search's Core Values 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 bring together people representing different opinions, perspectives, and experiences to work together on our shared interests.

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 promotes work culture 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. Search is committed not

only to responding to incidents of harassment, but is also attempting to proactively identifying and mitigating risks of violence and harassment in all work-related contexts.

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/ birth/ descent, language, sex, religion or belief, age, disability, marital status, civil status, sexual orientation, gender identity or expression, pregnancy, pregnancy-related condition, health condition (current or future), military or veteran status, political opinion, social origin, citizenship status, genetic information, physical characteristics, being a victim of domestic violence or assault, individual membership of a trade union, wealth / property status, or any other characteristic or status protected under applicable laws. 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 and benefits, recruitment & selection, terms and conditions 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 many of the countries and jurisdictions where Search works 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. 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 Open Door, Reporting and Grievance Policy* below for more information on how to report discrimination, bullying, harassment, and sexual harassment.

4. Safeguarding: Protection Against Sexual Exploitation and Abuse (PSEA)

Search is committed to protecting the safety, dignity 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 Protection from 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’s policy does not prohibit associates from beginning relationships with staff at a Partner organisation outside the risk of unequal power dynamics, but all affiliates engaged in or beginning relationships with other staff at a Partner must take the following actions:

- declare the relationship as soon as possible to her/his line manager and P&C 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 legally protected 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 all applicable donor 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.

Please see Search’s Safeguarding Policy for more details.

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 authorization matrix. Search Employees who are writing and/ or publishing on behalf of Search should also see section 5.3 of the Global Employee Handbook on “Confidential and Proprietary Information.”

6.2 Use of Social Media

This Code of Conduct applies to communication through social media such as Facebook, and X. 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.

6.3 Media Relations

For guidance on working with the media, please see the head of Search's Communications Team.

6.4 Lobbying Activity

Search may communicate and engage with government officials and employees on policy matters if consistent with Search's charitable purposes and if in compliance with relevant tax and lobbying laws and regulations.

No United States Government funds, nor any funding or requests originating outside of the United States, 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.

In the event that other donors impose similar restrictions, Search shall comply with those requirements within the scope of those grants.

Further, all advocacy, policy, and external relations activities must strictly comply with the Foreign Agents Registration Act in the US or in countries where Search operates. Search for Common Ground and its affiliates shall not appear before any U.S. government official specifically to make a case on behalf of a foreign entity's (including other Search entities) interest or position relating to policy matters, administration of law, or issues of public interest, nor shall Search for Common Ground function, directly or indirectly as a foreign entity's representative or agent to the US public at large. Search for Common Ground and its affiliates will not take any action which might jeopardize Search for Common Ground status as a bona fide independent nonprofit institution.

Search employees, with the approval of appropriate management, may provide technical or factual information, analysis and research results to legislators or their staff in response to documented requests for such information.

6.5 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. 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 X.

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 the internet.

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 in one's personal capacity; 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.

Political promotions 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. Please see Search's IT Acceptable Use Policy for more information.

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 IT Policies

Search affiliates must ensure they are in full compliance with all prevailing Information Technology Policies at all times. These cover topics spanning from Acceptable Use, Record Retention, use of AI applications and more. Each policy is described in detail within the Global Employee Handbook, including links to the policies.

7.3 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, timesheets 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 timesheets 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.

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 People & Culture 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 to the head of the Global People & Culture or to the CD or RD who must promptly pass the report to the head of the Global People & Culture 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:** Employees: please see Outside Employment section of Global Employee Handbook
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.
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, including after the end of their engagement with Search, may not use any Search Confidential or Proprietary Information for personal financial gain or to compete with Search.
7. **Representation and Honoraria:** Affiliates who undertake outreach activities (including speeches, publications, opinion pieces, commentaries, or similar engagements) in their capacity as representatives of Search do so as part of their professional duties. As such, any payments, gratuities, or honoraria received in connection with these activities must be declared and transferred to Search. Affiliates may not retain such payments for personal benefit, as these engagements form part of their compensated role within the organization.

Search seeks to build multipartial coalitions 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 Chief of Staff.

For Affiliates working under EU Awards: The Affiliate as impartial and faithful adviser - absence of conflict of interest: the affiliate must at all times act impartially and as a faithful adviser in accordance with the code of conduct of its profession. It must refrain from making public statements about the project or services without the contracting authority's prior authorisation. It may not commit the contracting authority in any way without its prior written consent. The affiliate must refrain from any relationship likely to give rise to a conflict of interest compromising its independence or that of its personnel.

9. Close Personal Relationships

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.

Affiliates may not supervise or exercise decision-making authority over individuals with whom they are in a romantic or sexual relationship.

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 P&C 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's work.

Where a personal relationship creates an actual or perceived power imbalance, Search will take appropriate measures to eliminate the conflict of authority. Such measures may include reassignment of supervisory or decision-making responsibilities, reporting line adjustments, or other structural changes. The objective is to protect both individuals and the integrity of the workplace. Failure to promptly disclose such relationships will be treated as grounds for disciplinary measures.

10. Health, Safety & Security

Search maintains safe and drug free workplaces and worksites.

10.1 Safety

Search is committed to maintaining a safe, healthy, and productive work environment for all affiliates. All affiliates are responsible for their part in maintaining a safe work environment. Please see Search's Safety & Security Framework for additional Safety & Security Policies

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

Please see the [Drug & Alcohol Policy](#).

11. Open Door, Reporting and Grievance Policy

Search maintains an **open door policy**, encouraging affiliates to raise questions, seek guidance, or voice concerns at any time. There are no “dumb” questions, and no affiliate should ever hesitate to ask or report a concern. 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 P&C Department. Supervisors and managers should promptly convey such reports to the head of the Global P&C 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.

All grievances will be investigated promptly, thoroughly, and impartially in line with Search’s internal procedures, applicable law, and principles of fairness and due process. Individuals involved in an investigation will be informed of the concerns raised and given an opportunity to respond. Affiliates are expected to cooperate in good faith with any investigation carried out by Search or a governmental authority.

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 P&C 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 P&C 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 People & Culture (P&C) Department so that an investigation may be initiated in a timely manner.

All complaints of sexual or other types of 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 P&C Department.

11.2 Reporting Complaints Externally

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

1. **Harassment:** Many jurisdictions offer a labor board or equivalent who will investigate harassment complaints if requested. See each jurisdiction for the relevant agency².
Contact local labor boards or relevant national human rights commissions as relevant in your country of work.
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.

² In the US: The D.C. Office of Human Rights (or the relevant State's equivalent) and the United States Equal Employment Opportunity Commission (EEOC) investigate and prosecute complaints of prohibited harassment in employment.

In Belgium: Federal Public Service Employment, Labour and Social Dialogue (FPS Employment) for workplace harassment (including sexual harassment, moral harassment).

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 contract or grant; gross waste of donor funds; abuse of authority relating to contracts or grants; a substantial and specific danger to public health or safety or a violation of law, rules, or regulations related to a contract or grant (including the competition for a contract or grant).

Reports may be made in accordance with Section 11 *Reporting and Investigations of Violations* above.

Any suspected or actual improper, illegal, or unethical conduct (including if an affiliate feels that he or she is being pressured to act in an unethical manner) should immediately be reported on a confidential basis on EthicsPoint, the externally hosted service retained by Search for this purpose, using the contact information below. Reports may be made anonymously to the extent anonymous reporting is permitted in the country at issue. EthicsPoint will be responsible for passing on reports they receive to designated Sr. P&C Managers, who alerts the appropriate member of Search management or the Search Boards so that the appropriate actions may be taken to resolve concerns raised. If a complaint is made through EthicsPoint about an individual who might otherwise receive the report, the service will route the complaint to another Sr. P&C manager.

Alternatively, affiliates who become aware of any suspected, planned, or actual violation of this Code of Conduct may also report this to his/her supervisor, senior management, or the head of the Global P&C Department under Search's Open Door policy. Supervisors and managers should promptly convey such reports to the head of the Global P&C Department. Affiliates are expected to cooperate fully with any investigation by Search or a governmental authority into a possible violation.

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.

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 Chief of Staff.

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 People & Culture Department, or through EthicsPoint.

Signature: _____

Name (Printed or typed): _____

Date: _____