



# The IRC Way

INTEGRITY | ACCOUNTABILITY | SERVICE

Our Standards of  
Professional Conduct

# CONTENTS

Leadership Message .....	<b>1</b>
Our Values .....	<b>2</b>
Guiding Principles.....	<b>2</b>
Our Shared Responsibilities in Upholding This Code.....	<b>3</b>
Our Commitments to Our Colleagues .....	<b>4</b>
Our Commitments to Our Clients .....	<b>6</b>
Our Commitments to Our Donors .....	<b>8</b>
Our Commitments to Our Suppliers .....	<b>10</b>
Our Commitments to Our Partners.....	<b>12</b>
Our Commitments to Our Organization .....	<b>14</b>
Our Commitments to Society .....	<b>16</b>
Getting Help .....	<b>18</b>
How to Spot Ethical Dilemmas.....	<b>18</b>
Your Duty to Speak Up .....	<b>18</b>
Channels for Raising Concerns .....	<b>19</b>
How to Raise Concerns .....	<b>20</b>
Ethics and Compliance Hotline.....	<b>21</b>
Anonymity and Confidentiality.....	<b>21</b>
Anti-Retaliation Policy .....	<b>22</b>
Responsiveness .....	<b>22</b>
Enforcement .....	<b>23</b>

# Leadership Message

Dear Colleagues:

## **I am pleased to share with you *The IRC Way: Our Standards for Professional Conduct.***

The IRC Way has long stood as our Code of Conduct, describing our three core values of **Integrity**, **Service** and **Accountability**, and the undertakings that flow from them. These values and undertakings unite IRC staff around the world and keep our programs firmly directed toward the well-being of our clients while meeting the expectations of our donors as responsible stewards of their resources.

The aim of this document is to ensure that we carry out our work following the ethical and moral principles that support our humanitarian calling. Policies alone are not enough if they cannot be translated into action. That's why our Code has been expanded to include practical steps you can take to follow the IRC Way, and examples of concerns that should be escalated for proper response.

The Code is not intended to make you an expert on every issue, but rather to help you spot risks, obtain guidance, and make good choices. We must constantly be alert to gaps between policies and practices and work to close them. This document is designed for staff but should also be shared with partners, donors and other supporters, so they can see the standards to which we are committed.

Please join me in affirming our commitment to the IRC Way, and in promoting the values of the IRC in all that we do.



Sincerely,

**David Miliband**  
**President and CEO**



## Our Values

### Integrity

We are open, honest and trustworthy in dealing with clients, partners, co-workers, donors, funders and the communities we affect.

### Accountability

We are accountable—individually and collectively—for our behaviors, actions and results.

### Service

We are responsible to the people we serve and the donors who enable our service.

## GUIDING PRINCIPLES

We endorse the *Code of Conduct for the International Red Cross and Red Crescent Movement and NGOs in Disaster Relief*. We are guided by its core humanitarian principles, including humanity, impartiality, neutrality, and independence. As such:

- **The prime motivation for our response to disaster is to alleviate human suffering amongst the most vulnerable members of society. We recognize our obligation to provide humanitarian assistance wherever it is needed;**
- **Our aid is given regardless of the race, creed or nationality of the recipient, and without adverse distinction of any kind. Aid priorities are calculated on the basis of need;**
- **Our aid will not be used to further a particular political or religious standpoint, nor will we tie the promise, delivery, or distribution of assistance to the embracing or acceptance of a particular political or religious creed; and**
- **We shall endeavor not to act as instruments of government policy. We will never allow ourselves to be used to gather information of a political, military, or economically sensitive nature for government or other bodies that may serve purposes other than those which are strictly humanitarian.**

We also affirm and enforce human rights consistent with the U.N. *Universal Declaration of Human Rights*, the *Convention on the Rights of the Child*, and the *UN Secretary General's Bulletin on the Protection from Sexual Exploitation and Abuse of Beneficiaries*.



# Our Shared Responsibilities in Upholding This Code

Upholding this Code is a responsibility shared by all involved in delivering on the IRC's mission. It applies to all IRC directors, officers, employees, interns, volunteers, incentive staff and partners who work on behalf of the IRC.

## Individual Responsibilities

You are responsible for becoming familiar with the standards of conduct that apply to your job. You will be doing your part when you:

- **Stay informed** by learning the standards of conduct that apply to your role and participating in ethics and compliance training sessions.
- **Seek guidance** and consult with others when the appropriate course of action is unclear.
- **Stand firm** by resisting pressure to compromise our standards or cut ethical corners to meet an objective.
- **Raise concerns** if something doesn't seem right.

## Manager Responsibilities

If you manage or supervise others, you have been placed in a position of trust. To maintain that trust, you should always:

- **Lead by example** and be a positive role model to others.
- **Promote awareness** of the IRC's standards and make sure those you supervise are equipped with the knowledge and resources they need to comply with them.
- **Monitor conduct** of those you supervise and take responsibility for activities that occur under your supervision.
- **Be responsive** to anyone who raises an ethics or compliance concern and make sure matters are resolved in a fair and appropriate manner.





# Our Commitments to Our Colleagues

The IRC is committed to ensuring safe and secure conditions for all workers, regardless of position or location, and to maintaining a work environment that promotes staff well-being, resilience, health and productivity.

## You Uphold the IRC Way When You:

- ✓ Treat all colleagues with dignity and respect.
- ✓ Make employment decisions based on an individual's abilities and merits, not personal characteristics unrelated to the job.
- ✓ Respect the rights of all individuals.
- ✓ Provide reasonable accommodations for persons with disabilities or special needs.
- ✓ Reject any form of violence or abuse of power.
- ✓ Stay aware of safety and security concerns, follow local security protocols, and stop any work that becomes unsafe.
- ✓ Safeguard the confidentiality of personal information.

## You Should Avoid:

- X Judging individuals based on factors unrelated to work.
- X Off-color jokes, offensive comments, derogatory e-mails, or sexually explicit images.
- X Working while impaired by alcohol or illegal substances.
- X Inappropriately disclosing employees' information, including personal information.

## You Should Report:

- ▲ Unwanted, inappropriate or disrespectful sexual advances or harassment.
- ▲ Bullying, perceived threats, intimidation, favoritism, belittlement, verbal or physical outrages.
- ▲ Situations that threaten the safety, security or well-being of staff.
- ▲ Hostility to individuals due to race, religion, gender, gender identity, sexual orientation, disability, veteran status or other characteristic protected by law.

**QUESTION:** *I have heard a colleague of mine speak very disrespectfully about the women we work with. He only does this when there are no women around, and he's just joking around, but he does it frequently. It makes me uncomfortable. What should I do?*

**ANSWER:** If you feel comfortable doing so, take the person aside and explain that you feel his words are offensive. If you don't feel safe doing that, or if he doesn't change his behavior after you speak with him, follow the procedures outlined in the "Getting Help" section of this Code.

**QUESTION:** *Last week, our manager asked us to make a field visit to a particular location. When I told her that security has designated the area off-limits due to safety concerns, she suggested we go anyway because there are clients there in need. What should I do?*

**ANSWER:** The safety of our staff is paramount, and security establishes local protocols with this in mind. If you are feeling pressured to compromise safety standards, follow the procedures outlined in the "Getting Help" section of this Code.



### **Relevant IRC Policies and Guidance:**

- Equal Employment Opportunity Policy
- Harassment Free Workplace Policy
- Accommodation Policy
- Substance Use in the Workplace Policy
- Workplace Violence Policy
- IRC Global Safety and Security Policy
- Confidentiality Policy
- Security and safety protocols







# Our Commitments to Our Clients

The IRC helps people whose lives and livelihoods are shattered by conflict and disaster to survive, recover and gain control of their future. This requires our commitment to further their well-being and act with honor in carrying out the vital humanitarian role that has been entrusted to us.

## You Uphold the IRC Way When You:

- ✓ Respect the dignity, values, history, religion and culture of those we serve.
- ✓ Select clients according to need, in line with program specifications, without regard to race, creed, nationality or other distinction.
- ✓ Protect clients from all forms of abuse, including sexual exploitation and human trafficking activities.
- ✓ Exercise special care to safeguard children.
- ✓ Respect confidentiality, abide by data-protection protocols, and share personal information about clients on a need-to-know basis in line with donor rules.
- ✓ Portray clients as dignified human beings in any images used in IRC communications, and use images only of individuals who have provided informed consent.
- ✓ Ensure IRC research involving human subjects is properly approved before it begins.

## You Should Avoid:

- X Recruiting clients to work for IRC staff in a personal capacity (e.g., as domestic workers).
- X Engaging in any forms of intimidating, humiliating, degrading or aggressive behavior towards clients.
- X Physically punishing or disciplining clients.
- X Sexual activity or intimate relationships of any kind with clients of any age.
- X Transactional sex regardless of local laws that may permit it.
- X Coercing clients to sell or relinquish relief items.

## You Should Report:

- ▲ Exploitation of clients in any form.
- ▲ Corrupt or biased decisions to include or exclude clients.
- ▲ Abuse of power or position in the delivery of humanitarian assistance.
- ▲ Inappropriate disclosure of confidential information related to clients.



**QUESTION:** *I like to support refugee owned businesses so I am using one of our client's home-based child care. Is this okay?*

**ANSWER:** It would normally be acceptable for staff to patronize legitimate businesses owned by clients if they choose. However, the terms/prices offered to IRC staff should be the same as those offered to the wider public.

**QUESTION:** *I happen to know that a client is using false information to gain refugee status. While she does not qualify as a refugee, I know she is fleeing a very difficult life at home. Do I need to say anything?*

**ANSWER:** Yes, you should raise your concern as outlined in the “Getting Help” section of this Code. While it may feel tempting to “look the other way,” this would not be the right thing to do.

**QUESTION:** *We were on a field trip last week, spending the night away from home. I have good reason to believe one of my colleagues hired a prostitute during the trip. What should I do?*

**ANSWER:** This would be a violation of the IRC's standards, and you should follow the procedures outlined in the “Getting Help” section of this Code.



### **Relevant IRC Policies and Guidance:**

- Beneficiary Protection from Exploitation and Abuse Policy
- Child Safeguarding Policy
- Combatting Trafficking in Persons Policy
- Confidentiality Policy
- Open Information Policy
- Institutional Review Board Procedures Guide for Researchers



### **Further Reading:**

- Code of Conduct for the International Red Cross and Red Crescent Movement and NGOs in Disaster Relief
- U.N. Universal Declaration of Human Rights, the Convention on the Rights of the Child
- U.N. Secretary General's Bulletin on the Protection from Sexual Exploitation and Abuse of Beneficiaries.

# Our Commitments to Our Donors

Our donors provide the resources that make our work possible, and we must be responsible stewards of those resources. We are committed to following the regulations and terms established by our institutional donors, as well as the expectations of all donors that the funding they provide serves clients efficiently and effectively.

## **You Uphold the IRC Way When You:**

- ✓ Understand donor rules that apply to performance and accountability.
- ✓ Ensure time sheets, expense reports, advance liquidations and other financial documents are accurate.
- ✓ Select partners able to deliver the best outcomes for clients and monitor their work appropriately in line with donor rules.
- ✓ Safeguard the confidential and proprietary information of institutional donors and the personal privacy data of individual ones.
- ✓ Inform donors of any errors in reported information, and strive for transparency.
- ✓ Conduct grant writing, fundraising, solicitation and marketing activities honestly and with integrity, in compliance with all applicable laws.
- ✓ Be truthful and forthcoming in all statements about the IRC and its performance.

## **You Should Avoid:**

- X Noncompliance with grant requirements or improper use of funding.
- X False time and effort, expense, or cost reporting.
- X Using existing grant funds to cover the expense of soliciting other grants without donor approval.
- X Exaggerating or distorting program needs, costs, client numbers or results.
- X Manipulating the selection, unauthorized use or inadequate monitoring of local partners.
- X Distorting claims about another organization's services in comparison to our own.
- X Gathering political, military or economically sensitive information on behalf of any donor for purposes other than humanitarian.
- X Accepting gifts from donors derived from or associated with illegal, criminal or fraudulent activity.

## **You Should Report:**

- ▲ Falsification of time, expense or cost reports.
- ▲ Fraudulent registration of clients.
- ▲ Theft or diversion of aid or resources.
- ▲ Improper fundraising practices.

**QUESTION:** *I know certain costs, like alcohol or entertainment costs, are unallowable on grants. Can I code them to “sundry” so it will not stand out on the financial report?*

**ANSWER:** No, you may not misclassify an expense so that it can be paid from a remaining budget line or charge any unallowable cost to any budget line item. Unallowable costs incurred by the office should be charged to unrestricted funds only.

**QUESTION:** *It is close to the end of a grant and I've just received significant purchase requests for computer equipment to spend out the remaining budget. Should I sign off on the purchases in order to submit a fully spent grant report?*

**ANSWER:** No, you should not make major purchases at the end of a grant so that they can be paid for from a remaining budget line.

**QUESTION:** *The program I work with has a target of reaching 50 percent women. The team is registering women as clients to make the numbers look good in reports, but in practice we are delivering program services to their husbands, not directly to the purported female clients. What can I do?*

**ANSWER:** You should raise this concern as described in the “Getting Help” section of this Code.



### **Relevant IRC Policies and Guidance:**

- Confidentiality Policy
- Fiscal Integrity Policy
- Organizational Gift Solicitation and Acceptance Policy
- Open Information Policy
- IRC program manuals, standard operating procedures, and other guidance documents as relevant to duties
- Supply Chain standard operating procedures
- IT policies governing equipment and data protection
- Finance manuals



# Our Commitments to Our Suppliers

Achieving good value for our purchases requires high integrity throughout our supply chain. We are committed to free and fair competition among suppliers, to the support of suppliers who share our adherence to ethical and responsible practices, and to the eradication of fraudulent or corrupt practices by those seeking improper gain from aid intended for clients.

## **You Uphold the IRC Way When You:**

- ✓ Disclose any actual or perceived “conflicts of interest” in a procurement—that is, when personal interest may interfere with the promotion of the IRC’s interests.
- ✓ Ensure good value when designing programs and buying goods and services.
- ✓ Follow procurement policies, including policies related to purchase requests, bid notices, bid analysis, contracting and supplier due diligence.
- ✓ Treat qualified suppliers and their representatives fairly and equally.
- ✓ Observe strict confidentiality with supplier information, prices, terms and conditions.
- ✓ Provide suppliers with full and clear explanations when rejecting bids.
- ✓ Maintain segregation of duties related to the request, approval and verification of purchases.
- ✓ Discuss relevant procurement policies established by government or institutional donors at grant meetings.
- ✓ Determine whether export licenses are required or restrictions apply before procuring any good, software or technology that is governmentally controlled or connected to a country where exports and imports are regulated.

## **You Should Avoid:**

- X Sharing information unequally to suppliers during the bidding process.
- X Revealing confidential information of one supplier with another supplier.
- X Accepting offers of anything of value (including gifts, favors, entertainment, bribes or kickbacks) that create or appear to create improper influence or unfair advantage.
- X Accepting inferior or substitute goods or services that do not meet specifications.

## **You Should Report:**

- ▲ Biased tender specifications, bidding documents or supplier pre-qualification.
- ▲ Bid rigging, collusion or other unfair practices among suppliers.
- ▲ Inadequate supplier due diligence.
- ▲ Transactions with parties involved in terrorist activities, child labor exploitation, human rights abuses, unsafe or unreasonable working conditions, or the illegal manufacture, supply or transportation of weapons.
- ▲ Requests to make a payment to a name other than the contracted party.



**QUESTION:** *A potential IRC supplier just invited me to dinner. Can I go?*

**ANSWER:** Yes, accepting meals from suppliers is usually acceptable provided those meals: 1) could not reasonably be seen as lavish or an attempt to influence a particular decision or action; 2) occur infrequently (e.g., no more than twice per year); 3) take place in respectable venues; 4) do not violate any laws; and 5) would not embarrass the IRC if publicly disclosed.

**QUESTION:** *We've just gone through the supplier qualification process but we skipped the site visits to vendors. My colleague made up the information that we submitted on that part of the forms. What should I do?*

**ANSWER:** Falsifying information about supplier due diligence is not acceptable. You should follow the procedures outlined in the “Getting Help” section of this Code.

**QUESTION:** *The product we received from a supplier uses a much lower quality of material than what we ordered. There doesn't seem to be a good reason for it, but someone must have authorized it. Should I just ignore this?*

**ANSWER:** No, you should raise this concern as described in the “Getting Help” section of this Code. While the product may be different for valid reasons, we never condone substitution with an inferior product.



### **Relevant IRC Policies and Guidance:**

- Fiscal Integrity Policy
- Global Mandatory Document Retention Policy
- Procurement manuals



### **Further Reading:**

- USAID Office of Inspector General Publication: Fraud Indicators
- USAID Office of Inspector General Publication: Fraud Prevention and Compliance—A Pocket Guide for the Humanitarian Middle East Crisis Response



# Our Commitments to Our Partners

Working in partnership with local, national and international civil society organizations, as well as state and private-sector entities, is fundamental to the IRC's mission. We are committed to promoting effective partnerships that enable the IRC to pursue its strategic goals, resulting in more effective, responsive and durable assistance that reaches more people.

## **You Uphold the IRC Way When You:**

- ✓ Promote partnerships based on accountability, transparency, respect, equity and inclusion.
- ✓ Select partners capable of responsible implementation and ensure that they receive the support necessary to meet established performance standards.
- ✓ Give partners full credit for the role they play in achieving program outcomes.
- ✓ Support partners to avoid and mitigate, as far as is reasonably practical, foreseeable safety and security risks.
- ✓ Ensure clear, open and respectful two-way communication on performance.
- ✓ Take appropriate steps to ensure that IRC funds are used in accordance with applicable laws, donors' requirements and IRC standards.
- ✓ Involve local partners in the planning, design, implementation and review of IRC programs whenever possible.

## **You Should Avoid:**

- X Condescending or disrespectful behavior toward partner organizations and their staffs.
- X Any form of abuse of power in partner relationships.
- X Misrepresentation of a partner's work as that of the IRC.

## **You Should Report:**

- ▲ Actual or perceived "conflicts of interest" in partner relationships.
- ▲ Corrupt or biased decisions with respect to partner organizations.
- ▲ Fraudulent selection of partners.
- ▲ Theft or diversion of aid or resources by partners.
- ▲ Lax or inadequate monitoring of partner performance or effectiveness.

**QUESTION:** *The head of a partner organization has asked to see a copy of the prime award-ee budget under which they are funded as a sub-awardee. Can I share it?*

**ANSWER:** You should consult with the IRC manager responsible for administering the IRC's confidentiality obligations to the donor, or with the Office of General Counsel to determine whether sharing the information would be permissible.



### **Relevant IRC Policies and Guidance:**

- Fiscal Integrity Policy
- IRC Global Safety and Security Policy
- Beneficiary Protection from Exploitation and Abuse Policy
- Conflict of Interest Policy for Employees
- Open Information Policy
- Sub-Award Partnership Management System
- Finance manuals



### **Further Reading:**

- Code of Conduct for the International Red Cross and Red Crescent Movement and NGOs in Disaster Relief



# Our Commitments to Our Organization

The IRC transforms donor contributions into humanitarian aid for clients. To do this, the IRC must remain uncompromised and efficient in carrying out its work. We must safeguard IRC's assets and put the interests of the organization first.

## You Uphold the IRC Way When You:

- ✓ Avoid and disclose to your supervisor actual or perceived “conflicts of interest”—that is, situations when personal interest in outcomes may interfere or conflict with IRC interests.
- ✓ Use IRC resources responsibly and lawfully and secure them from theft, fraud, waste, abuse or harm (without endangering yourself or others).
- ✓ Maintain accurate books and records.
- ✓ Observe proper controls and maintain segregation of duties related to the request, approval and verification of purchases.
- ✓ Monitor expense reports, vendor payments, payroll figures and budget variances for unusual activity.
- ✓ Protect confidential and proprietary information from unauthorized access or disclosure.
- ✓ Retain and discard documents in accordance with document retention policies.
- ✓ Cooperate fully when asked to provide information to an IRC auditor or investigator.

## You Should Avoid:

- X Using IRC position or information for personal gain.
- X Using IRC time or property to perform work for another employer.
- X Participating, without disclosure, in hiring or contracting decisions that involve individuals or entities with whom you have more than a professional working relationship.
- X Seeking, accepting or offering anything of value (including gifts, favors, entertainment, bribes or kickbacks) that create or may appear to create improper influence or unfair advantage.
- X Falsifying records or reports (including receipts, time sheets, inventories, financial statements, program data, etc.).
- X Improperly circumventing or overriding internal controls.
- X Installing unauthorized IT hardware or software.
- X Destroying records that are responsive to an active or anticipated audit, investigation, lawsuit or claim.
- X Providing false, misleading or incomplete responses to information requests by IRC auditors or investigators.

## You Should Report:

- ▲ Fraud, theft, kickbacks or embezzlement.
- ▲ Use of IRC IT materials for personal benefit, political activity, unsolicited advertising, or the solicitation or performance of prohibited activities.
- ▲ Actions that may discredit the IRC's reputation or harm its public image.



**QUESTION:** *My brother-in-law's company provides a service that the IRC hopes to procure. Can I tell my brother-in-law about the opportunity?*

**ANSWER:** If the opportunity has already been announced publicly, then you may tell your brother-in-law about it. However, you should not say or do anything that could be seen as giving your brother-in-law an unfair advantage over other potential suppliers. For example, you should not share any non-public information about the IRC or the particular opportunity. Finally, you must disclose your relationship to the procurement department, and you cannot be part of the decision-making process for the opportunity.

**QUESTION:** *How do I know if something contains "confidential information" that cannot be disclosed without authorization?*

**ANSWER:** Confidentiality is often determined on a case-by-case basis. Be cautious and assume that all IRC information is proprietary. Not all confidential documents will be marked "confidential." If you are unsure about any particular document, seek direction from your manager or the Office of General Counsel before making any disclosures.



### **Relevant IRC Policies and Guidance:**

- Conflict of Interest Policy for Employees
- Fiscal Integrity Policy
- Confidentiality Policy
- Information Technology Acceptable Use Policy
- Global Mandatory Document Retention Policy
- Media and Social Media Policies and Guidelines
- Other IT policies governing IT equipment and data protection
- USP guidance on lobbying





## Our Commitments to Society

The IRC is committed to being a responsible global citizen. Our interactions with governments, regulators, the media and local communities must be grounded on honesty, trust and fairness. We support the legitimate rule of law and will do our part to promote high ethical standards in the countries and communities where we work.

### **You Uphold the IRC Way When You:**

- ✓ Provide truthful and complete information when interacting with donors, the media, auditors, regulatory agencies or investigators.
- ✓ Connect our work to larger initiatives that bring protection, stability and inclusion to displaced populations.
- ✓ Minimize and mitigate any adverse environmental impacts caused by our operations.
- ✓ Ensure your activities are consistent with the standards contained in this Code when identifying yourself as a member of the IRC on social media.
- ✓ Seek guidance from the Office of General Counsel when dealing with countries under economic sanctions or when presented with boycott requests.
- ✓ Seek guidance from Global Communications for all media outreach, responses, interviews and public advocacy inquiries.
- ✓ Seek guidance from the Advocacy Department for all lobbying activities.

### **You Should Avoid:**

- X Giving or receiving anything of value to anyone (including a government official) in order to influence decisions or to secure unfair advantage.
- X Providing false, misleading or incomplete responses to valid requests for information by government agencies.
- X Pressuring colleagues to make political or charitable contributions.
- X Lobbying for legislative action or participating in any political campaign on behalf of the IRC without involvement from the Advocacy Department.
- X Affiliations that could interfere with your impartiality (or appearance of impartiality) in carrying out IRC work or that could harm the IRC's reputation.

### **You Should Report:**

- ▲ Requests to cooperate with an unsanctioned boycott.
- ▲ Situations that endanger health, safety or the environment.

**QUESTION:** *A customs official tells me that it will take six weeks for our computers to clear. He also hinted that it could be a much faster process if we just provided a little financial “incentive” for him. We really need these computers and it’s just a small amount that he’s asked for. Can I pay him?*

**ANSWER:** Definitely not. Unless the amount being requested is a government-authorized, government-collected and transparent fee for legitimately expediting the clearance, this is an example of a prohibited payment. The IRC will not engage in improper acts, even if it means that our operations are slowed down or negatively impacted as a result.

**QUESTION:** *A local politician who believes in policies that would benefit the IRC’s work is running for office. Can we supply the paper and use our copier to make fliers for her campaign?*

**ANSWER:** No, the use of the IRC’s time, equipment or property for political activities is not allowed.

**QUESTION:** *I just saw a posting on social media that claims the IRC knowingly discriminates against a certain tribal community. Is it okay if I set the record straight?*

**ANSWER:** You should not take it upon yourself to engage in social debates on behalf of the IRC. You should report the matter to your manager or to the IRC Communications team who will determine how best to address the matter.



### **Relevant IRC Policies and Guidance:**

- Anti-Bribery Policy
- Anti-Money Laundering Policy
- Fiscal Integrity Policy
- Economic Sanctions and Anti-Terrorism Compliance Policy
- Export Control Policy
- Anti-Boycott Policy
- Environmental Policy
- Procurement manuals





# Getting Help

This section describes resources available for the proper implementation of the Code of Conduct throughout the IRC.

## How to Spot Ethical Dilemmas:

Before making a decision or pursuing a course of action, consider its potential ethical dimensions by asking yourself:

- Does the decision or action meet the letter and spirit of the IRC's Code and external obligations?
- Who might be affected by the decision?
- Would additional advice or expertise help?
- If this decision was made public, would I feel comfortable explaining it to colleagues or investigators?
- Is my judgment impartial, or do I have a personal stake in the outcome that makes me less objective?



## Your Duty to Speak Up:

One of the most tragic aspects of wrongdoing is when people look the other way. In addition to knowing the ethical and legal obligations that apply to your job, you are expected to speak up if:

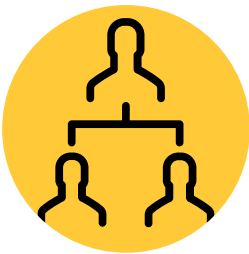
- You are ever unsure about the proper course of action and need advice.
- Particular actions or decisions make you uncomfortable.
- You know or suspect that any of the following parties have been, or are about to be, engaged in illegal or unethical activity in connection with the IRC's work:
  - IRC managers, staff, incentive workers or volunteers
  - Suppliers
  - Partners or subcontractors
  - Agents, consultants or intermediaries acting on the IRC's behalf.





**Channels for Raising Concerns:**

The IRC has several channels of communication for staff seeking advice or wishing to report concerns. You should choose the channel you feel most comfortable with, but note that colleagues closest to the situation—your supervisor or local management—are often in the best position to help. Available resources, listed in context of “sample issues,” include:



SAMPLE ISSUES	RESOURCES TO CONSIDER
Local operational matters	Supervisor/Local Managers
Workplace disagreements (job assignments, performance appraisals, compensation, benefits, conflicts with supervisors or co-workers)	Human Resources (HR)
Safety of IRC personnel and resources	Security
Financial reporting, accounting, tax reporting, books and records	Finance
Fundraising or compliance with donor or grant requirements	Awards Management Unit
Procurement or supply chain matters	Global Supply Chain
Legal matters or policy interpretations	Office of General Counsel
Code of Conduct matters unspecified above, or matters that remain unresolved after initial consultations	Ethics and Compliance Unit

Note that all resources are responsible for coordinating with the Ethics and Compliance Unit if a received concern reflects a potential violation of the IRC’s Code of Conduct.

# HOW TO RAISE CONCERNS





**[Integrity@rescue.org](mailto:Integrity@rescue.org)**

This is an email box monitored by the ECU in New York. You can email questions and concerns to this address.

## **Ethics and Compliance Hotline**

The Ethics and Compliance Hotline is available when:

- **You feel uncomfortable using another channel of communication.**
- **Other channels prove ineffective or appear unresponsive.**
- **You wish to report your concern anonymously.**

The Hotline is administered by EthicsPoint, which is an independent third party that does not log or identify telephone numbers or computer IP addresses. It is available 24 hours a day, seven days a week, in multiple languages. It is available for use by anyone involved with the IRC (including staff, clients, suppliers or partners).

If you use the phone option, a trained specialist from EthicsPoint will make a detailed summary of your question or concern. The details will be forwarded to the IRC's Ethics and Compliance Unit for further response.

### **EthicsPoint can be reached by telephone or online:**



#### **TELEPHONE**

**Outside the U.S:**  
**+1 (503) 352-8177**  
(call collect)

**Inside the U.S:**  
**(866) 654-6461**



#### **ONLINE**

**Visit [irc.ethicspoint.com](http://irc.ethicspoint.com)**  
**and follow instructions**

## **Anonymity and Confidentiality**

You are encouraged to provide your name when raising a concern. This allows those who are responding to your concern to contact you if additional information is needed to look into your concern thoroughly. Providing your name also helps us ensure that you do not experience retaliation for making a good faith report. (There may be unique circumstances when disclosing your identity is required by law or is necessary to fully investigate and address your concerns.)

If you choose to identify yourself when using the Hotline, the IRC will endeavor to keep your information confidential, sharing it only on a need-to-know basis among those directly handling or overseeing the issues you reported.

If you make a report anonymously, it is important to provide detailed information. EthicsPoint will assign you with a case number and you should regularly check the site to respond to information requests from the investigation team. Cases that lack enough information for investigators to pursue may be closed.

The IRC recognizes that individuals may wish to raise concerns anonymously, but do not use the Hotline in bad faith (e.g., to file fabricated complaints for ulterior reasons). Anonymous reports made in bad faith undermine the integrity of the Hotline for everybody.



## Anti-Retaliation Policy

The IRC will not tolerate retaliation against anyone who, in good faith, reports a concern or participates in an investigation, even if the allegation ultimately is not substantiated.

Anyone, regardless of position or tenure, found to have engaged in retaliatory conduct against someone who has raised an ethics or compliance concern will be subject to disciplinary action, and possibly termination. If you feel you have been subjected to retaliation, you should contact the Hotline for assistance.

The IRC encourages managers and employees to self-report violations and, depending on the specific circumstances, may treat self-reporting as a mitigating factor when assessing any disciplinary measures.

## Responsiveness

The IRC takes all concerns seriously and acts on all reports no matter the option. Out of respect for the privacy of individuals who may be affected by your report, the IRC may be unable to provide you with detailed results of our investigation, or tell you what actions were taken in response. Whenever possible, we will provide you with status updates so you know that your concern is receiving an appropriate response. Members of senior management and the Audit Committee of the IRC's Board of Directors also monitor the resolution of cases.

# Q&A

**QUESTION:** *I am pretty sure that I observed a violation of the IRC Way, but I am not completely certain. I don't want to report something if it turns out that I am wrong. What should I do?*

**ANSWER:** You should report your concern promptly even if you do not have all the facts so that the appropriate personnel can look into the issue and determine whether a violation occurred. As long as you reasonably believe that a violation occurred, you are reporting in good faith and you are doing the right thing.



# Enforcement

Anyone who violates the IRC's Code or its underlying policies, regardless of position or tenure, may be subject to disciplinary action, including termination. The following are examples of conduct that may result in disciplinary action:



- **Violating the Code**
- **Directing or encouraging others to violate the Code**
- **Failing to report known or suspected violations of the Code**
- **Interfering with an audit or investigation**
- **Being uncooperative or untruthful during an audit or investigation**
- **Retaliating against others for raising a concern**

Violations of laws or regulations can trigger legal action against you, your colleagues, the IRC or its partners or suppliers that could result in:

- **Fines**
- **Suspension**
- **Debarment**
- **Imprisonment**

Those people who work on behalf of the IRC will be asked to sign a statement certifying that they understand and will abide by this code. Each person will sign the statement when they begin working for the IRC, and each year thereafter where allowed by law.



[illegible]

[illegible]



### **International Headquarters**

122 East 42nd Street  
New York, New York 10168-1289  
USA  
Phone: + 1 212 551 3000  
Fax: + 1 212 551 3179