

# water for people

# **Code of Conduct**



# **Table of Contents**

Applicability	5
Responsibility	5
Speaking Up	6
Act with Integrity	7
Embrace Justice, Equity, Diversity, and Inclusion and Treat Others with Respect and Dignity	8
Follow the Law at All Times and in All Locations	9
Protect the Environment, Health, and Safety	10
Avoid Conflicts of Interest	12
Keep Accurate Financial Books and Records	13
No Inappropriate Gifts, Entertainment, and Payments	14
Take Actions to Protect Community Members from Abuse or Exploitation	15
Confidential Information and Data Protection	17
Responsible Social Media Use	18
Comply with Water For People Policies and Procedures	19
Mandatory Training and Acknowledgement	19
Violations of this Code	19
Reporting Concerns and No Retaliation	20
Additional Resources	21



Water For People's vision is a world where every person has access to reliable and safe water and sanitation services. Our mission is to promote the development of high-quality drinking water and sanitation services, accessible to all, and sustained by strong communities, businesses, and governments.

# Our values are based on demonstrating integrity in all we do:



# Ethical behavior is at the core of who we are and how we live our values.

This Code of Conduct (Code) is a comprehensive guide to acting with integrity and honesty. The Code provides guidance to employees in their conduct as representatives of Water For People and addresses our responsibilities to Water For People, each other, the communities we serve, governments, partners, donors, and vendors. We have included possible ethical scenarios applicable to each section. These are hypothetical scenarios and are not based upon incidents that occurred at Water For People.

If you apply the principles in the Code in your decision-making and behavior, you will be guided in the right ethical direction.

#### WATER FOR PEOPLE'S ETHICAL PRINCIPLES INCLUDE:

- Act with integrity.
- Embrace justice, equity, diversity, inclusion, and diverse backgrounds and perspectives; and treat your fellow colleagues, community members, and business partners with dignity and respect.
- Follow the law at all times and in all country locations in which we operate.
- Protect the environment and the health and safety of our employees and communities we serve.
- Keep accurate financial books and records.

- Avoid conflicts of interest.
- Do not accept or make unlawful or inappropriate gifts, entertainment, or payments.
- Take actions to protect community members particularly those who are most vulnerable from abuse or exploitation.
- Protect confidential information; manage and protect data.
- Use social media responsibly.
- Comply with Water For People policies.

## Applicability

This Code applies to all employees globally, interns, and board members. Water For People has developed a <u>Vendor Code of Conduct</u> that applies to our contractors and consultants and a <u>Volunteer Code of Conduct</u>.

## Responsibility

### **EMPLOYEES**

All Water For People employees are integral to maintaining the organization's integrity. We are all responsible for reading, understanding, and complying with this Code and Water For People policies.

#### MANAGERS

Managers are responsible for modeling ethical behavior and encouraging open communication of concerns without fear of reprisal. Managers are critical in establishing our culture of integrity. Managers are responsible for ensuring that all employees, whether full-time, temporary, or parttime, are aware of this Code and Water For People policies and that new employees receive compliance training as part of their onboarding. Managers should never encourage or direct employees to achieve results at the expense of ethical conduct or a violation of the Code. Managers should promptly act to stop a Code violation once they are aware of the offense. Managers need to elevate employee concerns of misconduct or violations of this Code, or any Water For People policy. Concerns (new or previously unresolved issues) or grave misconduct shall be brought to a member of the Global Leadership Team, Director of Global Talent Management or Director of Risk Management.





## **Speaking Up**

One of the most important things we can all do to protect Water For People's ethical culture is to raise concerns regarding potential misconduct. Water For People welcomes and encourages employees to raise any concerns and affirms that they are protected from retaliation if they speak up. Employees are expected to report any concerns regarding misconduct, violations of this Code, or Water For People policies. Employees can report concerns to their manager, the Chief Finance and Administrative Officer, the Director of Risk Management, a member of the Global Leadership Team, Director of Global Talent Management, any member of the Talent Team, or through our Ethicspoint hotline.

### IF YOU RAISE AN ETHICAL OR MISCONDUCT CONCERN, WATER FOR PEOPLE COMMITS THAT:

- 1. You will be treated with respect.
- 2. Your concern will be treated seriously.
- **3.** Your concern will be investigated promptly, fairly, objectively, and thoroughly.
- **4.** If you use the Ethicspoint hotline, you will not be required to identify yourself.
- 5. Your concern will be kept confidential to the extent permitted by law, and Water For People's need to investigate the matter fully. If Water For People discovers criminal conduct, we may be required to report such activity to the appropriate government enforcement authorities.

- **6.** Only those who need to know will be involved.
- Threats or acts of retaliation against you for reporting or participating in any investigation of unethical or illegal conduct will not be tolerated.
- We will take appropriate corrective or disciplinary actions for violations of our Code or policies.
- 9. If you are contacted regarding an internal Water For People investigation or audit, it is important that you cooperate and provide accurate and factual information.



## **ACT WITH INTEGRITY**

Integrity means doing the right thing even when nobody is watching and even if there is tremendous pressure to do otherwise. Our ability to achieve our mission depends on acting with integrity. By demonstrating integrity in all we do, we reflect positively on Water For People, our reputation in the countries where we operate, and our donors. Our Code is not just a set of rules; it is a framework for acting in good faith, communicating transparently, and seeking fair outcomes. Acting with integrity means that we will not engage in misrepresentation or failure to disclose important information so that we benefit personally or Water For People benefits unfairly. We act with integrity when we do not take advantage of positions of trust for personal or organizational gain. Performing professional services in accordance with applicable professional standards of care is acting with integrity.

I noticed my manager has been ordering office furniture and supplies with Water For People funds, but the deliveries are not made to the office. I am concerned that she is diverting these orders for her personal use. This is really bothering me; what should I do?

It is important that you raise this concern. You have many avenues for doing so. You can choose the one with which you are most comfortable including notifying someone including the Director of Risk Management or Chief Finance and Administrative Officer. If you wish to remain anonymous, you can report via the <u>Ethicspoint hotline</u>. We will protect you from retaliation and diligently conduct the investigation. If the employee is engaging in theft, they are stealing from Water For People and improperly using funds meant to benefit all employees in that office or to fund our programs.

## EMBRACE JUSTICE, EQUITY, DIVERSITY, AND INCLUSION, AND TREAT OTHERS WITH RESPECT AND DIGNITY

Water For People believes we must champion a culture and environment of justice, equity, diversity, and inclusion (JEDI) for all employees, Board members, volunteers, business partners, and members of the communities we serve. Organizations that implement JEDI throughout all levels create a positive work environment that optimizes our ability to work together, maximizes organizational results, and strengthens the quality of the services provided to communities, districts, countries, and globally. We recognize that the work of JEDI is a journey and that we can only achieve our mission and strategy if we are unwavering in our JEDI commitment and actions.

It is essential to recognize that each element of JEDI is interrelated and reinforces each other. Taken together, they create a lens through which we will make decisions and perform our mission.

Water For People has adopted a <u>JEDI Policy</u> that sets forth our commitments to creating and fostering a culture of JEDI for our employees and managers, prohibits discrimination, harassment, and bullying, and confirms our commitment to JEDI values in how we achieve our mission and deliver our work.

## THE ELEMENTS OF JEDI HAVE THE FOLLOWING MEANINGS:

- **Justice** is about awareness of and deconstruction of systemic barriers to resources and opportunities.
- **Equity** is about creating systems and a culture where everyone has the opportunities and resources they need to thrive.
- **Diversity** is about welcoming, understanding, and valuing the unique perspectives, experiences, and differences in us all.
- **Inclusion** is about creating a culture and environment where any individual or group can feel welcome, respected, supported, and valued.

I have observed that my manager does not invite one of my colleagues to meetings. This person should be participating in these meetings. When she tries to contribute to discussions, he speaks over her or ignores her. She is smart and has so much to contribute. She is the only female in the group. It appears that he is purposefully excluding her, which is unfair. I also don't want to get on the wrong side of my manager.

Α

This is a possible violation of the principles of the Code and of our JEDI Policy that should be investigated from both employees' perspectives. All employees need to have their voices heard and their contributions welcomed and valued. You can't have an inclusive environment otherwise. If you feel comfortable, you should first encourage your colleague to raise her concern directly with her manager. If that does not resolve the situation, she could bring her concern to a member of the Talent Team. Your colleague may not be comfortable raising this herself, but you can be an ally and support and encourage her to raise the issue. You also can raise this issue directly if she is unwilling to do so.



## FOLLOW THE LAW AT ALL TIMES AND IN ALL LOCATIONS

Water For People seeks to be 100% compliant with the law of the land, wherever that land may be. As laws can't cover every scenario, Water For People will comply with the letter and spirit of all applicable laws and regulations.

In many cases, laws apply to Water For People and its employees wherever they are in the world. Examples of such laws include U.S. laws that forbid the payment of bribes to gain unfair business advantages or impose sanctions on doing business with particular countries, entities, or individuals. All employees must follow Water For People's <u>Anti-Corruption/Anti-Bribery Policy</u>.

Employees are expected to comply with applicable national and local laws alongside this Code. If a provision of this Code conflicts with applicable law, the law prevails. If employees are uncertain what laws apply to them in a given situation or believe there may be a conflict between different applicable laws, they should consult:

- A member of the Talent Team for employee wage and employment conditions issues,
- Local Finance for taxation and other financial issues, or
- Their Country Director or the Chief Finance and Administrative Officer regarding all other issues.

Q

I am not sure that our approach to paternity time is consistent with the employment laws of my country. I am not sure how to handle this concern as I know it could cost Water For People more money to follow the regulations if paternity leave is required.

Water For People is committed to complying with all laws relating to benefits, compensation, and leave and following employment agreements. It is important that you raise this issue with a member of the Talent Team who will investigate the regulation and our practices.



## **PROTECT THE ENVIRONMENT, HEALTH, AND SAFETY**

#### **ENVIRONMENT**

Water For People is committed to minimizing negative environmental impacts from our work and delivering our work in a way that considers climate change and resilience. Water For People has adopted an <u>Environmental Stewardship Policy</u> that affirms our commitment to reducing carbon emissions and other environmental impacts from our operations and includes climate change adaptation and resilience practices in delivering our work.

#### HEALTH

Water For People is committed to providing an environment where employee health and wellness are prioritized. Water For People provides its employees with a wellness program, including global online and telehealth medical services. Employees are required to comply with all country and local public health guidelines, recommendations, and requirements, and any health-related guidance or policies issued by Water For People.

### SAFETY

Water For People seeks to provide a safe workplace for employees, prevent workplace accidents, and take actions to minimize negative safety impacts on communities and the public. To achieve this, every employee needs to assume responsibility for safety. All employees are required to:

- Obey safety rules, including in-country safety plans.
- Obey safety rules including those in country safety plans.
- Keep work areas clean and free from slipping or tripping hazards.
- Use prescribed personal protective equipment.
- Immediately report unsafe conditions or equipment or vehicle malfunctions to a supervisor.
- Use care when lifting and carrying objects.
- Observe restricted areas and all warning signs.
- Promptly report any accident or injury, no matter how insignificant it may seem, at the time of occurrence to a manager, the Country Director, and the Global Facilities, Health, and Safety Manager. Follow the care prescribed by the attending medical professional when treated for an injury or illness.
- Participate in accident investigations and asset-loss control activities as needed.



#### SECURITY

Water For People has zero tolerance for violent acts, threats of violence, or verbal abuse. Any employee who commits or threatens to commit a violent act against any person while on Water For People's premises or while performing work for Water For People will be subject to disciplinary action up to, and including, termination.

The possession of weapons, firearms, explosives, or live ammunition on Water For People property or while doing Water For People work is expressly forbidden. Water For People's property includes, but is not limited to, all facilities, vehicles, and equipment, whether leased or owned by Water For People. In addition, firearms in employee-owned vehicles parked on Water For People property are strictly forbidden.

An employee who is subjected to or threatened with violence, or who is aware of another individual

who has been subjected to or threatened with violence or believes another employee has a weapon, should immediately report this information to their manager, a member of the Talent Team or the Chief Administrative Officer.

#### **DRUG-FREE WORKPLACE**

Water For People has adopted the <u>Drug-Free</u> <u>Workplace Policy</u> that sets forth our commitment to a drug-free workplace. The Drug-Free Workplace Policy prohibits the use of illegal drugs at the workplace and prohibits employees from being under the influence of alcohol or other legal drugs or medicine while at work.

I noticed that one of my co-workers is repeatedly violating our safety requirement for vehicle usage. She refuses to wear her seat belt because she says it is uncomfortable. She drives excessively fast on treacherous roads, and she allows her family members to ride in the Water For People vehicle during off-hours. I am concerned for her safety and mine and that she is using the vehicle for non-work purposes.

Α

Complying with our safety plans is not negotiable. Your safety is not negotiable. Her safety is not negotiable. If you are in a vehicle and she is driving unsafely, you need to speak up immediately. If she refuses to comply, you can ask to drive. It is important to report this conduct to your Country Director, a Talent Team member, the Chief Finance and Administrative Officer, or the <u>Ethicspoint hotline</u> if you prefer to be anonymous.

## **AVOID CONFLICTS OF INTEREST**

As employees of Water For People, we have a duty to pursue the organization's best interests. Our individual and collective best interests are only served when each of us acts without being under undue influence or having conflicting duties. Water For People has adopted a <u>Conflict of Interest Policy</u> that establishes our commitment regarding preventing, disclosing, and mitigating personal and organizational conflicts of interest, and conflicts of interest that may arise at the Board of Directors' level. It also establishes disclosure requirements and a process for evaluating and mitigating disclosed conflicts of interest.

### PERSONAL CONFLICTS

Personal conflicts may exist when an employee or their relatives have outside business or financial interests in a vendor that does business with Water For People. Conflicts will exist when an employee or their relatives accept a benefit from a vendor who does or is seeking to do business with Water For People, and that employee is involved in the selection or management of that vendor. Conflicts may also exist when an employee has a relative working for Water For People – particularly if they manage that relative. Employees must be careful to ensure that outside interests and activities do not conflict with their obligations to Water For People. Since outside employment may create the appearance of bias or interfere with decisions in the best interest of Water For People, employees may not be employed by, consult for, or be affiliated with a Water For People competitor, partner, or vendor, or engage in activities that compete with, or appear to compete with, our organization's interests without prior written approval of their supervisor and the Chief Administrative Officer.

#### **ORGANIZATIONAL CONFLICTS**

Organizational conflicts may exist when Water For People has multiple types of relationships with the same third party or when we provide to a party a scope of work on a project that we also seek to pursue.

### DISCLOSURE OF TYPES OF CONFLICTS

Conflicts can be actual, potential, or perceived. Employees are required to disclose actual, potential, or perceived personal or organizational conflicts of interest once they arise OR become aware. Upon hire and annually, employees are required to complete and submit a Conflict of Interest Questionnaire, and board members are required to complete a Board Conflict of Interest Acknowledgment and Questionnaire. In the interim, if any employee recognizes a conflict of interest, they are required to disclose it to the Chief Administrative Officer. If any Board member recognizes a conflict of interest, they are required to disclose it to the Chief Executive Officers.

Q

I noticed that a colleague involved in procurement decisions has repeatedly awarded subcontracts to a company where his daughter works. His daughter is a key employee at that company. It seems like there could be some favoritism going on. I only discovered the relationship when he accidentally disclosed that she works there.

Α

This certainly could be a personal conflict of interest. If the procurements are not awarded following the <u>Procurement Policy</u>, it could be an actual conflict of interest. Even if it is a low-price award, it could be a perceived conflict of interest, as he could provide information to his daughter that would help her company know the target bid price. His failure to disclose the relationship and recuse himself from the procurement process violates our Code and Conflict of Interest Policy.



## **KEEP ACCURATE FINANCIAL BOOKS AND RECORDS**

Fiscal responsibility is a critical part of integrity, and achieving that goal requires adhering to Water For People policies, procedures, and standards. It is essential that all financial books and records are accurate, complete, and kept according to the Water For People <u>Finance Manual</u> and the internal controls outlined in the manual, and any applicable and relevant policies or donor requirements. As an entity serving the public good, Water For People has an ethical obligation to conduct its financial activities in a manner that is accountable and transparent to the users of its financial information. For public access, annual reports, audited financials, and tax filings are published on the Water For People website.

Employees are obligated to provide accurate information in business reports and records. Employees must submit accurate expense reports for expenses actually incurred and associated with work activities. When reporting to institutional investors, governments, and donors, employees must submit information that accurately reflects the work or services performed and the expenses incurred. Failure to do so on a US government contract could result in Water For People being subject to false claims liability. This carries significant penalties and ramifications.

Employees shall maintain business records in accordance with the <u>Record Retention Policy</u>, which provides consistent business practices for when to retain or discard Water For People records, consistent with legal and contractual requirements.

In 2019, financial reports submitted to regulatory institutions of the "Country Program Office" were missing records of some transactions. The information was inconsistent with the audited final reports. Upon realizing this, the Country Program team decided not to make a correction and not notify the corresponding entity. They chose to wait and see if the regulatory institution identifies the missing records when they conduct an audit.

Α

Failure to report accurate financials is a Code non-compliance. All employees are responsible for supporting accurate record-keeping and reporting. Financial and management teams must manage records ethically and ensure that reports are accurate and reported correctly to avoid potential individual and organizational liabilities.



## NO INAPPROPRIATE GIFTS, ENTERTAINMENT, AND PAYMENTS

While employees must be sensitive to cultural differences everywhere we operate, Water For People always expects employees to conduct business ethically and in accordance with this Code and our policies.

### ANTI-CORRUPTION/ANTI-BRIBERY

Water For People strongly opposes corruption and the toll it takes by diverting funding away from critical infrastructure and development needs where we operate. Water For People's <u>Anti-Corruption/Anti-</u> <u>Bribery Policy</u> mandates that no person or entity associated with the organization shall offer, promise to pay, or give money or anything of value, directly or indirectly, to any person to obtain or retain some business advantage or authorize another to do the same. Water For People employees shall not pay socalled facilitation or "grease" payments to individuals, including government officials. Facilitation of "grease" payments are normally small payments, not required by law, that individual government employees request to speed up the issuance of some government document or approval.

### **GIFTS AND ENTERTAINMENT**

Employees must not request or accept gifts, hospitality, travel, or entertainment from any business partner when the value is more than USD\$25 without prior approval. Hats, writing utensils, mugs, and clothing that are branded or culturally appropriate gifts do not require approval. Requesting or receiving cash or cash equivalents is never acceptable and would violate our <u>Conflict of Interest Policy</u>.

I was shocked when I heard that one of our senior managers took a government official, with whom we work, and the official's wife for a lavish meal involving champagne and very expensive food. This government official is critical to identifying matching governmental funding for our work. I did not think we did things like that.

Α

You are right. Our Code and the Anti-Corruption/Anti-Bribery Policy clearly prohibits this type of entertainment and spending. This behavior could subject Water For People and the senior manager to criminal and civil liabilities. You should report this incident to your Country Director, any member of the Global Leadership Team, the Chief Finance and Administration Officer, the Director of Risk Management, or the Ethicspoint hotline. Water For People needs to investigate this incident. We may determine that we will self-report the incident to the US government as a risk mitigation measure and, at the same time, determine appropriate disciplinary action for the senior manager.



## TAKE ACTIONS TO PROTECT COMMUNITY MEMBERS FROM ABUSE OR EXPLOITATION

Water For People has an ethical obligation to the communities in which we work and with respect to the employees we hire to protect them from abuse or exploitation. This obligation is heightened when we interact with the most vulnerable individuals that are in need of water, sanitation, and hygiene services including children and disabled individuals.

#### HUMAN TRAFFICKING

Water For People has adopted an <u>Anti-Human</u> <u>Trafficking Policy</u> that states our commitment to not engage in conduct that constitutes human trafficking. Human Trafficking includes:

- Sexual exploitation or commercial sex acts,
- Forced marriages,
- Organ trade,
- Running drugs,
- Forced labor or begging, and
- Labor where the recruitment or treatment involves coercion or misleading treatment such as withholding identity documents, refusal to disclose key employment terms, charging recruited employees a recruitment fee, failing to provide promised housing, or failing to provide return travel to home country at completion of services.

Water For People has an <u>Anti-Human Trafficking</u> <u>Procedure</u> that establishes the measures we will take to ensure and monitor compliance with the Anti-Human Trafficking Policy and our USAID contractual obligations, including requirements for external recruiting firms, reporting violations, and subcontractor due diligence, monitoring, and reporting.

## CHILD SAFEGUARDING AND PROTECTION FROM SEXUAL EXPLOITATION AND ABUSE

Water For People has zero tolerance for child abuse, neglect, or sexual exploitation by our employees or subcontractors in the performance of our work. Water For People's <u>Child Safeguarding Policy</u> prohibits the following conduct with respect to children:

- Physical punishment,
- Inappropriate language,
- Discrimination,
- Having children stay overnight or sleeping with children,
- Humiliation or degradation,
- Inappropriate touching, or
- Using technology to harass children or to create child sex abuse material.



#### Our Protection from Sexual Exploitation and

<u>Abuse (PSEA) Policy</u> sets forth Water For People's commitment to prevent and respond to sexual abuse and exploitation. This policy includes employee vetting and training requirements and reporting, investigating, and victim assistance obligations. This policy prohibits:

- · Sexual abuse and exploitation by employees,
- Sexual activity with children,
- Exchange of money or other benefits for sex or sexual favors, and
- Sexual relations between employees and beneficiaries of our programs.

Water For People has a <u>Child Safeguarding Procedure</u> that establishes the measures we will take to ensure and monitor compliance with the policies, including requirements for project design, risk assessments and mitigation, reporting mechanisms and investigation protocol, media best practices, employee screening, and visitor and volunteer awareness and monitoring processes.

Water For People prohibits employees from creating, viewing, or possessing any child sexual abuse material at work or when using Water For People assets. Violations of the provisions in this paragraph shall result in disciplinary action including, but not limited to, termination of employment.

## IMAGE, LIKENESS, AND PERSONAL INFORMATION

Water For People has adopted a <u>Consent to Use</u> <u>Image, Likeness, and Personal Information Policy</u> that establishes detailed requirements regarding using and allowing others to use images, likenesses, and personal information that we have obtained.

Q

I saw something that really troubles me. One of our local contractors has workers who I believe were recruited internationally and do not appear to be able to leave the country because their passports are being held by the contractor. I heard the workers discussing how poorly treated they are and that they have no options to leave. This is not Water For People doing this but our contractor. What is my obligation to report this?

Α

Water For People does not tolerate human trafficking, and it sounds like this conduct has some of the red flags associated with human trafficking and is related to our work. We have a moral obligation to address this issue as it may violate local law. If this is a USAID-funded project, our contractor has clear obligations not to engage in human trafficking included in their contract. We have a <u>Anti-Human</u> <u>Trafficking Procedure</u> that requires us to ensure compliance by conducting due diligence into their conduct. Our responsibilities may include terminating its subcontract and/or reporting this potential violation to legal authorities. Our <u>Vendor Code of Conduct</u> also prohibits human trafficking.

## **CONFIDENTIAL INFORMATION AND DATA PROTECTION**

### **CONFIDENTIAL INFORMATION**

Each employee is responsible for properly handling the confidential information of Water For People and third parties. Confidential information includes, but is not limited to: employee human resource information, including employment agreements, employee performance evaluations, employee disciplinary action and terms of employment; donor information and records; information specified as confidential under non-disclosure agreements; banking and corporate credit card information; financial records; and legal or attorney-client privileged communications.

#### DATA PROTECTION

Each employee must be vigilant in protecting our data security and Water For People IT equipment and systems. Employees are obligated to comply with the <u>IT Usage Policy</u>, which establishes requirements for training, travel and storage of IT hardware, reporting data breaches, and loss or damage to IT hardware. Additionally, the IT Usage Policy identifies unacceptable use of our IT systems and hardware.

### **EMPLOYEE PRIVACY**

We believe in protecting the privacy of your personal information and will comply with the laws of applicable jurisdictions governing the distribution of that information. We work to protect the privacy of our employees, no matter where they live or work. Under our <u>Data Protection Policy</u>, personal information may be disclosed only if the disclosure is authorized for legitimate business reasons. If you are entrusted with personal information, you must protect its confidentiality, use it only for reasons it was provided to you, and keep it secure. All employees are required to follow our Data Protection Policy.

## DATA RETENTION

To preserve Water For People records as required by our contracts and to ensure that we maintain required records in the event of a dispute, Water For People has instituted a <u>Record Retention Policy</u> that requires most records to be maintained for seven years, except for certain employment records and many corporate records which must be retained permanently. The Record Retention Policy also requires disposal after the retention period. We also need to safeguard and produce information that is subject to litigation, internal investigation, or audit. Please refer to the Record Retention Policy for specific retention requirements.

# Q A

My teenage son asked to use my laptop to apply for jobs as he does not have a computer. Can I give him my laptop and password and let him use it?

You must not allow your son to use Water For People's assets or have your password. He could unintentionally go on to sites or access emails that result in malware being introduced into our system. Your son may also access to Water For People confidential information or personnel information. You need to find an alternative computer for your son to use for his job search.

## **RESPONSIBLE SOCIAL MEDIA USE**

Water For People recognizes the role social media plays in modern communication and the benefits that we gain from our social media profiles. We respect the right of employees to use social networks for selfpublishing and self-expression while adhering to our principles and values.

As a Water For People employee, your social media presence is not only a direct reflection of you personally, but you also represent Water For People and our brand. Commentary that is considered defamatory, obscene, proprietary, or libelous by any offended party could subject you to personal liability and damage Water For People's reputation. Once it's on the Internet, it's there forever. The following are our social media principles:

- Positively engaging with and sharing content posted by Water For People accounts is encouraged and appreciated.
- Positively engaging personally with Water For People stakeholders (donors, volunteers, Board members, sponsors, vendors, etc.) is encouraged and appreciated.
- If you have work-related grievances, speak with the Talent Team or your manager and do not air them on social media.

- Harassing, threatening, discriminating against, or disparaging any individuals through social media is not acceptable.
- Sharing any Water For People confidential information through social media is not permitted.
- Sharing photographs of other employees and Water For People stakeholders without their permission through social media is prohibited.
- Do not disclose information that would jeopardize the security of any Water For People program, employees, or beneficiaries. This includes critical comments about the countries or governments where we work.
- Comply with the <u>Consent to Use Image</u>, <u>Likeness</u>, and <u>Personal Information Policy</u> in all your social media postings related to Water For People or images obtained on Water For People business or travels.
- Contact the Director of Strategic Communication, Chief Growth Officer, or the Chief Finance and Administrative Officer immediately if contacted by the media for an interview or comment or if you are contacted by anyone external to Water For People about any post that relates to Water For People's business.

I am concerned because I saw one of our colleagues in the US post on Facebook and criticize my country's government due to its recent crackdown on dissidents and its actions to restrict the electoral process. This colleague also clearly talked about her role at Water For People. I admire her concern and activism about our country, but I am fearful that this could negatively impact Water For People.

Α

It is important for Water For People employees to avoid politically-related posts, including criticism of any government, political leader, and actions in any country in which we operate. It is critical that Water For People remain neutral in our dealings and opinions on local politics. Failure to do so could jeopardize our standing in that country, our NGO status, and our funding. It could negatively impact our ability to provide critical WASH services to the citizens of that country.



## COMPLY WITH WATER FOR PEOPLE POLICIES AND PROCEDURES

Water For People has adopted policies, procedures (that provide compliance deails with specific guidelines), and standards that set forth requirements usually for a specific task or function. Policies, procedures, and standards are mandatory for all employees. All employees are required to comply with them. To access all of our policies, procedures, standards, and guidelines in addition to those linked in this Code, go to the Water For People intranet, The Source.

## Mandatory Training and Acknowledgement

New employees are required to complete training and acknowledgement on this Code and our key policies within 90 days of starting their employment. All employees are required to complete training and to acknowledge this Code and our key policies on an annual basis.

## Violations of this Code

Employees who violate this Code will be subject to disciplinary action up to, and including, termination.



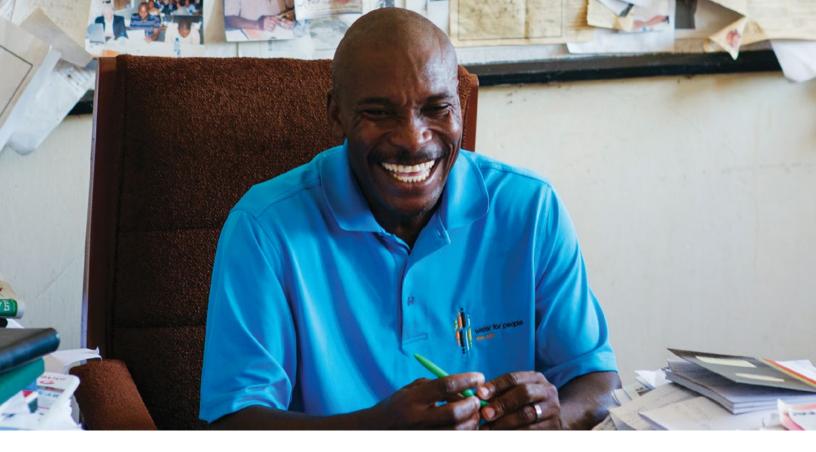
## **Reporting Concerns and No Retaliation**

Water For People wants to hear and address your concerns regarding any potential violations of this Code or any of our policies, whether minor to major. Water For People will not retaliate against anyone who raises good-faith questions or concerns. You can report concerns to your supervisor, the Chief Administrative Officer, a member of the Talent Team, any member of the Global Leadership Team, or through <u>Ethicspoint</u>: www.waterforpeople.ethicspoint.com.

### YOU MAY ALSO CALL ETHICSPOINT USING THE NUMBERS BELOW:

- Bolivia 800-10-0707
- Canada 1-855-481-6235
- Guatemala 1-800-6240091
- Honduras (spanish operator) -800-0123
- India 000-800-100-1071
- **Malawi** There is no local phone number available. Callers should use the USA number or report <u>online</u>.
- Peru 0800-52116

- **Rwanda** There is no local phone number available. Callers should use the USA number or report online.
- **Tanzania** There is no local phone number available. Callers should use the USA number or report online.
- **Uganda** There is no local phone number available. Callers should use the USA number or report online.
- UK 0800-032-8483
- USA 1-855-481-6235



## **Additional Resources**

## PEOPLE

The Director of Risk Management, Chief Administrative Officer, and the Talent Team are available to answer any questions about the Code or discuss any concerns employees may have about potential violations of this Code or any of our policies.

## SAFETY AND SECURITY

International SOS (iSOS) provides medical, clinical, and security advice and assistance to organizations with international operations. If assistance is required, employees should contact iSOS at +1 (215) 942-8226. More information on ISOS coverage, wallet cards with pertinent phone numbers, and information on how to install the app on your smartphone may be obtained from the Global Facilities, Health, and Safety Manager.

- Anti-Corruption/Anti-Bribery Policy
- Anti-Human Trafficking Policy
- Anti-Human Trafficking Procedure
- Child Safeguarding Policy
- <u>Child Safeguarding Procedure</u>
- <u>Conflicts of Interest Policy</u>
- <u>Consent to Use Image, Likeness, and</u> Personal Information Policy
- Data Protection Policy
- Drug Free Workplace Policy

- Environmental Stewardship Policy
- IT Usage Policy
- JEDI Policy
- Procurement Policy
- Protection from Sexual Exploitation and Abuse (PSEA) Policy
- <u>Record Retention Policy</u>
- <u>Vendor Code of Conduct</u>
- Volunteer Code of Conduct



water for people everyone · Forever

**UPDATED APRIL 2023**