

Code of Business Conduct: Finance, Fundraising/Marketing, Global Health Programming, Humanitarian Principles; Disaster Response Principles, Health Affairs

Reinforcing a culture of respect, integrity, accountability and transparency

Project HOPE is committed to the highest standards of ethical behavior in all activities and operations worldwide. Our reputation for integrity and excellence requires carefully following the spirit and letter of all applicable laws and regulations, the avoidance of even the appearance of improper behavior or impropriety, as well as careful regard for the highest standards of conduct and personal integrity.

We will follow all Project HOPE policies, procedures and directives, international humanitarian principles and norms, and all applicable national and local laws, rules and regulations.

We will promote ethical business leadership and responsible business practices in our programs, responses and operations to provide sustainable solutions for the communities Project HOPE serves.

We ensure that our conduct, and the conduct of those who work alongside us, is always of the highest ethical standard, with a focus on respect, integrity, accountability and transparency.

Project HOPE Staff agree to:

- Act honestly, truthfully and with integrity in all transactions and dealings;
- Ensure donor intent is honored;
- Treat our partners, grantees and those we work with fairly;
- Comply with U.S. laws and regulations applicable to conducting business inside and outside the U.S., whether operating in the United States or not;
- Comply with the laws and regulations of the country in which he/she operates, regardless of whether the laws are enforced in practice, or that violation may not be subject to public criticism or censure;
- Treat every individual with dignity and respect, and not to engage in discriminatory or retaliatory behavior;
- Be a good corporate citizen and act responsibly toward the communities in which we work and for the benefit of the communities that we serve;
- Be responsible, transparent and accountable for all actions and inactions of and for those you supervise or work with;
- Act in ways that improve the accountability, transparency, ethical conduct and effectiveness of Project HOPE and the nonprofit sector;
- Ensure programmatic and financial data submitted to donors, governments, agencies, partners and the general public is accurate, complete and current, and in accordance with contractual/grant requirements where appropriate;
- Ensure all funds received through his/her representation of or for the benefit of or result of Project HOPE are donated to Project HOPE and not retained for private benefit;
- Maintain confidentiality, especially for those we serve.

Project HOPE Code of Ethics Policy Module 1: Code of Business Conduct

In general, following Project HOPE Policies and directives and using good judgment based on high ethical principles will help ensure staff and representatives act in compliance with this Code of Business Conduct.

To provide additional clarity, Project HOPE Staff will **NOT**:

- Operate in any manner contrary to the best interests of Project HOPE;
- Take unfair advantage of anyone through manipulation, concealment, fraud, abuse of privileged information, misrepresentation of material facts, or any unfair dealing or illegal practice;
- Use Project HOPE funds, assets or resources for any non-charitable, unlawful or improper purpose;
- Knowingly take any action or make any statement intended to influence the conduct of Project HOPE in such a way as to confer any financial benefit on any person, corporation or entity in which the individual has a significant interest or affiliation;
- Accept, or seek on behalf of any person, any financial advantage or gain of other than nominal value offered as a result of his/her affiliation with Project HOPE;
- Publicly use his/her Project HOPE affiliation in connection with the promotion of partisan politics (nor make any political contributions from Project HOPE funds in the United States, or in any other country, even in locations where such contributions are legal), religious matters, or positions on any issues not in conformity with Project HOPE's Mission and values;
- Disclose or use any confidential Project HOPE information that is available solely as a result of the affiliation with Project HOPE, to or with any person not authorized by Project HOPE to receive such information, or to use any Project HOPE information to the disadvantage of Project HOPE;
- Authorize the use of the Project HOPE name or logo, Project HOPE funds, Project HOPE Trademarks, services or property of Project HOPE for personal gain, or for the benefit or advantage of any person except in conformance with Project HOPE policy;
- Establish or main undisclosed or unrecorded funds or assets for any purpose;
- Engage in relationships that create the appearance of a conflict of interest and or fail to disclose and mitigate actual or apparent conflicts of interest in our relationships.

When in doubt, ask yourself if the behavior reflects positively on Project HOPE

This Code of Business Conduct is a part of the Project HOPE's overall Code of Ethics. Each of the following Code of Ethics policy modules is a key part of the Project HOPE Code of Business Conduct:

- Workplace Conduct: Protecting Our Own and Holding Ourselves Accountable: A Respectful Workplace Culture and Prohibition of Harassment, Discrimination and Retaliation Policy
- Protecting Those We Serve: Safeguarding Children and Protection from Sexual Exploitation, Abuse and Trafficking in Persons
- Protecting Project HOPE Assets: Use of Funds, Confidential and Proprietary Information and Intellectual Property
- Disclosure of Relationships: Conflict of Interest (Protecting Our Mission)

In addition, Project HOPE's Code of Business Conduct includes certain fundamental principles that all Project HOPE Staff must follow in all humanitarian and disaster response activities and for Health Affairs' business activity:

❖ Humanitarian Principles

Project HOPE strictly observes the following principles that provide the foundation for humanitarian action: *humanity, neutrality, impartiality, independence and voluntary service*¹. These principles are central to establishing and maintaining access to affected people, whether in a natural disaster or a complex emergency, such as armed conflict. Promoting and ensuring compliance with the principles are essential elements of effective humanitarian coordination.

❖ Disaster Response Principles

Project HOPE seeks to maintain the high standards of independence, effectiveness and impact in its disaster response activities and strictly observes to the following Core Humanitarian Principles:²

1. The humanitarian imperative comes first.
2. Aid is given regardless of the race, creed or nationality of the recipients and without adverse distinction of any kind. Aid priorities are calculated on the basis of need alone.
3. Aid will not be used to further a particular political or religious standpoint.
4. We shall endeavor not to act as instruments of government foreign policy.
5. We shall respect culture and custom.
6. We shall attempt to build disaster response on local capacities.
7. Ways shall be found to involve program beneficiaries in the management of relief aid.
8. Relief aid must strive to reduce future vulnerabilities to disaster as well as meeting basic needs.
9. We hold ourselves accountable to both those we seek to assist and those from whom we accept resources.
10. In our information, publicity and advertising activities, we shall recognize disaster victims as dignified human beings, not hopeless objects.

❖ Health Affairs

Ethical Guidelines for Publishing

Health Affairs, the peer-reviewed health policy journal published by Project HOPE, adheres to the following scholarly publishing guidelines standards for the field.

Committee on Publication Ethics: <https://publicationethics.org/>

¹ *Fundamental Principles of the International Red Cross and Red Crescent Movement, proclaimed in Vienna in 1965 by the 20th International Conference of the Red Cross and Red Crescent Movement.*

² *The Code of Conduct for the International Red Cross and Red Crescent Movement and Nongovernmental Organizations (NGOs) in Disaster Relief.*

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Health Affairs follows the guidance of the Committee on Publication Ethics (COPE), which outlines best practices and processes for promoting integrity in scholarly publishing. Areas of guidance include:

- [Allegations of misconduct](#)
- [Authorship and contributorship](#)
- [Complaints and appeals](#)
- [Conflicts of interest / Competing interests](#)
- [Data and reproducibility](#)
- [Ethical oversight](#)
- [Intellectual property](#), including plagiarism
- [Journal management](#)
- [Peer review processes](#)
- [Post-publication discussions and corrections](#)

Authorship

Health Affairs journal follows the authorship guidance of the International Committee of Medical Journal Editors. <http://www.icmje.org/>

I. Accountability

Compliance with the Project HOPE Code of Business Conduct is the responsibility of every Project HOPE Staff member. If a situation arises when it is difficult to determine the proper course of action, you should seek advice and counsel from your Supervisor, the Chief Compliance Officer, or the General Counsel.

Disregarding or failing to comply with this Code of Conduct will lead to disciplinary action, including termination, and appropriate legal action.

Reporting/Duty to Disclose

The Project HOPE Ethics Program seeks to maintain an environment where Project HOPE Staff have a sense of duty to disclose ethical issues, including possible Code of Business Conduct violations, and feel confident that there will be an impartial investigation without retaliation for the disclosure.

All Project HOPE Staff are responsible for ensuring compliance with the Code of Business Conduct. Project HOPE Staff have an obligation and duty to report and or disclose, in good faith, any alleged violations of the Project HOPE Code of Business Conduct. Reporting unethical conduct, illegal behavior, fraud, abuse, or waste is a mandatory obligation of all Project HOPE Staff and a contractual commitment of all contractors/vendors and partners.

If you have knowledge of conduct that could potentially harm Project HOPE, you are obligated to report such conduct. By not reporting violations of the Code of Business Conduct, you would be acting in violation of Project HOPE policy and acting contrary to the best interests of Project HOPE, both a violation of the Code of Business Conduct.

Project HOPE Code of Ethics Policy Module 1: Code of Business Conduct

Project HOPE Staff may report in good faith, without fear of retaliation, activity inconsistent with the Code of Business Conduct by contacting:

- Chief Compliance Officer/or their designee: Thelvis Pascuzzo
 - tpascuzzo@projecthope.org
 - Phone/WhatsApp: +58 414 9157988
- General Counsel: Julia Soyars
 - jsoyars@projecthope.org
 - Phone/WhatsApp: +1 540-429-1781
- Project HOPE Speak Up line: online reporting at:
<https://app.mycompliancereport.com/report?cid=PHOPE>
**Anonymous reporting available*

Project HOPE has a zero-tolerance for retaliation towards individuals who in good faith report known or suspected violations of the Code of Business Conduct.

Please remember that all Project HOPE Policies relate to the Code of Business Conduct. A violation of a Project HOPE policy is a violation of the Code of Business Conduct. All Project HOPE Staff should be aware of other policies governing behavior of staff, including but not limited to HR 200.13-G (Outside Employment), and FIN 500.1 (Gifts and Hospitality) and Legal Policies such as Anti-bribery/corruption (LEG100.2).