

COUNTERPART INTERNATIONAL'S
GLOBAL CODE OF CONDUCT

Revised: February 2020

COUNTERPART
INTERNATIONAL

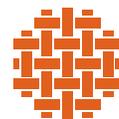


TABLE OF CONTENTS

A Message from Our CEO.....	2
About Our Code.....	3
Counterpart Values.....	4
The Code in Context.....	5
S.T.A.R. for Ethical Decision-Making Framework.....	6
Asking for Guidance and Voicing Concerns.....	7
Raising a Concern About Conduct.....	7
Donor/Supplier/Vendor Relationships.....	8
Applicability to Non-Employees & Consultants.....	8
Anti-Trust and Anti-Bribery Laws.....	8
Honoraria Payments.....	9
Fair Employment Practices.....	9
Expected Conduct Overseas.....	9
Diversity & Inclusion.....	10
Drug-Free Workplace.....	10
Workplace Safety and Security.....	11
Weapons in the Workplace.....	11
Anti-Harassment Policy.....	11
Sexual Harassment.....	12
Trafficking in Persons, Sexual Exploitation, and Abuse.....	12
Confidentiality, Proprietary Information, and Intellectual Property.....	13
Non-Disclosure of Confidential Information.....	14
Conflict of Interest.....	14
Political Activities.....	15
Accounting for Time and Expenses.....	15
Contact Information.....	17
Employee Acknowledgment.....	18
Conflict of Interest Disclosure Form.....	19

A MESSAGE FROM OUR CEO

Colleagues,

Thank you for taking this opportunity to familiarize yourself with Counterpart International's Code of Conduct and acquaint yourself with the principles that have guided Counterpart's mission and vision for more than 55 years. Whether you are a new employee or revisiting our Code, reviewing this guide and affirming your personal commitment to ethical business practices will ensure Counterpart's success for years to come.

You'll find that the Code has been updated to be more applicable to the bigger, more diverse, more innovative, and more global organization we have become in recent years. Counterpart has an ambitious mission - to make a positive, lasting difference in the world by developing leaders, strengthening networks, and fostering partnerships to build stronger and more resilient communities.



If we are to succeed in this mission, it is critical that we adhere to the company's four fundamental values: clarity of purpose, integrity, teamwork, and excellence.

It is no accident that clarity of purpose comes first on that list. At Counterpart, we know that every decision we make contributes to achieving our purpose and every action is in service to our beneficiaries and partners. We strive to do good in the world, but our reputation and all our good work can be put in jeopardy by a single act that falls short of our high ethical standards. Therefore, we have a zero-tolerance policy for unethical behavior.

I expect all Counterpart employees and consultants to review this Code and absorb its guidance. We have built an inclusive, accountable, and ethical culture over the last several decades, and we have grown because of it. Our values are at the core of how we interact with clients, partners, employees, and vendors around the world. As a Counterpart employee, it is your job to sustain this spirit of excellence wherever we work.

Suggestions on how we can continue to improve this document are always welcome, and should be directed to Wendy Bradford, our Senior Director of Human Resources.

Best wishes,

Ann C. Hudock, DPhil
President & CEO

ABOUT OUR CODE

Our Code of Conduct empowers all Counterpart International employees worldwide to make ethical decisions that impact our work positively.

This Code applies to all of us. Anytime this document refers to “we,” “our,” or “us,” it is referring to all employees Counterpart International, including Headquarters and Field Offices.

The Code of Conduct provides an overview of operating principles and guidelines as well as some of the legal and ethical standards we are all expected to follow every day. As ambassadors of the Counterpart brand, we must strive to meet the company’s expectations regarding honesty, integrity, excellence, and responsible behavior.

While business and customs vary and everyone who works for Counterpart International is unique, certain guidelines and standards are shared wherever the employee is located. Counterpart operates in countries across the globe and our colleagues are citizens of nations with unique laws, regulations and customs; nevertheless, we are committed to conducting business in accordance with the highest standards of ethical conduct that transcend national boundaries.

As employees, directors, and officers of Counterpart, you are required to read, commit to, and follow the Code of Conduct as a condition of employment. This is a centerpiece of our culture and values, and our commitment to our staff, partners, and clients. Violation of any of these principles may result in termination of employment. You will be asked to review and acknowledge your commitment to these principles annually in writing. If you suspect any employee, donor, supplier, vendor, customer, or manager is in violation of any of these principles, it is your responsibility to notify your manager or Human Resources immediately.

KEYS TO COMPLIANCE

- Follow the law.
- Be honest, fair, and trustworthy in all your Counterpart activities and relationships.
- Communicate openly and honestly.
- Deal fairly and equitably with the government, donors, suppliers, vendors, and competitors.
- Make sound decisions.
- Foster an atmosphere in which fair employment practices extend to every member of the diverse Counterpart community.
- Strive to create a safe workplace and protect the environment.
- Foster a culture where ethical conduct is recognized, valued, and exemplified by all Counterpart employees, managers, consultants, and contractors.
- Increase and spread awareness about integrity issues.

COUNTERPART VALUES

Clarity of Purpose: Every decision we make contributes to achieving our purpose.

- Every action is in service to our beneficiaries.
- We demonstrate alignment of daily purpose with mission.
- We maximize impact for our beneficiaries.
- We recognize the contributions every team makes to our purpose.

Integrity: We are honest, ethical, and fair in all our dealings and treat each other with care and respect.

- We think beyond ourselves and treat everyone with respect in word and action.
- We maintain high ethical standards.
- We leave things better than we found them.

Teamwork: Our success depends on working collaboratively with all our people across the globe.

- We give people a chance and acknowledge their value.
- We support each other to contribute and engage.
- We share responsibility, challenges, and solutions in the spirit of collaboration and candor.
- We give and ask for help.
- We communicate clearly, openly, and in a timely manner.

Excellence: We build exemplary client solutions, informed by evidence, that drive our continuous learning.

- We are curious and ask questions.
- We commit to setting a higher standard.
- We actively mentor, helping to develop others and ourselves.
- We celebrate success, innovation, initiative, and learning.

THE CODE IN CONTEXT

While we educate and inform ourselves and our partners on ethical behaviors and issues, it is important to remember that this Code is not meant to provide specific guidance on every situation we may face along the way to success, but rather it guides us towards legal, ethical, and compliant actions, while providing principle-based guidance to encourage us to consult with the relevant parties and speak up.

Deciding to report a violation is not an easy task. Therefore, we rely on the **S.T.A.R.** decision-making process (**Stop, Think, Act, Report**) to help us do the right thing.

Should local laws or regulations provide a more restrictive framework than this Code, local laws or regulations govern. Additional policies from the HQ and Field Office HR handbooks, as well as local policies and supplemental guidance complement the guidelines embodied in this Code of Conduct.

WHAT DOES IT MEAN TO MAKE A REPORT “IN GOOD FAITH”?

A good faith report means a report of wrongdoing or abuse that you reasonably believe is true and in violation of Counterpart’s Code of Conduct, policies, or procedures.

WHERE CAN I FIND COMPANY POLICIES?

You can find many of our global and HQ policies on Counterpart’s Sharepoint Intranet site and Ultipro’s welcome page. You can also ask your manager or your HR team for copies of applicable policies.

S.T.A.R. FOR ETHICAL DECISION-MAKING FRAMEWORK

1. STOP

- a. Be Alert: Are you witnessing a violation or being asked to do something against the Code of Conduct and values of Counterpart?
 - b. Are you familiar with the policies and procedures?
 - c. Are you stuck? Unsure on how to decide because of ethical implications?
 - d. Would my name or my employer's reputation be affected if I do nothing?
- » **Refer to the Code of Conduct.**

2. THINK

- a. Assess the situation and weigh your options: Who is affected? What are the options?
 - b. How can I explain my actions or failure to act? Is there an alternative route?
 - c. Does it feel right? Is it legal? Is it compliant with the donor's regulations, Counterpart's policies and procedures, mission and values, and/or the Code of Conduct?
 - d. Who can you consult before acting?
- » **Stay Calm, keep your composure, sleep on it (how did it feel?), decide.**

3. ACT

- a. We recognize that this may be the hardest step - how do you feel about it?
 - b. Maintain your courage, diplomacy, and stick to the facts.
 - c. Are you confident with your decision to proceed? Is it in good faith?
- » **Organize your notes, facts, and timelines.**

4. REPORT

- a. Report your concerns to the appropriate party: Manager, HR, the Ethics Hotline.
 - b. Communicate your issue clearly and state the desired outcome.
 - c. Follow up, reflect on the lessons learned, and what change needs to occur
- » **Maintain confidentiality and report any acts of suspected retaliation.**

ASKING FOR GUIDANCE AND VOICING CONCERNS

Counterpart's core values require compliance with the law, as well as ethical conduct. If you feel the terms of this Code have not been met, need access to policies, or have any questions, please ask for guidance or voice your concerns by contacting any of the following resources:

- Your manager or your manager's supervisor
- Your HR Department

RAISING A CONCERN ABOUT CONDUCT

As a condition of your employment, you are required to raise concerns about possible violations of Counterpart's Code of Conduct. You are free to raise the concern with the most appropriate party, which may include your manager, Human Resources, or the Ethics Hotline. No concern or issue raised will in anyway jeopardize your employment with Counterpart, only a failure to do so will.

To report violations of policies or the Code, employees can use the EthicsPoint Hotline to ask questions or raise concerns. The Hotline is available 24 hours a day, seven days a week, and an interpreter can be made available upon request. More information about EthicsPoint can be found here or <https://secure.ethicspoint.com/domain/media/en/gui/49634/faq.pdf>

You may use either of the following two methods to submit a report:

- Select the "Make a Report" link at the top of the EthicsPoint website: <https://secure.ethicspoint.com/domain/media/en/gui/49634/index.html>
- Or dial toll-free, within the United States, Guam, Puerto Rico, and Canada: 888-475-2533

Your concerns will be taken seriously, and all information provided to the EthicsPoint hotline will be treated in a confidential manner. Please be aware that information provided through the online tool is directed to the Chief Executive Officer at HQ. Every reasonable effort will be made to protect the security of any personal data collected and to avoid unauthorized use or disclosure of such data. Counterpart will investigate all reported incidents of violation of the Code of Conduct and will take appropriate action based on the findings.

DONOR/SUPPLIER/VENDOR RELATIONSHIPS

You agree to deal fairly and honestly with the government, donors, suppliers, and vendors. You must give suppliers and vendors a fair opportunity to compete for Counterpart business by following Counterpart procedures. You must respect the confidential information and intellectual property of all donors, suppliers, and vendors. You must provide a competitive opportunity to suppliers and vendors to earn a share of Counterpart's programs and purchasing volume. Small businesses and businesses owned by the disadvantaged, minorities, and women will be given the opportunity to compete for Counterpart's business. Counterpart, and its employee representatives, will only contract with donors, grantees, suppliers, and vendors who comply with local, state, and federal laws and regulations and who meet Counterpart's standards of doing business.

CAN I SHOW GRATITUDE FOR A VENDOR WITH A GIFT? WHAT IS APPROPRIATE?

Giving gifts means setting a tone for how we conduct business. The rule of thumb is to limit any such gifts to or from any vendor or business associate to US \$25 per year. Be mindful of the vendor's own policy on gifts and entertainment. Respect of the policies should be mutual.

APPLICABILITY TO NON-EMPLOYEES & CONSULTANTS

A fair portion of our work is completed by outside consultants or contractors who are not Counterpart International employees. Non-employees who work on our behalf can cause as much or more risk to the company if they violate our policies and Code, the law, or regulations we are subject to, and that applies to our work as service providers to the United States government (USG). While contractors and consultants are not our employees, and therefore do not fall specifically under our Code of Conduct, it is important for all Counterpart International staff who engage or hire consultants and/or contractors on behalf of the company to ensure that the consultants and/or contractors are fully informed and made aware of our policies and procedures, Code of Conduct, and requirements, including how to seek further guidance about compliance and ethics questions.

WHAT IS A BRIBE?

A **bribe** is not only an exchange of money. It can be anything of value and can take many forms: Fees and/or commissions to involved parties either directly or indirectly; in-kind and non-cash goods: (gifts, event tickets, travel, accommodation). Consulting and/or employment opportunities for family members outside the standard hiring process.

ANTI-TRUST AND ANTI-BRIBERY LAWS

Everyone must comply with antitrust laws that regulate the conduct and organization of business to promote fair competition for the benefit of consumers. Counterpart, like any other organization, is subject to both U.S. and non-U.S. laws, especially of those countries where we operate, that prohibit bribery in virtually every kind of commercial setting. The rule is simple – don't bribe anybody, anytime, for any reason.

HONORARIA PAYMENTS

An honorarium is a payment received by a Counterpart employee for making a speech, publishing an article, or being a panelist or serving as subject matter expert at a conference, convention, meeting, social event, meal, or similar gathering at the request of another entity. The employee may be allowed to retain honoraria payments up to a maximum amount of \$1500 per calendar year, following an approved request. Questions and requests about honoraria payments must be directed to Human Resources.

FAIR EMPLOYMENT PRACTICES

We believe in fair and equitable employment at Counterpart. Our continued success depends on ensuring equal access to employment opportunities and giving employees a fair chance to contribute their talents and abilities without discrimination.

With a global presence and hundreds of employees, we strive to be a company where the best people want to work, where people are hired and advanced on their knowledge, skills, abilities, and merits, and where opportunities to develop are available. It is the policy of Counterpart International to provide equal employment opportunities and to not discriminate against any employee or applicant because of the person's race, religion, color, sex (including pregnancy, gender identity, and sexual orientation), parental status, national origin, age, disability, family medical history or genetic information, political affiliation, military service, gender identity or gender expression or other non-merit based factors. These protections extend to all management practices and decisions, including recruitment and hiring practices, appraisal systems, promotions, and training and career development programs.

EXPECTED CONDUCT OVERSEAS

Employees, while in the cooperating country, are expected to show respect for its conventions, customs, and institutions, to abide by applicable laws and regulations, and not to interfere in its internal political affairs. Counterpart International carries out important work on behalf of various U.S government agencies and other international donors, including the United States Foreign Assistance Program. As such, Counterpart International is committed to ensuring that our operations and those of

our employees in the cooperating country will be carried out in such a manner as to be fully commensurate with the responsibility which this entails. This responsibility includes ensuring that employees act in a manner consistent with the standards for United Nations (UN) employees in Section 3 of the UN Secretary- General’s Bulletin - Special Measures for Protection from Sexual Exploitation and Sexual Abuse (ST/SGB/2003/13).

DIVERSITY & INCLUSION

Counterpart international thrives on the diversity of its talented workforce. We see diversity as a competitive global advantage as we continuously expand and grow. Our culture promotes diversity in thought and action within the compliance framework in which we operate. We seek to be inclusive of all people and value the unique contributions, differences, strengths, abilities, and skills that result from having such a diverse workforce. Our inclusive approach to diversity extends to our vendors and suppliers.

Grounded in our respect for the courage and determination of people to drive their own destinies, our diverse team is working together on behalf of communities around the world.

DRUG-FREE WORKPLACE

Counterpart maintains a drug-free workplace in all our offices around the world. Counterpart strictly prohibits and deems the possession, use, sale, attempted sale, purchase, attempted purchase, conveyance, distribution, transfer, dispensation, cultivation, and/or manufacture of illicit drugs or other intoxicants at any time, a serious misconduct. Possession of alcohol while present on Counterpart premises and the misuse or abuse of alcohol while an employee is off-premises but is conducting business or representing Counterpart in any way is prohibited.

We comply with local and international laws, and internal policies have been established to help maintain secure and healthy conditions in the workplace. “Illicit drugs” includes all drugs, narcotics, and intoxicants for which possession or misuse is illegal under federal and/or local laws, including questionably obtained prescription medications.

KEYS TO COMPLIANCE

- Protect Counterpart’s assets and reputation.
- Avoid personal liability.
- Safeguard the security of people.
- Comply with all applicable laws, regulations, and company policies.
- Follow the rigorous business processes and procedures established.
- Communicate with integrity always. Be timely and truthful.
- Preserve all required program, donor, and financial documents and records digitally.

WORKPLACE SAFETY AND SECURITY

We expect you to follow all safety rules and practices; cooperate with officials who enforce these rules and practices; take necessary steps to protect yourselves and those you serve and work with. Everyone must attend required safety trainings and report immediately all accidents, injuries and unsafe practices or conditions. It is everyone's responsibility to enforce workplace security measures and to become familiar with and follow any work safety information and training provided to you.

Counterpart strives to maintain a safe and secure workplace and does not tolerate any acts or threats of violence in the workplace. Threats, threatening language, or any other acts of aggression or violence made toward or by any employee will not be tolerated. For the purposes of this policy, a threat includes any verbal or physical provocation, harassment or abuse, attempts at intimidating or instilling fear in others, menacing gestures, flashing of weapons, stalking, or any other hostile, aggressive, injurious, and/or destructive actions undertaken for domination or intimidation.

WEAPONS IN THE WORKPLACE

Counterpart prohibits all persons from carrying or transporting a handgun, firearm, or legally controlled or prohibited weapon of any kind onto company property, regardless of whether the person is licensed to carry the weapon. Employees are also prohibited from carrying a weapon while performing their job for Counterpart, whether they are on Counterpart property at the time or not, and whether they are licensed to carry a handgun or not. Weapons are prohibited at any Counterpart-sponsored function. Prohibited weapons include any form of weapon or explosive restricted under local, state, or federal regulation. This includes all firearms, illegal knives, or other weapons covered by the law (legal chemical-dispensing devices such as pepper sprays that are sold commercially for personal protections are not covered by this clause).

ANTI-HARASSMENT POLICY

Counterpart is proud of its commitment to provide a collegial workplace in which all individuals are treated with respect and dignity. Counterpart fosters a professional work environment and takes steps to prevent unlawful harassment of any kind. Harassment based on race, color, ethnicity, national origin, religion, age, disability, medical condition, veteran status, marital status, gender, sexual orientation, gender identity or gender expression, or any other characteristic prohibited under domestic law is illegal and is a violation of Counterpart policy. Counterpart

MY SUPERVISOR RAISES HIS VOICE CONSTANTLY AND QUESTIONS MY QUALIFICATIONS WHEN I NEED CLARIFICATIONS. WHAT CAN I DO?

This behavior may be perceived as bullying and disrespectful on the surface and in contradiction with our values and the Code of Conduct. Contact your Human Resources department or refer to the S.T.A.R model for guidance.

prohibits harassment of its employees by anyone: supervisors, co-workers, clients, vendors, visitors, or any other business contacts. Counterpart employees similarly are prohibited from harassing co-workers, clients, vendors, visitors, or any other business contacts.

COUNTERPART INTERNATIONAL WILL NOT TOLERATE HARASSMENT, INTIMIDATION, OR RETALIATION AGAINST ANYONE WHO:

- Filed a complaint
- Assisted or participated in an investigation;
- Opposed any unlawful act or practice by any federal, state, or local laws requiring equal opportunity; or
- Exercised any other legal right protected by federal, state, or local law requiring equal opportunity.

SEXUAL HARASSMENT

Sexual harassment can be defined as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when (1) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; (2) submission to, or rejection of, such conduct by an individual is used as the basis for employment decisions affecting such individual; or (3) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment.

TRAFFICKING IN PERSONS, SEXUAL EXPLOITATION, AND ABUSE

Counterpart is committed to preventing trafficking in persons and sexual exploitation and abuse in our programs and engagements with partners around the globe. Far from being a soft issue, trafficking - a modern day form of slavery - constitutes a violation of human rights in which victims are deprived of their fundamental freedoms. Trafficking in Persons is a criminal offense that exists in most countries in which Counterpart operates. Such acts expose Counterpart, its employees, and business partners to the risk of prosecution, fines, and imprisonment, as well as endangering Counterpart's reputation. Counterpart has a zero tolerance approach to acts of perceived or actual human trafficking by any of its employees or by business partners working on its behalf. Always be alert to possible human rights violations and always check your actions to ensure that they do not violate or contradict any of the basic Trafficking in Persons principles noted above. If you suspect a human rights abuse within Counterpart, report it immediately.

Counterpart expects all employees and partners to refrain from:

- Engaging in any form of trafficking in persons
- Soliciting or paying for sex
- Forcing anyone to work against their will
- Withholding, misusing, destroying, concealing, or otherwise denying access to the employee's identity or immigration documents (e.g., passports, driver's license, other forms of identification)
- Misrepresenting a job while recruiting or hiring for fee or bribe
- Developing physical or sexual relationships with children

Sexual exploitation and abuse by any Counterpart employee, consultant, subcontractor, supplier, or partner constitutes gross misconduct and is grounds for immediate termination or end of partnership.

WHAT IF MY MANAGER ASKS ME TO PERFORM A TASK THAT I BELIEVE VIOLATES THE CODE?

Raise your concerns openly and honestly with your manager. If you are not satisfied with your manager's response, or otherwise feel uncomfortable speaking to your manager, raise the issue through your HR representative. You should never knowingly violate our Code, a policy, or a law because a manager directs you to do so or because you failed to ask for guidance.

CONFIDENTIALITY, PROPRIETARY INFORMATION, AND INTELLECTUAL PROPERTY

Counterpart is engaged in the highly competitive business of non-governmental international development. Like any other company, we want to safeguard knowledge products developed over the years and expect that employees will adhere to confidentiality and will not share Counterpart materials with anyone outside of our organization.

The term "confidential information" means any data, information and/or documentation, maintained in any form, which is valuable to Counterpart, its affiliates or any client of Counterpart and not generally known to the public, including but not limited to: information on business and proposal strategy, proposal-specific information, partner information, information on use of technologies and platforms for business development, consultant and staff information, financial information, supply and service information, marketing and strategic positioning information, and client-customer and project information.

Whether confidential information is received verbally, online, on paper, or via other mediums, it is critical to safeguard it. It is incumbent upon us to do the right thing and be trustworthy.

NON-DISCLOSURE OF CONFIDENTIAL INFORMATION

Employee agrees not to disclose or disseminate to any other person, organization, or entity, any confidential information during employment and at any time after the cessation of that employment. The obligations set forth herein shall not apply to any otherwise confidential information, which shall have become generally known to competitors of the employer through no act or omission of the employee.

- All of us are responsible for protecting confidential information entrusted to us.
- Physical copies of confidential information are carefully stored and monitored.
- Divulging confidential information, is a serious violation of the standards.
- We use Counterpart's vetted systems in achieving our work.
- When in public spaces, we are careful when discussing client matters.
- We promptly report unintended disclosure of confidential information to the appropriate parties.

CONFLICT OF INTEREST

We must avoid conflicts of interest or the appearance of a conflict between personal and company interest. A conflict of interest exists any time personal interest or circumstances are a factor or improper influencer in a business decision relating to our work at Counterpart.

During employment with Counterpart International, it is expected that all Counterpart employees will devote their best efforts and entire time to advance the interests of Counterpart. An employee will not directly or indirectly, on their behalf or on the behalf of a third party, engage in any manner in any business that provides like services as Counterpart, either in existence or in development, other than as an employee of Counterpart. During employment, employees shall not solely or jointly with others undertake planning of any business activity, competitive with the business activities of Counterpart, and directly or indirectly engage or participate in any activities in conflict with the best interests of Counterpart without full disclosure and approval. Counterpart employees are expected to disclose any actual or possible conflict of interest to their manager and Human Resources per our standard procedure.

POLITICAL ACTIVITIES

Employees and non-employees are prohibited from using Counterpart International's resources for personal political activities. Our work involves a great deal of engagement with people and communities. While Counterpart supports and encourages involvement in community activities, which may include political activities, we cannot use company funds or resources, or receive company reimbursement, for personal political activities, including contributions to political candidates or parties. We cannot represent our individual political affiliations as those of Counterpart and must avoid even the appearance of endorsing, supporting, or opposing a political position, candidate, agenda, product, or party. Counterpart is cognizant of and follows the political contributions reporting requirements.

CAN I SOLICIT CAMPAIGN CONTRIBUTIONS FOR A CANDIDATE I SUPPORT?

You may solicit campaign contributions on your own time. However, you may never solicit campaign contributions from those you supervise or those you know have a business relationship with Counterpart International. You must consult with HR if you have certain purchasing rights or delegation of authority on behalf of Counterpart.

ACCOUNTING FOR TIME AND EXPENSES

Counterpart works on behalf of various donors and government agencies, so accurate time and expense recording is a requirement and a condition of employment. We must be meticulous in how we report and track our work and ensure proper allocation of expenses to the right accounts. All employees must record their time and travel regularly and accurately. Maintaining your expenses and travel receipts is critical to ensuring compliance with internal policies and audit requirements.

I WORKED MORE THAN THE HOURS ALLOWED ON THE BUDGET AND MY MANAGER ASKED ME TO "REVISE" MY TIMESHEET TO REDUCE THEM. IS THAT APPROPRIATE?

You should report the correct hours worked, no less, no more. Let your supervisor know that you need more hours for the task so budgets can be revised. If this happens again, notify HR.

EXAMPLES OF UNACCEPTABLE CONDUCT

- Supplying false or misleading information when applying for employment or at any time during your employment.
- Theft or inappropriate removal or possession of company property.
- Altering, destroying, misrepresenting, carelessly or willfully misplacing, discarding, or falsifying Counterpart's records.
- Destruction or defacing of property of Counterpart or fellow employees.
- Possession, use, distribution, or being under the influence of illegal drugs at any time while conducting Counterpart business or while on Counterpart property.
- Possession of weapons, firearms, or ammunition on Counterpart property.
- Engaging in any act of discourteous and/or any illegal, unethical conduct.
- Deliberately or negligently causing injury to another person.
- Sexual or other unlawful harassment, soliciting persons for such purposes, or aiding and/or abetting in such conduct.
- Insubordination or failure to perform one's duties.
- Violating Counterpart's equal employment opportunity policies.
- Violating any policies or procedures contained in the Handbook or any other conduct deemed unprofessional, improper or disruptive by Counterpart.

Violations or breaches of this Code, policies, or of the law are grounds for disciplinary action up to and including termination. Counterpart reserves the right to review and amend the Code of Conduct and policies as required, so make sure you are referencing the most up-to-date version. Other detailed policies related to the topics covered in this Code of Conduct can be found in the HR Employee Handbook on the Sharepoint Intranet.

CONTACT INFORMATION

Counterpart Headquarters

2345 Crystal Drive, Suite 301
Arlington, VA 22202

Phone: 571.447.5700
Fax: 703.412.5035

Web Contact

counterpart.org/contact-us

EthicsPoint Hotline

Submit your issues or questions online:

<https://secure.ethicspoint.com/domain/media/en/gui/49634/index.html>

Or dial toll-free, within the United States, Guam, Puerto Rico and Canada:
888-475-2533

Email Your Concerns

whistleblower@counterpart.org

EMPLOYEE ACKNOWLEDGEMENT

All Counterpart International employees are required to read and follow the Counterpart Code of Conduct.

I hereby acknowledge that I have read and understand the Counterpart International Code of Conduct and will be responsible for obtaining all future amendments and modifications thereto.

I further acknowledge that I have read and understand all my obligations, duties, and responsibilities under each provision of the Counterpart International Code of Conduct and will read and understand all my obligations, duties, and responsibilities under all future amendments and modifications thereto.

I understand that violations of the Code of Conduct or Counterpart International Policies may result in disciplinary action including suspension without pay and/or discharge. I certify that this is a true and correct statement by my signature below:

Employee Printed Name

Employee Signature

Date

CONFLICT OF INTEREST DISCLOSURE FORM

Date: _____

Name: _____

Position: _____

Please describe below any relationships (with coworkers, donors, beneficiaries, vendors, board members), any transactions, positions you hold (volunteer or otherwise), or circumstances that you believe could contribute to a conflict of interest between Counterpart International Inc. and your personal interests, financial or otherwise:

_____ I have no conflict of interest to report

_____ I have the following conflict of interest to report.

Please specify other nonprofit and for-profit boards you (and your spouse/domestic partner) sit on; any for-profit businesses for which you or an immediate family member/domestic partner are an officer or director or a majority shareholder of, an owner of, or derive financial benefit from. Please provide the name of the company/employer and the type of business/businesses you or a family member/domestic partner are affiliated with):

1. _____
2. _____
3. _____
4. _____

I hereby certify that the information set forth above is true and complete to the best of my knowledge. I have reviewed and agree to abide by the Policy of Conflict of Interest. In addition, should a conflict of Interest arise in the future, apparent or otherwise, I acknowledge that I must disclose that immediately to HR.

Signature: _____

Date _____