

COURAGE
INTEGRITY
COLLABORATION
INNOVATION

RESPECT



Pathfinder
INTERNATIONAL

**Code of
Conduct**

NOVEMBER 2019

Table of Contents

Introduction	1
Responsibilities	2
Making the Right Decision	3
Our Values	4
▪ Integrity	5
▪ Respect	6
▪ Courage	7
▪ Collaboration	8
▪ Innovation	9
Reporting Misconduct	10
Certification	11



Message from Our President and CEO

Dear Pathfinders,

I am pleased to share with you the first edition of Pathfinder International's Code of Conduct. While the Code is new, it is based on the same values that have guided us for more than sixty years: Integrity, Respect, Courage, Collaboration, and Innovation. These values are the foundation for how we work with each other, with our donors and partners, with those we serve, and with society at large.

Pathfinder's mission has never been more important. In these challenging times, we continue to champion sexual and reproductive health and rights worldwide, mobilizing communities most in need to break through barriers and forge their own path to a healthier future. And our vision has never been more compelling: a world where everyone has access to contraception, where there are zero new HIV infections, where no woman dies from preventable pregnancy-related complications, and where everyone leads a healthy sexual and reproductive life. We not only imagine such a world, we work every day to move closer to making it a reality.

How we work to pursue our mission and achieve our vision is just as important as what we accomplish. This Code of Conduct will help guide you in making the right decisions and taking the right actions, consistent with our values and policies, and with the high expectations we share for each other. I urge you to become familiar with it, to refer to it whenever you face a difficult choice, and to refresh your understanding by returning to it often.

Thank you for your commitment to upholding Pathfinder's values.



Yours,

A handwritten signature in black ink, appearing to read "Lois Quam".

Lois Quam

Pathfinder has always been committed to the highest standards of ethical conduct in everything we do and everywhere we work.

1 Introduction

This commitment is expressed in many ways, including global and country policies, employee handbooks, project documents, trainings, and leadership communications. This Code of Conduct reflects the same commitment.

The purpose of the Code of Conduct is to bring together in one place the fundamental principles that guide Pathfinders in making decisions and taking actions—decisions and actions that are consistent with our values and with the laws and other requirements that apply to us. While it refers to many policies, the Code is not meant to restate all of their specific terms or to refer to all of our policies and procedures. When confronted with a new or difficult situation you should review all applicable policies, procedures and guidance (see, for example, the Policies Center on iShare). And you should always ask for help from your manager or request direction from other available resources if you have questions or are uncertain about what to do.

The Code of Conduct is not just another policy or set of requirements. It summarizes the principles that must be an integral part of how you conduct yourself. Ethical and responsible behavior cannot be separated from Pathfinder's work: it is a fundamental part of the commitment that each of us makes and must be woven into everything you do. You help Pathfinder succeed in its mission by making a commitment to ethical decisions and actions, and meeting that commitment every day.



The Code of Conduct is not just another policy or set of requirements.

It summarizes the principles that must be an integral part of how you conduct yourself.

The Code of Conduct has the following sections:

1 Responsibilities.

- This section describes in general terms your responsibility for ethical conduct, as well as the responsibilities of your managers, other leaders, and Pathfinder as an organization.

2 Making the Right Decision.

- This section provides a framework for how to make decisions in an ethical manner as well as information about the resources you can use to obtain guidance and answer your questions.

3 Our Values.

- This section sets forth the Pathfinder values and links them to specific principles and policies that apply to how we conduct ourselves with each other, with donors and partners, with government officials, and with those whom we serve.

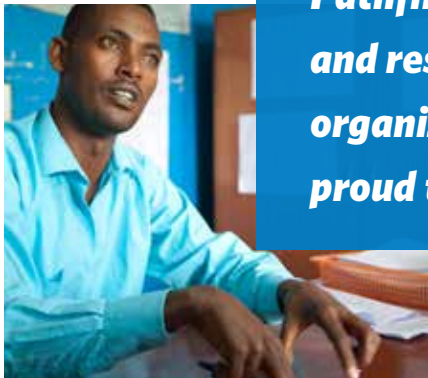
4 Reporting Misconduct.

- This section provides information on the many channels available for reporting misconduct.

5 Certification.

- Every Pathfinder must complete a certification of compliance at onboarding and each year thereafter.

Pathfinder is committed to being a trustworthy, fair, and reliable organization. This means that we aspire to act ethically and legally at all times, and to meet the highest expectations that societies, donors, partners, governments, and our own employees have for us.



Pathfinder's commitment and responsibility is to be an organization that makes you proud to be a Pathfinder.

We will provide the tools—policies, training, and guidance—that you need to conduct yourself ethically and legally, and to meet the expectations of our communities and stakeholders.

Pathfinder only acts through its employees and representatives. In other words, you are Pathfinder. The organization can only be ethical and comply with all the rules that apply to us if you and every other Pathfinder conduct yourselves the right way. That is why it is your responsibility to commit to proper conduct—for the organization and for one another.

The following **RACI** provides a general framework to help clarify responsibilities. It does not substitute for specifics within individual policies.

R RESPONSIBLE



- Each employee is responsible for reading and following the Code of Conduct and Pathfinder's policies as well as for knowing and complying with the laws and regulations, donor requirements, and other rules that apply to your work. Failing to comply can be cause for disciplinary action, up to and including termination. Not knowing about a policy or other requirement is not an acceptable excuse.
- Managers, senior leaders, and executives are responsible for fostering a culture of ethics and compliance and for demonstrating their commitment to the Code of Conduct.
- Business units and Country Offices are responsible for providing training and guidance on the policies and activities that they own or manage.

A ACCOUNTABLE

- Managers and those in more senior positions are accountable for the actions of all of the employees reporting to them, including for employees' compliance with the Code of Conduct and all other applicable policies and rules. This accountability includes employees reporting up through one or more intermediate managers, not just direct reports.

C CONSULTED

- Whenever you have a question, you should consult with your manager or the owner of the relevant policy, or anyone else who may be able to assist. If you don't know who to contact for guidance, seek guidance from the staff in the Compliance or Human Resources business unit. See "Making the Right Decision."

I INFORMED

- Employees must inform someone else whenever they become aware of suspected misconduct. There are multiple channels for reporting, and protection against retaliation is assured. See "Reporting Misconduct."

3 Making the Right Decision

Every day, you make choices about how you conduct yourself in the workplace and how you do your job. Most of the time, the policies and rules that apply are clear. Occasionally, however, you may face more complicated or difficult situations, where it is harder to know what to do.

Pathfinder's Code of Conduct and policies cannot possibly cover every potential situation in detail. But there is a framework for how to make decision.

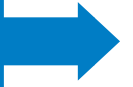
Two overriding principles apply:



1. Make ethical choices, and



2. ASK for help.



Making Ethical Choices

An ethical decision doesn't just comply with Pathfinder's policies, it is an expression of our values. It is the right thing to do.

Working through these questions can help you decide what to do and to make sure that you are acting ethically and consistently with Pathfinder's values.

Here are some questions to ask yourself in order to make an ethical decision:

Do my decision and conduct live up to the trust that other people place in Pathfinder and in me?

Would donors regard my decision and conduct as reasonable and appropriate?

Could my decision and conduct harm anyone, and what can I do to avoid harm?

How would it look if my decision and conduct were reported in a newspaper, on television, or on social media?
How would this affect Pathfinder's reputation, and my own?

Would I be proud?
Would I be willing to stand behind what I did and be held accountable for it?

Am I confident that I know the policies and other rules which apply?
Are my decision and conduct consistent with those guidelines?

If you are unsure, ask for help (see next page). >

Ask for Help

There are many resources available to help you make the right decision. Some resources may be especially relevant to a situation or question, or you may have a good reason for not asking a specific person for guidance (if the question involves their conduct, for example).

You are never alone; you should always ask for help if you are uncertain what to do.

Here are examples of where you can go for guidance:



- **MANAGEMENT.** You can go to your direct manager or anyone up the line of management, including your Country Director, project director or business unit lead, or a member of the Management Team (Chief Executive Officer, Chief Operating Officer, Chief Financial Officer, or Chief Legal Officer).



- **COMPLIANCE.** You can go to your local compliance officer, to Global Compliance (compliance@pathfinder.org or WhatsApp at +1-617-972-1316), or to the Chief Legal Officer. They can provide advice and guidance, and direct you to the relevant policies.



- **HUMAN RESOURCES.** Your HR manager can be especially helpful with workplace and employment-related questions.



- **FINANCE.** Your finance manager can be especially helpful with questions relating to Pathfinder's financial policies and procedures.



- **GRANTS, CONTRACTS, AND PROCUREMENT.** Members of the Grants, Contracts, and Procurement business unit can answer questions relating to donor requirements as well as the procurement process.



- **POLICY OWNERS.** If you have a question about a specific policy, you can go to the business unit or specific person identified as the policy owner. For example, the Information Technology business unit can provide guidance on cybersecurity.

With the help of these resources, you can be confident in making ethical decisions that are consistent with Pathfinder's values.

Pathfinder's values are **Integrity, Respect, Courage, Collaboration, and Innovation.**

They define the mindset and behaviors we expect of ourselves and each other.

They reflect how we work together to achieve Pathfinder's mission, from program design to implementation and everything else we do to support and carry out that work.

The policies, laws, donor requirements, and other rules that apply to our activities can be complex. At the same time, all of these requirements fundamentally reflect Pathfinder's values. When you comply with the rules, you live up to Pathfinder's values. Training and guidance, including this Code of Conduct, are essential to your understanding of the rules in order to comply with them.

This section of the Code of Conduct describes our values in ways that can help you make ethical decisions, and it links our values to principles and policies that apply to our work and conduct. It is important to note

that this section does not list every Pathfinder policy, but only provides examples. In the spirit of continuous improvement, we are revising policies, developing new ones, and retiring those that are unnecessary. The Code provides a general framework, and you should always look to Pathfinder's policies and other rules for specific requirements.

5 Our Values: **INTEGRITY**

Integrity means holding ourselves and others accountable for acting honestly and in the best interests of Pathfinder, our donors, and those we serve. It means living up to the expectations others have for us. It means playing by the rules and doing the right thing, whether or not anyone else finds out.

Here are examples of what integrity means for you and your work at Pathfinder.

FRAUD. Never engage in fraud. Fraud means falsifying or concealing information for personal or financial gain. Examples include falsified travel vouchers, invoices, time sheets, receipts, or project data. Other examples include lying on an employment

application, making or causing any false entry in Pathfinder's financial records, or making any kind of false certification. Intentionally engaging in or approving a transaction in violation of the Delegation of Authority is also fraud.

CONFLICT OF INTEREST. You must put Pathfinder's interests before your own when you make business decisions, and avoid even the appearance of a conflict of interest. This means, for example, disclosing, in advance, any situation in which you or a family member could benefit from an action

by Pathfinder, such as a hiring, procurement, or grant-making decision. It means avoiding any situation in which someone could question why you were involved in a decision or whether you could act in a fair and unbiased way—even if you did make a proper decision.



Integrity

**BRIBERY AND CORRUPTION.**

Never engage in bribery or corruption. Bribery means offering or providing someone with a payment, gift, hospitality, charitable or political contribution, or anything else of value to obtain an improper business advantage. Corruption includes authorizing improper payments, agreeing to improper requests or demands by third parties, or abusing your own position at Pathfinder to obtain money or some other personal benefit.

PROPOSAL INTEGRITY. Do not improperly obtain, share or misuse information in connection with bids or proposals in violation of US Government

or other donor rules. Do not offer or provide gifts, employment opportunities, or anything else of value to anyone involved in evaluating a Pathfinder bid or proposal.

Examples of relevant Pathfinder policies:

- Fraud Policy
- Delegation of Authority Policy and Procedure
- Conflict of Interest Policy
- Employment of Relatives Policy
- Anti-Bribery and Anti-Corruption Policy

Integrity

Respect means **being considerate of others and treating them the way they wish to be treated.** It means interacting appropriately, fairly and properly with colleagues, partners, those we serve, and everyone else with whom we work. It means never mistreating or taking advantage of anyone.

Here are examples of what respect means for you and your work at Pathfinder.

SAFEGUARDING. Pathfinder is committed to the principle of safeguarding, which means protecting people from harm. Never bully, harass, exploit, abuse, or otherwise harm a Pathfinder colleague, beneficiary, subawardee, or anyone else. This includes (but is not limited to) sexually exploiting or abusing another individual. Do not

use or attempt to use your position of authority or another's vulnerability for sexual purposes. Do not make or threaten sexual contact of any kind by force or under unequal or coercive conditions. Never engage in any activity relating to human trafficking, including recruiting persons for commercial sex acts, subjecting others to involuntary

servitude or slavery, and transporting or harboring individuals for such activities. Safeguarding incidents or concerns may be reported to the Chief Administrative Officer at safeguarding@pathfinder.org, to the Chair of the Audit Committee at auditcommittee@pathfinder.org, or through any of the channels listed in the "Reporting Misconduct" section.

PROTECTING THE PEOPLE WE SERVE. Pathfinder is entrusted by public and private donors to work with governments and communities to increase access to sexual and reproductive health services and rights. When we act on behalf of others, our actions may be examined closely or held to a higher standard than if we are acting for ourselves. It is important that you clearly represent the perspective of the communities in which we work and respect the rights of program beneficiaries to make their decisions in their own best interest. Do not misuse your trust or authority for personal gain and do not exploit the communities that we serve to the benefit of yourself or Pathfinder. Respect the free will and dignity of our beneficiaries.



Respect

FAMILY PLANNING. Follow the principles of voluntarism, informed choice, informed consent, and method mix in family planning programs. Comply with and ensure subawardee compliance with all donor requirements, including legal restrictions applicable to projects funded by the US government, such as the “Tiahrt” requirements for voluntary family planning projects.

HARASSMENT. Never engage in harassment. This includes any unwelcome behavior, hostility, or negative treatment that creates a hostile or offensive working environment, unreasonably interferes with anyone’s work performance, or otherwise affects their employment opportunities. It includes sexual harassment of any kind, including (but not limited to) unwelcome sexual propositions, requests, innuendo, suggestive comments, jokes, questions, and physical contact. Pathfinder is a global organization with global standards of conduct. You must live up to these standards even in societies with different cultural norms.

DISCRIMINATION. Treat people fairly and equally. Never discriminate. This means you must not treat anyone negatively based on their gender, sex, gender identity, sexual orientation, race, color, ancestry, religion, age, disability, marital status, or any other category specified in Pathfinder policy or applicable law.

Examples of relevant Pathfinder policies:

- Safeguarding Policy Statement
- Prevention of Sexual Exploitation and Abuse Code of Conduct
- Program Operations resources relating to USG compliance with family planning and abortion
- Combating Trafficking in Persons Policy and Compliance Plan
- Anti-Discrimination and Anti-Harassment Policy and Procedure
- Equal Employment Opportunity Policy



Respect

Courage means **confronting difficult challenges.**

It means taking the right path, even if it is not the easy one. It means doing the right thing, even if there are obstacles in the way.

Courage is part of everything we do at Pathfinder. It takes courage to do difficult work in challenging and hard-to-reach places. It takes courage to refuse improper demands, to do things the right way rather than taking shortcuts, to speak up rather than remaining silent.

This last point—speaking up—is so important that this part of the Code focuses only on it. The following example demonstrates what courage means for you and your work at Pathfinder.

REPORTING. You must report any actual or suspected misconduct by Pathfinder, a Pathfinder representative, or a third party doing business with Pathfinder. When you make a report, you are absolutely protected against retaliation. Even with this protection, it can sometimes be difficult to make a report. It takes courage to do so. Pathfinder respects your courage

and relies on it to ensure that we comply with all of the requirements that apply to us and to our work around the world.

Examples of relevant Pathfinder policies:

- Reporting and Whistleblower Protection Policy. For more information, see the section on “Reporting Misconduct.”



Courage

Collaboration means working together to achieve our mission. It means working together constructively and effectively with partners, with those we serve, and with one another.



Here are examples of what collaboration means for you and your work at Pathfinder.

PROCUREMENT. Select partners—such as subawardees, suppliers and consultants—through fair, competitive and transparent processes. Limit procurements to goods and services that are necessary and ensure that the procurements provide the best value to Pathfinder. Avoid perceived or actual conflicts of interest.

ELIGIBILITY SCREENING. Follow the screening process before making employment offers, providing training, accepting funds, or finalizing an agreement. This is necessary to ensure that Pathfinder does not knowingly receive or provide support to anyone who is involved in terrorism or has been excluded, prohibited or sanctioned by the US Government or other relevant donors or entities.

CONFIDENTIALITY. Maintain the confidentiality of all proprietary Pathfinder documents, emails, contacts, activities and other information. If you are unsure whether something can be shared, ask before doing so. You also must maintain the confidentiality of individually-identifiable and other sensitive project information

and data. You also must follow Pathfinder policies on cybersecurity, such as changing your password on a regular basis and never sharing it with anyone else.

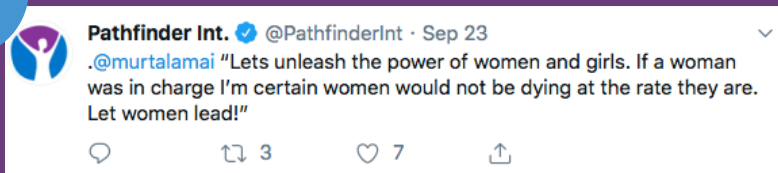
INVESTIGATIONS. Cooperate with investigations by answering questions fully and truthfully and providing access to any Pathfinder premises, facilities, records, and documentary materials relevant to the investigation.

Examples of relevant Pathfinder policies:

- Procurement Policy
- Eligibility Screening Policy and Procedures
- Safeguarding Personally Identifiable Information Policy
- Data Confidentiality Policy and Agreement
- Guidelines for Ethics in Data Collection
- Investigation Policy
- IT Cybersecurity Policy

Collabo ration

Innovation means being open to and developing new approaches. It means adapting to changes at Pathfinder, in the donor environment, in program needs and methods, in the countries where we work, and in society at large. It means finding new, more effective ways of achieving our mission in a changing world. Even when we try out new ideas or use new technologies, we must do so ethically and in compliance with legal requirements.



Here are examples of what innovation means for you and your work at Pathfinder.

PROJECT MANAGEMENT. Use the Project Management Lifecycle tools and resources to identify and manage risks, facilitate training, and ensure successful implementation of donor-funded projects and related activities.

MARKETING AND COMMUNICATIONS. Be fair, truthful, and respectful in your depictions of Pathfinders and beneficiaries. Obtain appropriate verbal or written consent before taking a photograph or video of someone or documenting their story. Consult with colleagues to maintain technical accuracy when creating communications for different audiences.

SOCIAL MEDIA. Social media is a powerful tool to communicate about our work and ourselves. Even when you are using your personal accounts, people may associate you with Pathfinder. When you post about Pathfinder or our work, uphold Pathfinder's values. Be sure to make clear that any posts relating to political campaigns are made in your personal capacity, and not on behalf of Pathfinder. Pathfinder policies still apply when you use social media.

Examples of relevant Pathfinder policies:

- Project Management Lifecycle Resource Center and Program Management Manual
- Social Media Policy
- Lobbying and Political Activity Policy



Innovation

This section summarizes parts of the Reporting and Whistleblower Protection Policy for purposes of convenience. Please refer to the full policy for complete information.

Pathfinder INTERNATIONAL

SPEAK UP!

Help Pathfinder operate with the highest degree of ethics and integrity

Always seek guidance if you have questions or concerns. You must report any actual or suspected misconduct by Pathfinder, a Pathfinder representative, or a third party doing business with Pathfinder.

- Talk to someone } Supervisor, Local Compliance Officer, Project Director, Country Director, Human Resources, or Senior Management
- Email Global Compliance at compliance@pathfinder.org
- Message Global Compliance on WhatsApp at +1-617-972-1316
- Make a **confidential or anonymous** report at pathfinder.org/ethics
- Contact the Board of Directors at auditcommittee@pathfinder.org
- For human trafficking reports, reach the Global Human Trafficking Hotline at +1-844-888-FREE (3733) or help@befree.org

For more information, visit pathfinder.org/ethics

You can make a report to any of the following:



MANAGEMENT

supervisor, or anyone more senior in your line of management, up through your Country Director, Project Director, or Business Unit Director;



SENIOR MANAGEMENT

any Chief Officer (for example, the Chief Legal Officer or the Chief Financial Officer);



COMPLIANCE

Global Compliance (by email to compliance@pathfinder.org) or your Local Compliance Officer;



HUMAN RESOURCES

any member of the Human Resources Business Unit (employment-related issues should be directed to HR whenever possible);



INTERNAL AUDIT

the Internal Audit Director;



BOARD OF DIRECTORS

the Chair of the Audit Committee, by email to auditcommittee@pathfinder.org;



WHATSAPP MESSAGE

to Global Compliance at +1-617-972-1316;



ETHICSPPOINT

the hotline (online or telephone access) is available at www.pathfinder.org/ethics.

Additional reporting options, such as an internal committee for sexual harassment complaints, may be available if required by your country's laws.

All reports will be handled confidentially.

Anonymous Reporting Options

If you prefer to be anonymous, you can make a report without identifying yourself by using the EthicsPoint hotline. The EthicsPoint reporting channel is accessible to anyone, including individuals who are not currently affiliated with Pathfinder.



All Pathfinder employees are required to complete a certification at onboarding and annually that they:



- **have read, understand, and are in compliance** with the Code of Conduct;
- **are in compliance with all laws, policies, donor requirements, and other rules** applicable to their work; and
- have **reported any instances** of actual or suspected misconduct of which they are aware.

If you are uncertain what this certification means, ask for guidance. See the “Ask for Help” section under “Making the Right Decision” above for a list of people and resources who can help answer any questions you may have about the certification.

Your signature on the certification means that you understand and are in compliance.



Pathfinder
INTERNATIONAL
Sexual and reproductive health
without fear or boundary