



Elizabeth Glaser
Pediatric AIDS
Foundation

EGPAF CODE OF CONDUCT

A Culture of Ethical Behavior—it all begins with you!



Dear Foundation Colleagues,

Since our creation in 1988, the Foundation has embraced a culture of honesty and integrity with our employees, Board, donors, business partners, and those we serve. Our high levels of ethical behavior, accountability, excellence, and other core values have been instrumental in building the superb global reputation that we enjoy today.

As EGPAF CEO, I am privileged to represent you in many different situations. EGPAF's commitment to excellence and integrity are never questioned by the donors, government officials, and stakeholders that I meet with frequently. I want to thank you for helping to create this reputation. Our reputation is everything—without it, there is no trust, no respect, and no support from others.

To sustain this excellent record, it is the duty of each of us to make informed, ethical decisions that build trust and reinforce our reputation as an accountable leader. This Code of Conduct provides you with guidance to help you make the right choice when considering any action. If you are ever in doubt, there are many resources available to you. The important thing is that you **Speak Up** if you believe something isn't right – no one will be retaliated against for making a good faith effort to report a situation that they believe isn't right.

It's easy to say how we should act, but the proof is in our actions. So join me in maintaining EGPAF's superb reputation, as we continue our tireless work – until no child has AIDS.

Sincerely,

Chip Lyons | President & CEO

Do you know the Foundation's Values?

Passion

Innovation

Teamwork

Leadership

Accountability

Excellence

If you see or suspect harmful activity, **Speak Up!** Talk to your manager, HR representative, Country Director or a Vice President listed below.

Tami Ward-Dahl	VP, Human Resources & Administration	twarddahl@pedaids.org
Doug Horner	VP, Awards, Compliance & International Operations	dhorner@pedaids.org
Dan Warco	VP, Finance & Accounting	dwarco@pedaids.org

Or if you'd prefer, contact the Ethics Hotline at:

US: 888 225 1429

All other countries: +1 770 776 5674

English: <http://www.reportlineweb.com/PedAids>

All other languages: <https://iwf.tnwgrc.com/PedAids>

**When in Doubt—
Speak Up!**

You **DO NOT** have to
give your name.

The Foundation wants each of our employees to have all the information and resources they need to make informed, ethical decisions. Below are resources we encourage each of you to use should you ever need additional information.

Crossroads – Crossroads houses all of our policies, as well as information on our core values. Access any of these through the [Policies & Procedures page](#) on Crossroads.

Training – the Foundation is committed to reinforcing our message through trainings, orientation and reviews.

KEY POLICIES THAT REFLECT OUR COMMITMENT TO ETHICAL CONDUCT

The Foundation wants to provide you with all the information and resources you need to make informed, ethical decisions. Below are relevant policies to assist you in making those choices. Please ask for help if you are unsure what to do, and [Speak Up](#) if you believe something isn't right.

Fraud & Suspected Fraud Policy

Fraud will not be tolerated and suspected fraud will be vigorously investigated. An employee who commits fraud can expect to be terminated. Fraud poses a risk to the Foundation's assets as well as its global reputation.

What is fraud?

Fraud is an intentional act of deception, misrepresentation, impropriety, or concealment to gain something of value at the detriment of another. Fraud does not necessarily have to result in a loss to the Foundation.

Example:

- An employee submits receipts for reimbursement for a hotel for a higher amount than what they actually paid

What are your responsibilities?

- You have a duty to report ANY activity that you believe to be questionable -- that is, suspected fraud
- If you know about a questionable act, and do not report it, that is a policy violation that may result in disciplinary action against you

Procurement Policy

The Foundation has certain practices to ensure that its contractors are selected in a fair manner. There are only limited exceptions allowed to making awards competitively. No employee is allowed to use their position at the Foundation to personally benefit from or influence contractor selection.

Examples:

- An employee takes a gift from a contractor and helps them win a contract from EGPAF ("kickback")
- To speed up a procurement process, an employee argues for a sole source award to a company who he says is the only one who can do the work, but he knows there are several companies in the area who can do the work

Conflict of Interest Policy

What is a conflict of interest?

A conflict of interest occurs when an employee has a personal or professional relationship, financial interest, or obligation outside the Foundation that could possibly corrupt the motivation for their business decisions. Any potential conflict should be reported to the Foundation for resolution. A potential or actual conflict of interest isn't a bad thing in itself, unless you choose not to disclose it.

Have a potential conflict of interest?

- Fill out the [Disclosure form](#) and submit to the HR department in Washington, DC for review
- If a conflict does exist, you may not be involved in the business relationship in any way

Examples:

- You are on a Procurement Committee that will select the winning contractor for services, and one of your family members works for a company that submitted a proposal to EGPAF
- An employee agrees to have their name and CV included on another organization's proposal for future funding

Accepting Gifts, Entertainment or Incentive Policy

The Foundation is primarily funded by U.S. Government agreements, so as such, we follow their standard for providing/accepting any gift or incentive. In general, no gift may be accepted, even gifts of nominal value. The Foundation's reputation is vital, and does not need to be tarnished by even the appearance of impropriety. There are only a few instances when it is suitable to accept a gift; refer to the full policy for more information.

Examples:

- An employee receives World Cup tickets from the Manager of our bank, and keeps them
- An employee offers to reimburse a potential donor for their travel costs and meals

KEY POLICIES THAT REFLECT OUR COMMITMENT TO ETHICAL CONDUCT

Anti-Bribery Policy

The Foundation opposes bribes and facilitation payments as incompatible with our ethical, accountable and efficient business operations. Furthermore, the Foundation complies with all applicable anti-bribery laws and regulations, including the U.S. Foreign Corrupt Practices Act (FCPA) and similar anti-bribery laws of other countries. An employee must not solicit or receive something of value from a potential or current contractor in exchange for assisting the contractor with winning or retaining business with the Foundation. Furthermore, an employee must not offer to pay, pay, cause to be paid, or authorize a bribe or facilitation payment, including to government officials.

Examples:

- A government official asserts that a compliance problem exists, which based on the facts does not truly exist. Then, the official requests a payment to solve the non-existent problem (a bribe)
- An EGPAF driver pays a police officer cash in exchange for the officer not issuing a traffic citation

Child Safeguarding Principles

The safety of children is of utmost importance to the Foundation. Child abuse, exploitation or neglect are prohibited. In order to best protect children, EGPAF staff will:

- Comply with local child welfare and protection legislation or international standards (whichever has more protection) and with US laws, where applicable
- Report suspected child abuse, exploitation or neglect in our work to senior management for an investigation
- Consider child safeguarding principles when planning and implementing applicable projects. This includes measures such as limiting unsupervised visits with children; no exposure to pornography; complying with laws, regulations, and customs regarding the photographing and filming of children
- Promote child-safe screening procedures for personnel, particularly those whose work brings them into contact with children

Freedom from Harassment Policy

The Foundation is committed to providing our employees with a positive work environment, free of harassment. Any harassment based on race, religion, creed, sexual orientation, age, or any other basis protected by law is prohibited, and should be reported immediately to your supervisor or the HR department, or if you'd prefer, the Ethics Hotline.

Any report of harassment will be investigated and dealt with in an appropriate manner. The Foundation will attempt to resolve the situation with as much confidentiality as possible. It's important that you **Speak Up** if you suspect harassment is occurring in your workplace.

Anti-Prostitution and Trafficking in Persons

The Foundation follows the U.S. Government's opposition to prostitution and related activities, which are "inherently harmful and dehumanizing, and contribute to the phenomenon of trafficking in persons." Trafficking in persons is defined as when a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act is not yet 18 years of age.

EGPAF employees are prohibited from engaging in:

- Trafficking in persons
- Procurement of a commercial sex act
- Use of forced labor
- Acts that directly support or advance trafficking in persons

Whistleblower Policy

The Foundation wants employees to **Speak Up** and "blow the whistle" on suspected fraud and wrongdoing. Therefore, retaliation by a manager against a Foundation employee who comes forward to report possible wrongdoing is prohibited and will not be tolerated. After reporting wrongdoing, if you believe that you have been retaliated against, you must report this immediately to the Global Human Resources Team and your concerns will be promptly investigated.



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*Until no
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ETHICS

IS KNOWING THE

DIFFERENCE

BETWEEN

WHAT YOU HAVE A RIGHT TO DO

&

WHAT IS RIGHT TO DO.

- Potter Stewart -