

# Code of Business Ethics and Conduct



## A note from our President and CEO

I am honored to lead an organization that emphasizes our mission and core values in both who we are and how we operate. We are all stewards of Ipas's reputation and resources. This *Code of Business Ethics and Conduct* is a reflection of our values, serving as a framework to support ethical behavior and decisionmaking. Its principles guide our treatment of one another as well as our interactions with donors, suppliers, partners and other stakeholders.

This code identifies ethical principles that guide our work together, but it is up to each of us to uphold these principles. None of us knows how to respond or react to every situation, so the code provides resources for asking questions, reporting concerns and providing feedback. You are empowered and expected to do the right thing and to ask for help when the right thing is not so clear. Talk to your manager or director, or write to [ethics@ipas.org](mailto:ethics@ipas.org) when questions arise, and report concerns—which can be done anonymously—to the Ethics Hotline at [ipas.ethicspoint.com](http://ipas.ethicspoint.com) or by dialing your country's phone number available on that site.

I urge you to join me in upholding Ipas's Code of Business Ethics and Conduct.

Thank you,

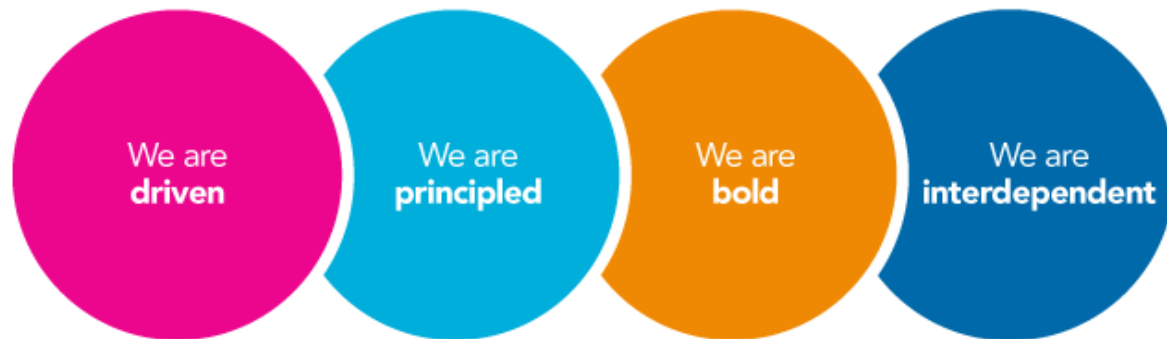


**Anu Kumar**  
***Ipas President and CEO***

## Our mission

Ipas works globally to improve access to safe abortion and contraception so that every woman and girl can determine her own future. Across Africa, Asia and Latin America, we work with partners to make safe abortion and contraception widely available, to connect women with vital information so they can access safe services, and to advocate for safe, legal abortion.

## Our values



## Our 8 ethical principles

### 1. We follow the law everywhere

As employees of a global organization, we are responsible for keeping informed of the laws, regulations and policies that affect our work. It is not unusual for us to encounter confusing, illogical and even conflicting legal requirements where we work. Yet in every circumstance, Ipas's stance is clear: We follow the laws that govern our operations and we take steps to address legal risks that we face in our programmatic work.

The ramifications of ignoring a law—even unintentionally—can be devastating for both Ipas and for the individuals involved. Breaking a law may result in loss of employment, fines or even prison time.

### 2. We embrace diversity and treat everyone with dignity and respect

We believe our differences strengthen Ipas and our impact across the globe, allowing employees to put their varied talents and diverse perspectives to use. Ipas strives to be inclusive and welcoming, and to ensure that employees and stakeholders are always treated with dignity and respect.

Ipas seeks to provide equal opportunity in all aspects of employment and to maintain a work environment free from discrimination, harassment, sexual exploitation and abuse. We uphold these policies worldwide, including in countries that have no legal prohibitions against these behaviors. Ipas follows our policies or local law, whichever goes further to protect marginalized or at-risk populations.

We respect human rights around the world and take immediate action to safeguard vulnerable people from exploitation and abuse. We do not tolerate child or forced labor, nor human trafficking. Our commitment to fair treatment and human rights extends to our suppliers and partners. We insist that our partners treat their stakeholders in a manner consistent with these values.

*Ipas's employee handbook strictly prohibits all forms of discrimination and harassment, including sexual harassment. We hold employees accountable for creating a work environment that is professional and that protects employees, contractors, partners and community members with whom we work from inappropriate behavior. We encourage reporting of concerns and protect parties from retaliation for doing so.*

**Relevant Ipas policies:** Employee Handbook, Safeguarding Policy, Anti-Slavery and Anti-Trafficking Policy.

### 3. Our reporting is clear and understandable, and our records are accurate

Ipas is committed to transparency in our reports to donors and governments. We report clearly and truthfully even when the data does not tell the story we hoped it would.

Ipas uses funds only for purposes that are properly justified and can be independently verified. We maintain financial controls and processes to ensure the accuracy of our financial reporting. We do not tolerate fraud or false or misleading entries or statements in our financial, technical, research and programmatic reports or in any other records, and we do not pressure others to commit fraud. We cooperate fully with our auditors and do not withhold information from them. Our employees strive for complete accuracy and transparency in our documents, reports and verbal statements.

We quickly admit and correct errors, because Ipas and the work we are doing demands and deserves honesty.

*What should I do if I suspect fraud? Report suspicions to [ipas.ethicspoint.com](https://ipas.ethicspoint.com). These will be investigated while maintaining confidentiality.*

**Relevant Ipas policies:** Finance Manual, Employee Handbook, Time Reporting Policy, Anti-Fraud and Restricted Parties' Financing Policy, Donor Allegation Disclosure Policy.

#### 4. We compete honestly and fairly

Our funding environment is competitive. Whether dealing with donors, governments, suppliers or partners our mandate is the same: We compete honestly and fairly. We represent our services and qualifications truthfully. We make purchasing decisions transparently in service of the best value. We create expectations we can meet and make promises we can keep. We compete fairly even when others do not.

We do not compromise our integrity or mislead others to gain an advantage. We never conspire with competitors or engage in other anti-competitive practices. We do not bribe anyone for any reason. We do not seek to influence government officials through payments or by offering anything of value. We do not use others' confidential information to gain an improper advantage. We refuse proprietary information that improperly comes into our possession. We work to hold our third-party Ipas representatives to the same standards as our employees.

**Relevant Ipas policies:** Procurement Policy, Anti-Fraud and Restricted Parties' Financing Policy, Partnership Principles

#### 5. We avoid conflicts of interest

Ipas respects and encourages employees' involvement in community activities unrelated to Ipas's work, when it is on our own time and at our own expense. There are times when a personal interest could conflict with Ipas's best interests but, as employees, we must focus on what is best for Ipas. When there may be the appearance of a conflict between our Ipas duties and outside interests, we promptly disclose and seek resolution.

Employees cannot have improper relationships with suppliers or other third parties and must be vigilant in ensuring that personal or family relationships do not pose a conflict or even the appearance of a conflict of interest.

Employees also cannot accept favors, gifts or other gratuities from suppliers, partners or beneficiaries in exchange for favorable treatment.

*There are times when a personal relationship among employees can cause problems or perceptions of favoritism and unfair treatment, such as when employees begin dating or when a family member works in the same office as another family member. Our Employee Handbook and Conflict of Interest and Disclosure Policy requires that these types of relationships be disclosed.*

**Relevant Ipas policies:** Employee Handbook, Conflict of Interest and Disclosure Policy, Anti-Fraud and Restricted Parties' Financing Policy

## 6. We work toward a safe and healthy environment

Ipas is committed to the health and safety of our employees, our environment and the communities in which we work. We acknowledge and act to mitigate the negative environmental impacts of our work. We follow safety laws and regulations, and do not tolerate threats or workplace violence. We ensure employees have a clean, safe, drug- and smoke-free workplace.

**Relevant Ipas policies:** Employee Handbook

## 7. We protect information and assets

Ipas provides employees with the tools and information to be successful. We treat these valuable assets responsibly and use them only for Ipas business purposes. From the Ipas computers, email, office furniture and vehicles, to sensitive organizational, employee or partner data, we protect these assets. We respect Ipas's and our partners' intellectual property and proprietary information.

We obtain an owner's written permission before disclosing or using proprietary information, patented or copyrighted assets. We use written or visual material only with proper attribution or permission.

We also ensure that Ipas documents are properly maintained and disposed of.

**Relevant Ipas policies:** IT Acceptable Use Policy, Photography and Image Policy

## 8. We create a culture in which all employees take responsibility for ethical behavior

Ipas encourages employees to take ownership for ethical behavior. If an employee is aware of conduct that they believe is unethical or inappropriate, the employee has an obligation to speak up. Ipas protects employees who raise concerns in good faith. Concerns can be raised in various ways:

- Employees can report concerns in writing or over the phone in any language, including anonymously, to Ipas's third party-hosted Ethics Hotline. Visit [ipas.ethicspoint.com](http://ipas.ethicspoint.com) to submit an online report or locate the telephone number for your region.

- Employees can speak to their supervisor or another trusted Ipas manager.

**Q:** *An employee who reports to me has come to me with information about a coworker's conduct that would clearly violate the Code if true. However, the employee has asked me to keep it to myself for now. What should I do?*

**A:** *As an Ipas manager, you must take action to make sure the issue is investigated and addressed. Ipas, through you, is now aware of the conduct and is responsible for addressing it. Submit the concern that has been reported to you to the Ethics Hotline at [ipas.ethicspoint.com](mailto:ipas.ethicspoint.com).*

## The role of all of us as leaders

Ipas employees at all levels share leadership with our executives and directors, and all of us have a special responsibility to model and enforce the behavior of the Code of Business Ethics and Conduct. If you see actions that might violate the Code—even if they do not affect you in any way—you are required to bring them to Ipas's attention and make sure they are addressed.

**Relevant Ipas Policies:** Ethics Hotline Policy, Employee Handbook, Hotline Reporting and Investigations Procedure

## Living the Code

Each of us has a stake in living the Code of Business Ethics and Conduct and enforcing Ipas's ethical principles described here. While these principles are a guide for behavior, deciding what is acceptable conduct in a specific circumstance may not always be easy. In such circumstances, ask for help from a manager, director or [ethics@ipas.org](mailto:ethics@ipas.org).

For the Code to be effective, employees must understand that violations come with consequences up to and including termination of employment. At the same time, employees can be confident that they can report violations of the Code without fear of retaliation and that their concerns will be fully investigated in a timely manner. Allegations that are unfounded or cannot be substantiated nonetheless create opportunities for Ipas to learn and improve. We invite feedback from employees on this Code and Ipas investigations as part of Ipas's commitment to strengthening our culture of ethics and compliance.

## What is required of me?

- Know and understand Ipas policies and standards, donor requirements, and the local laws and regulations that apply to your role.

- Report and encourage reporting of suspected violations, including by Ipas's third-party partners.
- Cooperate fully with internal and external investigations or audits.
- Protect the confidentiality of investigations.
- Complete the Ethics Certification when required.

### **Where can I find the policies referenced here?**

For policies referenced in the Code, visit the Ipas's internal Organizational Policies and Procedures Center or email [ethics@ipas.org](mailto:ethics@ipas.org).