



## AMIDEAST CODE OF CONDUCT

### Purpose

Amideast is committed to conducting business in compliance with all applicable laws, rules, and regulations, and in accordance with the highest standards of business ethics. This Code of Conduct informs Amideast representatives, partners, and affiliates to areas of ethical risk, and provides guidance and information to help them recognize and deal with ethical issues.

This Code describes our approach to conducting business around the world. We are committed to operating worldwide in a manner fully consistent with the highest standards of conduct which includes following best practices pertaining to respect, integrity and ethics, equal opportunity employment, anti-discrimination, and child protection, health and safety, anti-human trafficking, protection from sexual exploitation and abuse (PSEA), anti-corruption, and other areas to promote good governance and positive impact in the communities we serve.

Through this document and subsequent regular training, Amideast endeavors to:

- Follow and abide by the law
- Help Amideast representatives to make ethical decisions
- Communicate policies in a transparent manner
- Effectively conduct business globally

We require that everyone who represents Amideast to strictly observe the laws and regulations of the countries where we work and to comply with these policies as well as terms of our awards and industry best practices.

### Applicability

This Code of Conduct is applicable globally to all Amideast operations, and all representatives of Amideast which includes employees, Board of Directors, consultants, suppliers, sub-recipients, interns, volunteers, and agents. It also applies where the Amideast has a controlling interest and to any project where Amideast has responsibility for the functions and operations. Any deviation from this Code of Conduct requires the approval of the Headquarters Compliance Committee. Laws, regulations, and policies change as our business evolves and as time passes. It is important to obtain the most current information when making decisions.

#### Headquarters

2025 M Street, NW  
Suite 600  
Washington, DC 20036-3363

Telephone: (202) 776-9600  
Fax: (202) 776-7000

E-mail: [inquiries@amideast.org](mailto:inquiries@amideast.org)  
Website: [www.amideast.org](http://www.amideast.org)



Even when Amideast may not have the authority to directly apply these rules to others with which we work, Amideast has the expectation and requirement that all its business partners will abide by these same rules and standards. This Code of Conduct does not constitute a contract and does not provide any rights, contractual or otherwise, to Amideast's employees or any third parties.

## **Accountability**

Amideast representatives are held accountable for their conduct, and we expect all representatives and others with whom we do business to adhere to the spirit and letter of this Code. To ensure compliance, we ask representatives to:

- Review this Code of Conduct and commit to abide by it
- Ensure that questions about this policy are addressed promptly
- Understand how to seek guidance about compliance with the Code of Conduct
- Ensure that non-compliant conduct is reported through any credible means including email, telephone, organization external whistleblower hotline, or meeting with a responsible organization official
- Report any known or suspected unlawful or unethical conduct related to Amideast

As representatives of Amideast, we are responsible for adhering to professional and ethical standards while also complying with Amideast policies and procedures and applicable contractual and legal requirements. The Code of Conduct cannot and does not anticipate every situation that could arise during business; therefore, you must use good judgment in adhering to these standards and avoiding even the appearance of impropriety. Any Amideast employee or representative who violates this Code, permits a subordinate to do so, or fails to promptly inform a supervisor, manager, Human Resources, Country Director/Chief of Party, Vice President, or President/CEO of a known violation will be subject to disciplinary action up to and including termination of employment or contract.

Our actions must consistently demonstrate that we fairly and honestly deal with our colleagues, donors, collaborators, vendors, and beneficiaries. This ethical standard is essential to the implementation of successful development projects, as well as demonstrating to donors that we can be trusted to do the right thing when managing their resources and to beneficiaries that we are worthy partners as they seek to realize their aspirations for better lives.

### **Headquarters**

2025 M Street, NW  
Suite 600  
Washington, DC 20036-3363

Telephone: (202) 776-9600  
Fax: (202) 776-7000

E-mail: [inquiries@amideast.org](mailto:inquiries@amideast.org)  
Website: [www.amideast.org](http://www.amideast.org)



Amideast has established a Compliance Committee comprised of the Headquarters department leads for Finance, Human Resources, Contracts & Grants, Risk Management, and relevant Senior Leadership or Board of Directors. These individuals, as well as all Amideast representatives are accountable for understanding and abiding by this Code, however the Compliance Committee has special accountability for ensuring compliance and overseeing investigations and mitigating measures.

### Reporting and Non-Retaliation

Self-reporting of non-compliance is encouraged. Amideast will investigate any report of a violation of this Policy or any unethical or unlawful conduct as a matter of standard practice.

Amideast employees and affiliates can elevate questions, concerns, or allegations without fear of retaliation. If you see something, say something as soon as possible (within 24 hours).

1. As a first step, contact your supervisor, Manager, or Human Resources with any concern. If you are more comfortable submitting a complaint anonymously, Amideast's Ethics Hotline can also be reached at 1-844-940-0044 (800-603-2869 for all other countries except Iraq, Kuwait, Tunisia, West Bank, Gaza, and Yemen), [conduct@amideast.com](mailto:conduct@amideast.com), or [www.lighthouse-services.com/amideast](http://www.lighthouse-services.com/amideast). All employees, representatives, and affiliates of Amideast, regardless of location, must sign an agreement stating that they will adhere to this Code.
2. As a second step, the supervisor, Manager or Human Resources must contact Country Director/Chief of Party, relevant Vice President, or President/CEO.
3. Any complaint regarding PSEA on a UNICEF-related program, will be reported to the UNICEF PSEA Officer within 24 hours. Incidents, final report, and any updates should be included in the report, and may be anonymous and without identifying information about the individual or survivor.

To preserve the integrity of this Code and to permit everyone we work with to meet their obligations under the Code, it is imperative that all staff can raise concerns or to report issues and misconduct without fear of retribution or retaliation. Amideast encourages the good faith reporting of suspected, planned, or actual violations of any provision of the Code of Ethics and Business Conduct or any applicable law,

#### Headquarters

2025 M Street, NW  
Suite 600  
Washington, DC 20036-3363

Telephone: (202) 776-9600  
Fax: (202) 776-7000

E-mail: [inquiries@amideast.org](mailto:inquiries@amideast.org)  
Website: [www.amideast.org](http://www.amideast.org)

rule, or regulation. The self-reporting of non-compliance or personal questions of compliance is encouraged. Acts of retaliation or retribution against anyone who self-reports will not be tolerated, though they may be subject to disciplinary measures for misconduct. Any representative who intentionally and maliciously provides misleading or false information regarding violations of the Code or against a representative will be subject to disciplinary action, up to and including termination of employment. Amideast is committed to establishing and maintaining an environment in which reports are encouraged, expected, and accepted and employees are free to voice a concern or report a violation without fear of intimidation or retaliation.

Incidents should be reported at the earliest possible time, suggested timeframe is within 24 hours of the incident's occurrence. If reporting within 24 hours is not possible with all details, the initial report should include as much information as possible and then a follow-up report should be submitted as soon as other details are available.

### **Investigations (SEA-specific, but applicable to all matters)**

If a SEA incident is reported and received by whichever means to any relevant Amideast staff or through the above mechanisms, the actions and investigation will follow these steps:

1. Survivor's consent and release will be secured before any confidential information is exchanged. Once the consent has been obtained, information shall be exchanged solely for the purposes of referral, intervention planning, and coordination efforts.
2. Upon receipt of a complaint from a beneficiary (either in-person or via the Amideast SEA Complaint Form in [Arabic](#) or [English](#), or through an intermediary), the Amideast staff person must ensure that any survivor is referred for assistance immediately (usually within 24 to 48 hours) to [conduct@amideast.org](mailto:conduct@amideast.org) following a disclosure.
3. The complaint must be reported to HQ HR and the SLT within the first few hours of receipt from an individual, supervisor or Manager and then HQ will immediately assign an individual or individuals to investigate the allegation in

#### **Headquarters**

2025 M Street, NW  
Suite 600  
Washington, DC 20036-3363

Telephone: (202) 776-9600  
Fax: (202) 776-7000

E-mail: [inquiries@amideast.org](mailto:inquiries@amideast.org)  
Website: [www.amideast.org](http://www.amideast.org)

a timely and thorough manner and may require the assistance of and engagement with external mediation services, legal, or other expert advice. The lead investigator will develop an investigation plan which will include defining the scope, planning interviews, reviewing the reports, document or evidence review, and other activities. During the initial phase, the team will assess local regulations as well as stakeholder and donor/partner/legal requirements for notification of an initial report of allegation.

4. The investigation may require the interview of the person making an allegation, other witnesses, and the alleged perpetrator or suspect. The matter may be referred to the local police or other authorities if it is considered to involve criminal behavior. Amideast will provide updates on the investigation to relevant donor or government agencies on a regular basis, no less than weekly while the investigation is ongoing.
5. All reports will be handled professionally, confidentially, and expediently. In all reports reviewed by people other than the immediate investigator, the names of people involved, and the details will remain confidential. Any disclosure of reports or information will be only on a “need to know” basis or if required by relevant law or protection authorities. The investigation and its outcomes will be appropriately documented throughout the process and shared only with individuals on a strict limited basis and without the survivor’s personal details.
  - All reports made in good faith will be viewed as being made in the best interests of the survivor, regardless of the outcomes of any investigation. Amideast will ensure that the interests of the person reporting abuse, neglect, or exploitation in good faith are protected.
  - Any Amideast representative who intentionally makes false or malicious allegations will face disciplinary action.
6. The rights and welfare of the survivor are of prime importance. Every effort will be made to protect the rights and safety of the survivor throughout any investigation. Pending or during an investigation, the best interests of the survivor may warrant the immediate suspension or removal of a representative as an interim action. Any staff member suspended or removed in this manner will continue to receive full pay or may be asked to use annual leave, recognizing that the staff member is entitled to a fair process and that

#### Headquarters

2025 M Street, NW  
Suite 600  
Washington, DC 20036-3363

Telephone: (202) 776-9600  
Fax: (202) 776-7000

E-mail: [inquiries@amideast.org](mailto:inquiries@amideast.org)  
Website: [www.amideast.org](http://www.amideast.org)

this action is not a pre-judgment of the outcome of any investigation. The individual will have no contact with the survivor or anyone at or representing Amideast, other than the investigator and Human Resources until further notice. Survivors (and parents/caregivers if survivor is a minor) should be informed that there are limits to confidentiality (i.e., related to mandatory reporting and to provision of referrals for support services) and this should be explained in their language in a way that is easy to understand the information and details needed, who will have access, and what follow-up actions may be.

7. Qualified and trained Amideast representatives must ensure the secure use, storage, transfer, and disposal of all data relating to survivors and beneficiaries (including personal data, images, etc.). Any files relating to sexual abuse and exploitation allegations or investigations thereof must be kept in a secure place, and only designated persons will have access to the files. Electronic data must be password protected, and hard copies stored in a locked filing cabinet.
8. Information from the investigation is gathered and reviewed for decision by Headquarters (Senior Leadership and HR) with relevant country and program management. Amideast will take swift action in termination and referral to local or other authorities if the investigation reveals that Sexual Abuse and Exploitation Protection Policy has been violated and/or beneficiaries have been harmed in any way. Amideast will make every effort to complete its investigations within 30 calendar days, although this timeframe may be extended for extenuating circumstances. In the event of a delay, the relevant parties will be notified.

## **Ethics and Conduct**

In general, prior to any action, representatives should use common sense and ask themselves:

- Is it right? Is it legal?
- Could this action appear as inappropriate to others?
- Am I being fair and honest?
- Does it reflect Amideast's values?

### **Headquarters**

2025 M Street, NW  
Suite 600  
Washington, DC 20036-3363

Telephone: (202) 776-9600  
Fax: (202) 776-7000

E-mail: [inquiries@amideast.org](mailto:inquiries@amideast.org)  
Website: [www.amideast.org](http://www.amideast.org)



- Can I explain my logic and reasoning to others? What will other people think of this action?
- Will my decision affect others?
- Would my family and friends be embarrassed if my decision or action becomes public?

If in doubt with respect to questions of general ethics, compliance or conflicts of interest, the guiding principle for all representatives is that there are only two acceptable courses of action: either ask someone with the knowledge and authority to give a definitive answer (e.g., a Manager, Human Resources, Contracts and Compliance or an Ethics and Compliance representative) or, alternatively, just don't do it. The goal is to be certain you are doing the right thing, especially before an action takes place.

### **Duty of Care and Duty of Loyalty**

Amideast Representatives are protected under the principle of Duty of Care where Amideast manages and mitigates as possible, any risks associated with the performance of work. Amideast is responsible for all travel security arrangements and is responsible for the health, safety, and security of individuals and Amideast property. Amideast holds appropriate levels of insurance to protect the interests of Amideast, representatives, and donors as necessary.

Amideast is further committed to a safe working environment that protects the health and wellbeing of representatives. Amideast complies with all work health and safety legislative requirements and, in doing so, focuses on actions to prevent harm and ensure reasonable care of all representatives. Amideast leadership and management must further act in the best interests of the organization and representatives by exercising reasonable care and good faith in the decisions they make for the organization.

Employees have a Duty of Loyalty which involves acting with utmost good faith in the furtherance and advancement of the organization's interests. This includes keeping confidential information protected, operating with care for assigned roles and responsibilities, and using good judgment and sound business principles at all times. Duty of Loyalty also includes taking personal accountability for his/her actions and following instructions and policies that are designed to keep them from harm.

### **Employing Present and Former U.S. Government Employees**

#### **Headquarters**

2025 M Street, NW  
Suite 600  
Washington, DC 20036-3363

Telephone: (202) 776-9600  
Fax: (202) 776-7000

E-mail: [inquiries@amideast.org](mailto:inquiries@amideast.org)  
Website: [www.amideast.org](http://www.amideast.org)



Applicants for employment at Amideast may from time to time include present and former government employees. There are strict limits under federal “revolving door” and conflict of interest rules relating to the hiring of such individuals from across the Government. Applicable rules extend to both pre-employment constraints on contacts with current government employees to discuss their potential employment by Amideast (or their use as consultants or subcontractors) as well as post-employment restrictions on former federal employees when dealing with their previous employing agencies. Before a present or former government employee may be employed at Amideast or contacted regarding employment opportunities, Human Resources must be consulted to ensure that no violations of law occur. Typically, the candidate will be asked to obtain an ethics determination letter from the relevant ethics official within their agency.

## **Procurement**

Amideast believes in fair competition and competes honestly, transparently, and fairly for business opportunities. Amideast always seeks to outperform competition in a fair and honest manner and seeks competitive advantage through superior performance and reputation. Amideast and its representatives will not collude with competitors when bidding for contracts and, if collusion is brought to Amideast’s attention it will be reported without delay. Amideast representatives are required to follow all applicable procurement laws and regulations. In a tender process, representatives will, to the best of their ability, provide accurate and truthful information and will not misrepresent Amideast’s approaches, capabilities, or pricing.

Representatives must never ask for or receive preferential treatment or special privileges or make use of information they are not authorized to have, including non-public documents or other proprietary data. Representatives must not take unfair or improper advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of facts, or any other illegal or unethical trade practice. Representatives will not attempt to influence Public Officials, vendors, or donors with payments, gifts, offers of employment, or participate in unlawful conduct.

## **Anti-Corruption and Bribery**

### **Headquarters**

2025 M Street, NW  
Suite 600  
Washington, DC 20036-3363

Telephone: (202) 776-9600  
Fax: (202) 776-7000

E-mail: [inquiries@amideast.org](mailto:inquiries@amideast.org)  
Website: [www.amideast.org](http://www.amideast.org)





Amideast is committed to honesty, transparency, and fairness and has zero tolerance for bribery, including making facilitation payments or graft. Amideast rejects corruption in all its forms and complies with the spirit and letter of all applicable anti-corruption laws and regulations. Representatives are required to:

- Reject corruption in all forms, including bribery, making facilitation payments, graft, or any prohibited act
- Understand and appreciate that bribery and graft are unlawful and therefore strictly prohibited, regardless of jurisdiction or circumstance
- Adopt and enforce all policies that prevent corruption in the conduct of business
- Ensure that no Public Official benefits financially or in any other unlawful way from the relationship with Amideast (or any Client)
- Operate with an adequate system of internal accounting controls and maintain accurate records that document relevant transactions
- Immediately inform their Manager, Country Director, SLT member, or HQ Human Resources, if information is discovered indicating that a prohibited act has been committed, has been requested or otherwise suggested by any person, including a Public Official or private individual, in connection with, in relationship with, or working for Amideast

Amideast representatives must not:

- Directly or indirectly, commit or attempt to commit, any prohibited act, including bribery, graft, or making a facilitation payment
- Directly or indirectly receive a bribe
- Use their authority for personal gain
- Offer, provide, or receive unlawful gifts, benefits, hospitality, advantages, courtesies, or entertainment from a Public Official where a reasonable person could interpret the offer, provision or receipt as a prohibited act made in connection with the representative's duties, status, or authority

Hospitality is permitted under specific circumstances. Bone fide hospitality or other business expenditure with the aim of presenting Amideast, products or services, or establishing cordial relations is permitted. However, hospitality or promotional expenditure can be misinterpreted as bribery and representatives must keep in mind appearances and perceptions and not offer hospitality where it could be mistaken to have the intention of influencing an official to secure a business advantage, to perform a function improperly or to expedite the performance of a routine government action.

#### Headquarters

2025 M Street, NW  
Suite 600  
Washington, DC 20036-3363

Telephone: (202) 776-9600  
Fax: (202) 776-7000

E-mail: [inquiries@amideast.org](mailto:inquiries@amideast.org)  
Website: [www.amideast.org](http://www.amideast.org)



## **Anti-Discrimination and Equal Opportunity Employment**

Amideast values diversity in all forms and employs people across the world in twelve countries from many different backgrounds, cultures, and life experiences. The organization is committed to an open and discrimination free workplace and promotes understanding, respect, professionalism, and acceptance in all matters and business dealings. Representatives will not engage in discriminatory behaviors based on race, color, gender, language, religion, political or other opinion, national, ethnic or social origin, property, birth, pregnancy, marital status, veteran, disability, sexual orientation, age, genetic information, gender identity, or any other protected status. This policy applies to all professional business dealings for representatives including, but not limited to employment actions of recruitment, selection, job assignment, compensation, promotion, and training.

Further, Amideast is dedicated to promoting gender equity and inclusive workplaces where persons with disabilities and other disadvantaged or vulnerable groups are reasonably accommodated. Representatives must not engage in any discriminatory behaviors including, but not limited to, the following:

- Refusing to hire a qualified candidate on the basis of their status
- Terminating employees on the basis of their status
- Refusing to promote employees on the basis of their status
- Refusing to make reasonable adjustments to a workstation of employees with a disability
- Treating employees unfavorably due to their status

## **Anti-Human Trafficking and Modern Slavery**

Amideast values human dignity, freedom, and fundamental human rights for all people. We share the U.S. government and other donor policies of zero tolerance on Trafficking in Persons for profit or otherwise. All individuals and companies working with Amideast are prohibited from engaging in or supporting any form of human trafficking, defined as the recruitment, transfer, or harbor of any person by means of threat, use of force, or coercion for the purpose of exploitation. Forms of exploitation include, but are not limited to, prostitution or other forms of sexual exploitation, procurement of a commercial sex act, forced labor or services, slavery, or practices like slavery.

## **Child Protection**

### **Headquarters**

2025 M Street, NW  
Suite 600  
Washington, DC 20036-3363

Telephone: (202) 776-9600  
Fax: (202) 776-7000

E-mail: [inquiries@amideast.org](mailto:inquiries@amideast.org)  
Website: [www.amideast.org](http://www.amideast.org)



Amideast is committed to upholding the values and purpose of the UN Convention on the Rights of the Child, which requires that Children will be protected from performing any work that is likely to be hazardous, interfere with a Child's education, or are harmful to a Child's physical, mental, spiritual, moral, or social health. Regardless of the jurisdiction in which Amideast is registered or doing business, these activities are prohibited.

Amideast has a zero-tolerance policy regarding child abuse and it expects the same commitment to child protection from all representatives. Specifically, representatives will:

- Treat children with respect regardless of race, color, gender, language, religion, political or other opinion, national, ethnic, or social origin, property, birth, or other any other protected status
- Whenever possible, ensure that another adult is present when working in the proximity of children
- Use any computers, mobile phones, or video and digital cameras appropriately, and never to exploit or harass children or to access child pornography through any medium
- Refrain from physical punishment or physical discipline of children
- Refrain from hiring children for domestic or other labor
- Comply with all applicable laws, rules, and regulations concerning child protection, including laws in relation to child labor
- Refrain from fraternization with children (including students and program participants)

### **Protection from Sexual Harassment, Abuse, and Exploitation**

All forms of harassment, abuse, and exploitation are in contradiction to Amideast's core ideology. All people have a right to live their lives free from sexual violence. We recognize that our work often puts its representatives in positions of power in relation to the communities we work with, especially with vulnerable adults and children. Representatives have a moral and legal obligation to use their power respectfully and must not abuse the power and influence they possess. Amideast will not tolerate its employees, volunteers, consultants, partners, or any other representatives associated with the delivery of its work conducting any form of sexual harassment or sexual exploitation and abuse (SEA). Representatives have the duty to create and maintain environments that promote the protection of those we serve and our own representatives from harassment or SEA. Amideast embraces a "zero tolerance" policy with respect to sexual misconduct and sexual harassment in

#### **Headquarters**

2025 M Street, NW  
Suite 600  
Washington, DC 20036-3363

Telephone: (202) 776-9600  
Fax: (202) 776-7000

E-mail: [inquiries@amideast.org](mailto:inquiries@amideast.org)  
Website: [www.amideast.org](http://www.amideast.org)



all forms. We will abide by the following six (6) core principles related to protection against SEA:

1. Sexual exploitation and abuse by anyone associated with Amideast (including, but not limited to: employees, volunteers, visitors, interns, vendors, subcontractors, consultants, and partners) constitute acts of gross misconduct and are therefore grounds for termination of employment or contract.
2. Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief in the age of the person is not a defense.
3. Exchange of money, employment, goods, or services for sex, including sexual favors, or other forms of humiliating, degrading, or exploitative behavior is prohibited. This includes exchange of assistance that is due to beneficiaries.
4. Any sexual relationship between those providing assistance and protection and a person benefitting from such assistance and protection that involves improper use of rank or position is prohibited. Such relationships undermine the credibility of integrity of our work.
5. Where Amideast staff, contractors, volunteers, vendors, or partners develops concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether in the same agency or not, s/he must report such concerns via established reporting mechanisms, including, but not limited to our independent online hotline: [www.lighthouse-services.com/amideast](http://www.lighthouse-services.com/amideast); email [conduct@amideast.org](mailto:conduct@amideast.org); or by phone at **1-844-940-0044** (in USA or Iraq, Kuwait, Tunisia, West Bank, Gaza, and Yemen), **+1-800-603-2869** (outside of the US including Egypt, Jordan, Saudi Arabia, and UAE, and except the specific countries listed above).

SEA violations must be reported to [conduct@amideast.org](mailto:conduct@amideast.org) or through our independent hotline [www.lighthouse-services.com/amideast](http://www.lighthouse-services.com/amideast). Violations may also be reported externally to [inspector@unhcr.org](mailto:inspector@unhcr.org) and/or [integrity1@unicef.org](mailto:integrity1@unicef.org) and/or [ig.hotline@usaid.gov](mailto:ig.hotline@usaid.gov).

#### Headquarters

2025 M Street, NW  
Suite 600  
Washington, DC 20036-3363

Telephone: (202) 776-9600  
Fax: (202) 776-7000

E-mail: [inquiries@amideast.org](mailto:inquiries@amideast.org)  
Website: [www.amideast.org](http://www.amideast.org)

6. Amideast personnel, contractors, volunteers, and partners are obliged to create and maintain an environment that prevents sexual exploitation and abuse and promotes the implementation of their code of conduct. Managers at all levels have particular responsibilities to support and develop systems which maintain this environment.

It is the responsibility of all representatives to raise any concerns you have or those which are reported to you according to this Policy. It is not your responsibility to decide whether sexual harassment, abuse, or exploitation has occurred either prior to or after reporting.

SEA violations must be reported to [conduct@amideast.org](mailto:conduct@amideast.org). Violations relating to individuals on programs may also be reported to relevant external agencies including: [inspector@unhcr.org](mailto:inspector@unhcr.org) and/or [integrity1@unicef.org](mailto:integrity1@unicef.org) and/or [ig.hotline@usaid.gov](mailto:ig.hotline@usaid.gov).

All Amideast representatives, especially those who will be interacting with beneficiaries, must supply Amideast with individual certificates of successful completion of the [UNICEF E-Course on PSEA](https://agora.unicef.org/course/info.php?id=7380) available at <https://agora.unicef.org/course/info.php?id=7380> as well as acknowledgment of this Code of Conduct and our SEA policy. Training will be required for all existing and new hires as well as a recertification every two (2) years.

## Conflicts of Interest

Amideast believes in open and transparent business dealings. Representatives must separate their own personal interests from those of Amideast. Conflict of Interest arises when a representative or any member of their immediate family, their spouse/partner, an organization which employs or is about to employ any of the above, or any outside employment in which the representative is engaged, has a financial or other interest in, or will receive a tangible personal benefit, from an action taken by the representative. Actual or potential conflicts of interest must be reported immediately to the representative's Manager and to Human Resources so that action can be taken to manage and mitigate the Conflict of Interest, including but not limited to the exclusion of the representative from any relevant decisions. Dual employment is also an example of a conflict of interest and is not permitted without express permission from the Compliance Committee.

If a representative is subject to codes or rules of conduct other than those contained in this document or other Amideast policies, and a conflict arises between these

### Headquarters

2025 M Street, NW  
Suite 600  
Washington, DC 20036-3363

Telephone: (202) 776-9600  
Fax: (202) 776-7000

E-mail: [inquiries@amideast.org](mailto:inquiries@amideast.org)  
Website: [www.amideast.org](http://www.amideast.org)



codes, it is the representative's responsibility to bring the conflict to the attention of the representative's line manager for resolution.

### **Drug-Free Workplace**

Amideast maintains a drug-free workplace and does not tolerate the manufacture, sale, transportation, distribution, possession or use of any drug or narcotic substance deemed to be illegal in the countries in which Amideast is registered or is performing work. Amideast uses its best efforts to ensure that payments provided to or by Amideast do not provide direct or indirect support or resources to entities and individuals involved in drug trafficking.

### **Fraud, Waste, and Abuse**

Amideast does not tolerate fraudulent activity, waste of Amideast or donor resources or abuse of authority by representatives. Representatives are required to prevent, detect, and report fraud, waste, abuse, or any other prohibited acts that they know or should have known about. The Whistleblower and reporting mechanism is available to report confirmed or suspected violations and representatives are expected to cooperate fully when investigations are undertaken. Fraud is also deliberately falsifying or withholding information for personal or financial gain. Examples of fraud include any of the following:

- Fraudulent financial reporting
- Misappropriation or misuse of Amideast or donor property or funds
- Inflated performance numbers or metrics
- False certifications or information on qualification or documentation
- Using corporate funds for personal use
- Falsified documents, invoices, vouchers, or receipts
- Phony bids or multiple bids on a solicitation from a single vendor
- Substitution of lower quality goods or services at a higher premium price

### **Insider Trading**

Amideast is committed to transparency and Compliance with all securities laws and regulations. In this section, "purchase" includes the actual purchase of a Security, as well as the entry into any contract to purchase or otherwise acquire a Security and "sale" includes the actual sale of a Security, as well as the entry into any contract to sell or otherwise dispose of a Security. Amideast does not tolerate Insider Trading or any violation of securities laws or regulations. Representatives must not:

#### **Headquarters**

2025 M Street, NW  
Suite 600  
Washington, DC 20036-3363

Telephone: (202) 776-9600  
Fax: (202) 776-7000

E-mail: [inquiries@amideast.org](mailto:inquiries@amideast.org)  
Website: [www.amideast.org](http://www.amideast.org)



- Purchase or sell any type of Security while aware of material, non-public information relating to the Security
- Directly or indirectly pass on or “tip” material non-public information to anyone outside Amideast under any circumstances or to anyone within Amideast who does not have a need-to-know such information
- Knowingly trade in the Securities of any company or entity with which Amideast is known to be engaging in a confidential transaction

### **Intellectual Property**

All Intellectual Property developed in the course of employment, whether permanent, temporary, or fixed term, either paid or unpaid, with Amideast remains the property of Amideast or, where contractually specified, the property of Amideast and/or the donors as relevant.

Representatives are required to comply with all applicable laws, rules, and regulations, Amideast policies and procedures, and contractual policies and procedures of donors covering Intellectual Property rights.

### **Political Activity**

Amideast is committed to and supports representative's rights to engage in civil society in their personal capacity and non-working time. Representatives are free to engage in political activity in their country of citizenship so long as their involvement is not in conflict with their official duties, not during work hours, outside of Amideast property, and does not use Amideast resources. Representatives who engage in political activity are prohibited from representing Amideast endorses or in any way is associated with their political activity of other political activities of any type. Representatives should ensure that participation in political activities does not reflect unfavorably on the organization. Amideast encourages representatives to participate in the civic process and stay informed on local, state, national, international affairs and to exercise the right to vote when possible.

### **Protection of Information and Resources**

In the performance of their duties, representatives may be granted access to many sources of information, confidential or otherwise. Any information provided as part of a representative's duties or any information to which the representative has access must be used only for official purposes. Representatives will not make any

#### **Headquarters**

2025 M Street, NW  
Suite 600  
Washington, DC 20036-3363

Telephone: (202) 776-9600  
Fax: (202) 776-7000

E-mail: [inquiries@amideast.org](mailto:inquiries@amideast.org)  
Website: [www.amideast.org](http://www.amideast.org)



unauthorized, improper, or unlawful use of any information made available to them in the performance of their duties. Further, representatives will not access information without an official purpose related to the performance of their duties.

In addition to information, Amideast resources must also be protected. Representatives are expected to:

- Use or manage both human and material resources efficiently and effectively
- Avoid waste, misuse, and abuse of Amideast resources and will conserve and safeguard Amideast assets
- Ensure that all facilities, physical resources, and other property belonging to or leased by Amideast are given due care and maintenance
- Budget honestly
- Respect the natural environment by engaging in environmentally friendly work practices

### **Respectful Workplace – Anti-Bullying and Anti-Harassment**

Amideast was founded on the idea of promoting mutual understanding between people. We work and collaborate with people of different races, nationalities, religious beliefs, ages, genders, and cultures. We are deeply committed to treating each other with understanding, dignity, and respect. We are committed to providing equal opportunity in all aspects of employment and to maintaining a work environment free from discrimination, bullying, harassment, and sexual exploitation or abuse. We uphold these policies worldwide, including in countries that have no specific legal prohibitions against bullying, harassment (sexual or other forms of abuse), or discrimination. We each have a responsibility to create and maintain an open and positive work environment where we respect our differences and value and acknowledge everyone's contributions.

We are committed to providing all staff and representatives an atmosphere conducive to the professional performance of duties, without fear of harassment or predation, by whatever means or with whatever intended effect.

Amideast defines bullying as repeated, health-harming mistreatment of one or more people by one or more perpetrators. It is abusive conduct that includes:

- Threatening, humiliating, or intimidating behaviors
- Work interference/sabotage that prevents work from getting done

#### **Headquarters**

2025 M Street, NW  
Suite 600  
Washington, DC 20036-3363

Telephone: (202) 776-9600  
Fax: (202) 776-7000

E-mail: [inquiries@amideast.org](mailto:inquiries@amideast.org)  
Website: [www.amideast.org](http://www.amideast.org)

- Verbal abuse

We consider the following types of behaviors examples of bullying:

- Verbal bullying or abuse - slandering, ridiculing or maligning a person or his or her family; persistent name-calling that is hurtful, insulting or humiliating; using a person as the focus of jokes; abusive, and offensive remarks
- Physical bullying - pushing, shoving, kicking, poking, tripping, assault or threat of physical assault, damage to a person's work area or property
- Gesture bullying - nonverbal gestures that can convey threatening messages.
- Exclusion - socially or physically excluding or disregarding a person in work-related activities

## **Anti-Terrorism**

Amideast does not tolerate or condone the engagement, directly or indirectly, in terrorism or in the financing of or support to terrorists. Further, Amideast uses its best efforts to ensure that payments provided to or by Amideast do not provide direct or indirect support or resources to entities and individuals involved in terrorism. Transactions with, and the provision of resources and support to, individuals and organizations associated with terrorism are prohibited.

Amideast abides by the sanctions put in place by the international community including, but not limited to the United Nations, the European Union, the United States Office of Foreign Asset Control, the United Kingdom Foreign and Commonwealth Office, and the Australian Department of Foreign Affairs and Trade.

Amideast abides by sanctions related, but not limited to:

- Counter Narcotics Trafficking
- Counter Terrorism
- Non-Proliferation
- Rough Diamond Trade Controls
- Transnational Criminal Organizations

Updated sanctions lists can be found here:

- <http://www.treasury.gov/resource-center/sanctions/Programs/Pages/Programs.aspx>
- <https://www.gov.uk/sanctions-embargoes-and-restrictions>

### **Headquarters**

2025 M Street, NW  
Suite 600  
Washington, DC 20036-3363

Telephone: (202) 776-9600  
Fax: (202) 776-7000

E-mail: [inquiries@amideast.org](mailto:inquiries@amideast.org)  
Website: [www.amideast.org](http://www.amideast.org)

- <http://hmt-sanctions.s3.amazonaws.com/sanctionsconlist.htm>
- <http://www.un.org/sc/committees/consolidated.htm>
- <http://dfat.gov.au/international-relations/security/sanctions/Pages/consolidated-list.aspx>

## Non-Compliance

Non-compliance with any policy listed in this Code, at any level is treated with the utmost seriousness by Amideast. The disciplinary actions are detailed in the relevant Employee Handbook and include investigation into gross misconduct and breach of policies.

Amideast appreciates that cases of sexual abuse or exploitation can be exceptionally difficult to discover and/or prove. Survivors of sexual abuse and exploitation often face enormous social and cultural barriers to reporting any abuse or exploitation. In many cases alleged perpetrators may wield power or position over their victims, and/or live in close proximity to them. Amideast recognizes that these factors may interfere with any investigation into cases of sexual abuse or exploitation.

Sexual exploitation and/or abuse of program participants, beneficiaries, or others constitute acts of serious misconduct and are grounds for disciplinary action, including termination of employment and referral to law enforcement, as well as termination of subrecipient grants, if applicable. All offices must comply with local laws on SEA violations. A staff member who is proven to have committed sexual exploitation and/or abuse will be dismissed from their employment and ineligible for rehire. If an allegation is made in bad faith, appropriate steps will be taken to follow up with the person who has made the allegation and the person accused.

Any representative who makes false and malicious accusations will face disciplinary action, up to and including termination.

Should there be any areas of concern, Amideast representatives should contact their line manager, human resources staff, or other Manager.

### Headquarters

2025 M Street, NW  
Suite 600  
Washington, DC 20036-3363

Telephone: (202) 776-9600  
Fax: (202) 776-7000

E-mail: [inquiries@amideast.org](mailto:inquiries@amideast.org)  
Website: [www.amideast.org](http://www.amideast.org)



## Code of Conduct Acknowledgement and Acceptance

I have read, understood, and will comply with the obligations set forth in the Amideast Code of Conduct as acknowledged by my signature below:

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Name (Print)

### Headquarters

2025 M Street, NW  
Suite 600  
Washington, DC 20036-3363

Telephone: (202) 776-9600  
Fax: (202) 776-7000

E-mail: [inquiries@amideast.org](mailto:inquiries@amideast.org)  
Website: [www.amideast.org](http://www.amideast.org)

USA | Egypt | Iraq | Jordan | Kuwait | Lebanon | Morocco | Saudi Arabia | Tunisia | United Arab Emirates | West Bank / Gaza | Yemen