

**SAVE THE CHILDREN FEDERATION, INC.**  
**CODE OF ETHICS AND BUSINESS CONDUCT**

Save the Children is committed to preserving a working environment that promotes integrity in its business practices. All representatives of Save the Children – employees, volunteers, interns, consultants, Board members and others – must conduct the Agency’s activities honestly, with integrity and good judgment, and in the best interest of the Agency and the children, families and communities we serve. Save the Children representatives must demonstrate conduct that upholds the Agency’s reputation, is respectful of the rights of others, and complies with all applicable laws, regulations and standards.

The following are specific requirements for Save the Children representatives in conformity with these precepts. The list is not exhaustive.

**Compliance with Law, Regulations and Standards**

Save the Children representatives must act in conformity with the laws and regulations of the United States and the countries in which the Agency works. They must abide by Save the Children’s own policies and procedures and act in conformity with professional standards common to representatives of other charitable organizations, non-profit corporations and non-governmental organizations.

**Financial Transactions / Records and Reports**

- All financial transactions must be accounted for accurately and properly. No undisclosed or unrecorded funds or assets may be established or maintained for any purpose.
- Payments/cash transactions must be made only into Headquarters-approved bank accounts.
- No borrowings may be made from local lending institutions or individuals without prior written approval of the Vice President for Finance and Administration.
- Financial data required to be submitted to donors, including governments, must be accurate, complete, current and in accordance with contractual/grant requirements.
- Other than travel advances, personal loans or personal advances may not be made to staff or consultants under any circumstances without the prior written approval of the Vice President for Finance and Administration. Travel advances are to be accounted for and documented within 30 days of execution. Requests for compensation advances where staff business travel prohibits the normal receipt of such funds require two levels of written supervisory approval.

## **Gifts and Gratuities**

- No political contributions may be made from Save the Children funds in the United States or in any other country, even in locations where such contributions are legal.
- No payments may be made to any government official, candidate for a political office, any political party or official thereof, or to any other person or entity where the person making the payment knows or has reason to believe that the recipient will pass some or all of the payment to a prohibited person for the purpose of obtaining or retaining business. Notwithstanding the foregoing, expediting fees, processing fees and payments to brokers or middlemen, paid in the usual course of business which are not illegal and are in line with prevailing rates and practices for similar transactions in the locale, are allowed to secure goods and services for Save the Children.
- Gratuities, business entertainment, meals and gifts which are lawful, customary and reasonable in amount are permissible using Save the Children funds. However, no payments, gratuities or gifts will be made, directly or indirectly, to any official or employee of the United States government or any other government or government agency that exceed \$49.99 (or equivalent in local currency).
- No employee or member of his or her family may solicit or accept, directly or indirectly, any gift, entertainment or favor from an actual or potential supplier of Save the Children except for promotional-type gifts with a retail value under \$50 (or equivalent in local currency), and entertainment, meals and social invitations that are in keeping with good business ethics that obligate neither the recipient nor Save the Children. This includes the payment of commercial transportation, hotel room or other living and traveling expenses, except when travel and participation is part of a group hosted by a supplier or customer representative, the activity is business-related, and the activity is promptly reported to the employee's supervisor and next level supervisor.

## **Conflicts of Interest**

A conflict of interest is any circumstance that would cast doubt on an employee's ability to act with total objectivity with regard to Save the Children's interest. Save the Children seeks to avoid the appearance of, as well as any actual, conflict of interest. Employees in doubt about a potential conflict should speak with the appropriate member of his/her supervisory chain. The following are examples of conflicts of interest:

- No employee or family member may have, directly or indirectly, a significant financial interest in, involvement with, or obligation to any business organization which does or seeks to do business with Save the Children unless the interest or obligation has been fully disclosed in writing to the employee's supervisor and next level supervisor, and it has been determined that the employee's duties for Save the

Children will not require him or her to make decisions or take actions that could be influenced by such interest, involvement or obligation.

- No employee may engage in an independent business venture or perform work or services for another organization to the extent that the activity prevents the employee from devoting the time and effort to the business of Save the Children as required by his or her position.
- No employee may appropriate or divert a business opportunity of Save the Children to any other person or organization.
- No employee may participate in a decision-making process involving circumstances that present a conflict of interest. This includes employment-related decisions regarding a family member or other person with whom the employee has a close personal relationship.

### **Beneficiary Safety and Protection**

- Sexual exploitation and abuse by employees constitute acts of gross misconduct and are therefore grounds for termination of employment.
- Sexual activity with children (persons under the age of 18) is prohibited regardless of the local age of majority or age of consent. Mistaken belief in the age of a child is not a defense. The sole exception in applying this principle may be in the instance where an employee is legally married to someone under the age of eighteen.
- 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.
- Sexual relationships between employees and beneficiaries are strongly discouraged since they are based on inherently unequal power dynamics. Such relationships undermine the credibility and integrity of humanitarian aid work.
- Where an employee develops concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether employed by Save the Children or not, s/he must report such concerns via established Save the Children reporting mechanisms.
- Employees are obliged to create and maintain an environment that prevents sexual exploitation and abuse and promotes the implementation of this Code of Conduct. Managers at all levels have particular responsibilities to support and develop systems that maintain this environment.

### **Confidential and Proprietary Information**

Save the Children possesses information that has been created, discovered and developed by the Agency, or has been disclosed to the Agency under the obligation of confidentiality. Such information (“Confidential and Proprietary Information”) includes donor lists, information concerning beneficiaries and programming, financial statements, projections, marketing or programmatic plans or strategies, software and computer programs, art work and photography. Save the Children employees having access to Confidential and Proprietary Information are required, during and after employment with the Agency, to keep all such Confidential and Proprietary Information in strictest confidence. Nothing contained in this paragraph is intended to prevent any employee from utilizing his or her general knowledge, intellect, experience and skills for gainful employment after termination of employment with the Agency.

### **Reporting a Possible Violation**

Any person who is aware of a possible violation of this policy has the right and responsibility and is strongly encouraged to report such violation so that Save the Children can respond rapidly and take appropriate action. Any such violation should be reported using Save the Children’s procedures for Resolving Employee Grievances and Reporting Policy Violations contained in this Handbook and available on SaveNet.