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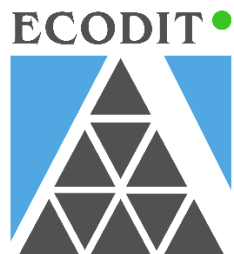
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**Responsible Division:**

Administration

# ECODIT Code of Business Ethics and Conduct

*Note: In adopting and publishing these guidelines and disseminating them to ECODIT staff, we note that (1) in some respects our policies may exceed minimum legal requirements or industry practice, and (2) nothing contained in this Code should be construed as a binding definition or interpretation of a legal requirement or industry practice. As an ECODIT employee, please note that this Code is not an employment contract and does not modify the employment relationship between ECODIT and you. ECODIT reserves the right to amend, alter and terminate policies at any time.*



## Table of Contents

<i>STATEMENT of POLICY</i> .....	4
<i>PURPOSE</i> .....	4
<i>SCOPE</i> .....	5
<i>TRAINING/GUIDANCE</i> .....	5
<i>CONSEQUENCES of VIOLATING THE CODE</i> .....	5
<i>HOW TO REPORT A VIOLATION of THE CODE</i> .....	5
<i>CONSEQUENCES of NOT REPORTING A VIOLATION of THE CODE</i> .....	6
<i>ANTI-RETALIATION (Whistleblower Protection)</i> .....	6
<i>COOPERATION WITH INVESTIGATIONS</i> .....	7
<i>FRAUD</i> .....	7
<i>BRIBERY AND KICKBACKS</i> .....	8
<i>GIFTS, MEALS, ENTERTAINMENT, AND HOSPITALITY</i> .....	9
<i>CONFLICTS of INTEREST (“COI”)</i> .....	10
<i>SAFEGUARDING CORPORATE ASSETS</i> .....	11
<i>FAIR DEALING</i> .....	12
<i>PROCUREMENT INTEGRITY</i> .....	13
<i>ACCURATE REPORTING of TIME WORKED AND OTHER COSTS</i> .....	13
<i>POLITICAL ACTIVITY</i> .....	13
<i>CHILD PROTECTION/SAFEGUARDING</i> .....	14
<i>SEXUAL EXPLOITATION AND ABUSE</i> .....	16
<i>TRAFFICKING IN PERSONS</i> .....	16
Employee Acknowledgement .....	17
Affiliate Acknowledgement .....	18



*Dear ECODIT Employee:*

ECODIT has a reputation for honesty and integrity in business dealings and lawful and ethical behavior. This reputation is a source of pride for us as well as one of our greatest assets, because it instills the necessary trust and confidence in us by our clients, subawardees, suppliers, partners, peers, and the international development community to which we belong. Here at ECODIT, we are committed to the highest standards of business ethics.

In order to maintain our commitment to integrity, and in compliance with FAR 52.203-13, ECODIT has established a Code of Business Ethics and Conduct (the Code) and a Corporate Compliance Program (the Program) for administering it. The Code is intended to identify the rules that our employees are expected follow when conducting business at ECODIT, and the Program is intended to ensure that all employees are abiding by the Code. ECODIT will provide regular training to employees on fraud prevention and detection and employees are encouraged to review available guidance on these issues.

As an employee, you are expected to read the Code upon employment, and certify your commitment to complying fully with it. To administer the Code, I have appointed **Nathalie McNulty** as the Designated Ethics and Compliance Officer (DECO). Among other things, Nathalie will be responsible for implementing appropriate procedures and policies, ensuring that all employees receive a copy of the Code, providing regular training on compliance with the Code, and ensuring effective and appropriate enforcement of the Code. The DECO reports directly to me and has my full support and attention. She will work with other officers and managers to administer the Code and I expect everyone to fully support her in her duties. Also, even though I have appointed Ms. McNulty as the DECO, please know that I maintain an open-door policy for any employee who has concerns about ECODIT or employee practices.

I cannot stress enough that ECODIT does not, and will not, tolerate any form of unlawful or unethical behavior by any person or entity associated with it. Corrective measures will be promptly executed. At the very least, ECODIT requires that each of its employees conducts himself or herself in accordance with the laws and regulations that apply to our business. You are expected to alert the DECO to any information you may have of any unlawful or unethical behavior by any of our employees, clients, subcontractors, consultants, grantees, or suppliers. Violation of this Code, including failure to report a violation or other unlawful or unethical behavior, can be grounds for discipline (up to and including termination), depending upon the severity of the violation, and in accordance with all applicable laws.

Our continued success depends on all of us doing the right thing at all times and maintaining the highest ethical standards. Only in this way, can we continue to earn the trust, confidence and respect of our clients and partners and fulfill ECODIT's mission.

Sincerely,

//s//

Joseph  
Karam  
President

# Code of Business Ethics and Conduct

## *STATEMENT of POLICY*

All of ECODIT's employees, as well as agents who act on behalf of ECODIT, including subawardees and consultants, must share in ECODIT's commitment to the highest ethical standards and the law. All ECODIT employees must read and follow this **Code of Business Ethics and Conduct**. Adherence to this Code and to our other official policies is essential to maintaining and furthering our reputation for ethical practices among all those we work with.

Situations that involve ethics, values and violations of certain laws are often very complex. No single code of conduct can cover every business situation that you will encounter. Some situations will be unique and may be initiated by a contact outside of ECODIT; it is impossible to cover the entire range of those situations within this Code. The foundation of our ethics program is: ***when in doubt, ask***. If you do not understand part of this Code, are confused as to what actions you should take in a given situation, or wish to report a suspected or actual violation of law, regulation, contract, or this Code, you should follow the procedures discussed in section XV entitled "Corporate Compliance Program."

ECODIT requires that employees and affiliates who represent its interests observe all applicable US laws and regulations as well as those of the countries in which they are working or traveling while on ECODIT business.

Beyond following the law, one of the fundamental principles of professional business conduct at ECODIT is to treat others with respect. Respectful, professional conduct furthers the company's mission, promotes productivity, minimizes disputes, and enhances the company's reputation. All employees and affiliates are expected to demonstrate cultural understanding, sensitivity, and respect in their conduct of ECODIT business.

## *DEFINITIONS*

Code of Business Ethics and Conduct (the Code): The written statement of acceptable behavior by ECODIT's employees that ensures that ECODIT operates according to the highest ethical standards.

Designated Ethical Compliance Officer (the DECO): The ECODIT official designated by the President to be responsible for implementing and administering the Code of Business Ethics and Conduct.

Corporate Compliance Program (the Program): The written policies used by ECODIT that are designed so that all officers and employees are aware of the Code of Business Ethics and Conduct and adhere to its standards. The Corporate Compliance Program is implemented and administered by the DECO.

## *PURPOSE*

The purpose of this document is to inform ECODIT employees and affiliates of ECODIT's commitment to the highest standards of Business Ethics and Conduct and what is expected of them.

## *SCOPE*

These Standards apply to all ECODIT employees and affiliates.

**ECODIT employees** include headquarters and project employees and interns whether based inside and outside of the United States; regardless of nationality or citizenship; and it includes full-time, part-time, and temporary employees.

**ECODIT affiliates** include volunteers, consultants, and all independent contractors conducting business or activities on behalf of ECODIT. All ECODIT affiliates are required to read the Code and sign a statement of acknowledgement.

ECODIT receives its funding primarily from the US Government and US companies. By accepting such funding, we must follow applicable client rules and regulations. As the US Government is the major source of funding for ECODIT, the Code is written principally to address the regulations and laws pertaining to the US Government and its agencies. However, the Code and its requirements apply to all ECODIT employees and affiliates, regardless of the source of funding or award on which the employee or affiliate may work.

## *TRAINING/GUIDANCE*

ECODIT is committed to providing training and/or guidance on ethics and good business practices for all employees and affiliates. ECODIT shall provide periodic training on Business Ethics and Conduct and other related topics to both HQ and project office staff. The DECO is also available to provide guidance on an on-going basis.

## *CONSEQUENCES of VIOLATING THE CODE*

Anyone who is found to have violated the Code will be subject to prompt disciplinary action up to and including immediate termination of employment or applicable affiliate agreement. If suspended, such suspension may be with or without pay. Depending on the nature of the violation, ECODIT may be required to report the violation to the Inspector General, appropriate police jurisdiction, and/or other oversight agency as required by law. Regardless, ECODIT may take legal action, or other actions as deemed appropriate by ECODIT.

## *HOW TO REPORT A VIOLATION of THE CODE*

ECODIT provides employees and affiliates with multiple avenues for reporting actual or suspected violations:

ECODIT's Compliance Reporting Hotline. Real or suspected violations may be reported online or by telephone and may be reported anonymously at:

1-833-290-0001 (for calls within the US only)

Or: [www.lighthouse-services.com/ecodit](http://www.lighthouse-services.com/ecodit)

Issues related to Human Trafficking may also be reported via the Global Human Trafficking Hotline:  
1-844-888-FREE (3733)  
[help@befree.org](mailto:help@befree.org)

Real or suspected violations may also be reported to the DECO, directly or by phone or email

Nathalie McNulty

(703) 841-1883 Ext. 112  
[nmcnulty@ecodit.com](mailto:nmcnulty@ecodit.com)

The DECO, or her designee, will promptly and thoroughly investigate all reports and complaints. Investigations will be kept confidential to the extent permitted by law and by the company's need to properly investigate the situation.

### *CONSEQUENCES of NOT REPORTING A VIOLATION of THE CODE*

Employees and affiliates play an important role in upholding the Code. If an ECODIT employee or affiliate suspects a violation, even if the evidence is unclear, please report it. Often circumstances are complicated and there may be steps or options that can be taken to mitigate a violation or potential violation.

An employee or affiliate who discovers any potentially unlawful or unethical activity related to ECODIT projects, business practices, or activities is obligated to report it as required by the Federal Acquisition Regulations (FAR) Clause 52.203-13 entitled "Contractor Code of Business Ethics and Conduct" and may do so without fear of retaliation or liability (unless said person or affiliate is the perpetrator of said violation).

Anyone who is found to have knowingly failed to report a violation of the Code will be subject to prompt disciplinary action up to and including immediate termination of employment or applicable affiliate agreement. If suspended, such suspension may be with or without pay.

### *ANTI-RETALIATION (Whistleblower Protection)*

ECODIT will not retaliate against a whistleblower. This includes, but is not limited to, protection from retaliation in the form of an adverse action such as termination, decreased compensation, poor work assignments, and threats of physical harm. Any whistleblower who believes he/she is being retaliated against must contact ECODIT immediately. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

Insofar as possible, the confidentiality of the whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law, and to provide accused individuals their legal rights of defense. Individuals protected include the following:

- The employee or affiliate who reports to an ECODIT employee or is about to report to ECODIT a matter of concern.

- The employee or affiliate who reports or is about to report to a public body or government entity, a matter of public concern.
- The employee or affiliate who participates in a court action, an investigation, a hearing, or an inquiry held by a public body on a matter of public concern.

ECODIT will not tolerate retaliation against any employee who in good faith reports actual or suspected violations of the Standards. If you believe you or others are the subject of retaliation for reporting actual or suspected violations or participating in an investigation, you must report the matter to the Reporting Hotline and/or the DECO.

## *COOPERATION WITH INVESTIGATIONS*

You must cooperate completely in any investigation relating to ECODIT and must be always be truthful. You may not interfere with or obstruct an investigation conducted by the company or any government agency. In addition, you may not disclose or discuss an investigation without prior approval of the DECO.

## *FRAUD*

Fraud is the false representation of a matter of fact, whether by words, conduct, false allegations, misleading allegations, or concealment of information that should have been disclosed. This is done to deceive an individual or company so that the individual or company will act to its detriment.

Fraud can occur when an employee or affiliate acts for personal benefit to the detriment of ECODIT or its clients. It can also occur if an ECODIT employee or affiliate acts for personal benefit to the detriment of another individual or organization, but where it does not directly injure ECODIT.

Examples of fraud may include but are not limited to:

- Misappropriation or inappropriate use of funds, supplies, or other assets;
- Forgery or alteration of a check, bank draft, or any other financial document;
- Forgery or alteration of any other document or record belonging to ECODIT;
- Impropriety in the handling or reporting of money or financial transactions;
- Profiting because of insider knowledge of organizational activities;

Fraud is not tolerated under any circumstances and must be reported immediately, even if it is only suspected. Employees and affiliates should not take it upon themselves to investigate an allegation or suspected case of fraud. ECODIT employees and affiliates who report suspected or alleged fraud in good faith will not suffer retaliation, even if fraud was not found or proven upon investigation.

### ***Ensuring the Accuracy of ECODIT's Statements, Submissions, Certifications, and Representations***

ECODIT may be asked to furnish certifications and representations to its government agencies, or to other clients, who in turn may supply ECODIT's information to the government. Examples include proposal information, cost or pricing data and estimates, invoices, program reports, etc. The government or client often relies on these certifications to award contracts, agreements, and modifications, and to make payments. ECODIT employees and agents must ensure that any such certifications or representations submitted by ECODIT are truthful and accurate to the best of their knowledge.

## ***Plagiarism***

Plagiarism is the passing off of another's work as one's own. It can take several forms, including incorporating text from another work without quoting it, paraphrasing text from another work without giving proper attribution to the author of that work, and using someone else's ideas without proper attribution. Plagiarism is not addressed by the copyright laws, and is usually considered a form of academic dishonestly or unethical conduct.

It is the policy of ECODIT not to plagiarize the works of others, and not to tolerate plagiarism – it will be treated as a violation of the Code. It is the ECODIT policy to provide full credit to the authors of referenced works. All ECODIT employees and affiliates must ensure that any necessary approvals have been obtained in order to use any works (including photos) and that proper acknowledgement/attribution of sources is made.

## ***BRIBERY AND KICKBACKS***

Employees and affiliates are prohibited from participating in bribery or kickbacks in any form. A bribe occurs when someone gives, offers, or promises anything of value to another person/entity, with the intent to influence that person/entity with regard to a decision or action they can take. A kickback is any money, fee, credit, gift, gratuity, thing of value, or compensation of any kind that is provided, directly or indirectly, for the purpose of improperly obtaining or rewarding favorable treatment in connection with the receipt of awarding of contracts or grants of any kind, purchase orders, or other resources.

If you are involved in transactions with foreign government officials, you must comply not only with the laws of the country of these officials but also with the U.S. *Foreign Corrupt Practices Act (FCPA)*. This Act makes it illegal to pay, or promise to pay, money or anything of value to any non-U.S. government official for the purpose of directly or indirectly obtaining or retaining business. The FCPA also applies to payments made to third parties, such as consultants, knowing that corrupt payments would be made to a government official for the purposes of obtaining or keeping business. This ban on illegal payments and bribes applies to ECODIT agents, consultants or subawardees that use funds for purposes prohibited by the Act.

Local officials or contractors may approach ECODIT representatives with offers to help ECODIT in exchange for some action or service, stated or implied. Such approaches must be politely but firmly rebuffed, and, if they persist, reported to the DECO. An employee or affiliate who is solicited for money, favors, or anything of value by or on behalf of a government official to influence or reward an official decision must report the incident to DECO immediately.

In some countries, it is permissible to pay government employees for performing certain required duties. These facilitating payments, as they are known, are small sums paid to facilitate or expedite routine, ***non-discretionary*** government actions, such as obtaining phone service or an ordinary license. In contrast, a bribe, which is never permissible, is giving or offering to give anything of value to a government official to influence a ***discretionary*** decision. Understanding the difference between a bribe and a facilitating payment is very important. The firm prohibits the payment of any bribe and will allow a routine facilitating payment ***only where it is necessary and legal***.



ECODIT employees and affiliates are further prohibited from encouraging or permitting an actual or potential subcontractor, agent, or representative to make a payment or provide gifts as described above. Any employee or affiliate found to have engaged in such prohibited actions will be subject to termination of employment or affiliate agreement/contract, and may be subject to criminal prosecution.

Employees and affiliates may not solicit or accept gifts, meals, entertainment, personal discounts, travel and transportation, lodging, goods, cash, services, or other favors from current or potential business partners, suppliers, subcontractors, vendors, or other business acquaintances.

### *GIFTS, MEALS, ENTERTAINMENT, AND HOSPITALITY*

Gift giving to US government personnel is governed by complex laws and regulations concerning acceptance of entertainment, meals, gifts, gratuities and other things of value from firms and persons that these government agencies do business with or upon which they exercise regulatory authority. With few exceptions, US Government agencies have strict prohibitions against their employees accepting any such business courtesies.

Therefore, except as otherwise permitted by law or regulation, we are prohibited from offering or providing any business courtesy, including meals, entertainment, travel, lodging expenses, or other thing of value to any US Federal Government employee or representative – unless the provision of such is specifically authorized by the terms of an award/contract issued by the client to ECODIT. Modest refreshments offered or received on an occasional basis in conjunction with business activities – are acceptable.

If you deal with representatives of a particular Federal agency, you are responsible for complying with that agency's standards of conduct. Where there is a question as to an agency's requirements under its standards of conduct, you must contact the DECO in advance for guidance.

We may provide meals, refreshments, or entertainment of reasonable value to non-government persons in support of business activities, provided the business courtesy is not offered as a "quid pro quo", (offered for something in return for the courtesy), or the courtesy does not violate any law, regulation, or the standards of conduct of the recipient's organization. It is our responsibility to inquire about prohibitions or limitations of the recipient's organization before offering any business courtesy. The courtesy must be consistent with marketplace practices, infrequent in nature, and not lavish or extravagant. It cannot cause embarrassment or reflect negatively on our reputation if it were to become known.

Employees of national and local governments are subject to a wide variety of different laws and regulations. We must consult our location's policies as well as applicable laws and regulations prior to offering anything to such local or host government employees. If you have questions, consult the DECO.

In instances where customs in certain countries require the exchange of gifts, the company will, to the extent permitted, provide the gift. Gifts and entertainment, when such have been approved by the appropriate ECODIT President or his designee are **not allowable** costs either as direct or indirect expenses. Any gifts, other than those of nominal value, received from representatives of foreign governments or agencies will become company property and must be reported to the DECO.

You should never solicit or accept a gift or favor from those with whom we do business. A gift is unacceptable if it would not have been offered or given had the employee not held their position with

ECODIT. Gifts include any cash, gratuity, favor, discount, entertainment, hospitality, or any other item having monetary value. It includes service, as well as transportation, travel, lodging or meals.

You may accept novelty or promotional items or modest gifts related to commonly recognized occasions, such as a promotion, holiday, wedding or retirement, if:

- this happens only occasionally;
- the gift was not solicited; and
- disclosure of the gift would not embarrass you or ECODIT

You may accept an occasional invitation to an activity, entertainment or meal if:

- there is a valid program or mission purpose involved;
- this happens only occasionally;
- the activity is of reasonable value and not lavish;
- the activity, if made public, would not embarrass you or ECODIT, or tarnish our reputation; and
- a representative of the giver's firm is present at the event.

### *CONFLICTS of INTEREST ("COI")*

We all must perform our duties and exercise judgment on behalf of ECODIT without influence or impairment, or the appearance of influence or impairment, due to any activity, interest or relationship that arises outside of work. ECODIT's employees must avoid conflicts of interest whether they are actual or perceived. *Put simply, when our loyalty to ECODIT is affected by actual or potential benefit or influence from an outside source, a conflict of interest exists.*

Conflicts of interest can also arise from personal or business relationships with individuals who may have or could provide information that may not be available to a competitor, commonly referred to as "inside information." Any situation that can influence or impair an ECODIT employee's or affiliate's judgment or decision-making is a conflict of interest.

Below are a few examples of situations where a conflict of interest may arise:

- Employing a family member or participating in the selection process of a family member.
- Awarding or participating in the procurement process of a business that is wholly or partially owned by the ECODIT employee or affiliate or by a family member of an ECODIT employee or affiliate.
- Working at a second job, volunteering at another organization, owning/managing your own business, serving on the board of directors of another organization
- Accepting gifts from vendors, sub-contractors or other organizations that provide, or potentially could provide, ECODIT with goods and services.
- Using your ECODIT work position or information accessed due to your relationship with ECODIT for direct or indirect personal gain.
- Diverting business opportunities to other companies.

### ***Outside employment or owning/managing your own business***

Outside employment is permissible if it does not interfere, compete, or conflict with the Company's interests, and provided it does not hinder the employee's ability to meet the responsibilities and demands of Company required work.

A fulltime ECODIT employee who is seeking additional employment elsewhere or owns/manages his/her own business must document this relationship and have a memo placed in their employment file to document that ECODIT is aware of the relationship, the DECO and the Director, Human Resources (HR) have vetted it and has determined that given the information provided by the employee and the employee's current performance, no conflict of interest exists.

### ***Volunteer / Board of Directors***

ECODIT encourages you to volunteer and ECODIT does not object to serving on a Board of Directors of another entity so long as it does not present a conflict of interest and does not conflict with your work responsibilities as determined by the DECO and HR.

### ***Diverting Business Opportunities to Other Companies***

ECODIT employees cannot be involved in diverting business opportunities to other companies. "Diverting business opportunities" is a phrase used to describe helping a competitor of ECODIT or other parties (or even oneself) gain business opportunities (e.g. RFPs, RFQs, competitive grants, etc.) at the expense of ECODIT. As an employee of ECODIT, it is expected that your professional loyalty lies first and foremost with ECODIT, and that your actions serve to support ECODIT's future growth, health and competitiveness.

If in doubt, please check with the DECO. If a conflict cannot be avoided, it must be managed in an ethical, responsible manner and so as not to create the perception of impropriety.

## ***SAFEGUARDING CORPORATE ASSETS***

All employees have a responsibility to protect ECODIT's assets and the assets of our clients, both physical and intellectual, from loss, theft, misuse, and waste. ECODIT's and clients' assets and funds may be used only for ECODIT's mission purposes and may never be used for illegal purposes.

### ***Theft, Waste and Abuse***

ECODIT's physical assets and funds are entrusted to you in order to efficiently complete our programs and mission. These must be actively protected from loss, theft, misuse, and waste. Incidental personal use of telephones, fax machines, copy machines, personal computers, e-mail and similar equipment is generally allowed if it is occasional, there is no significant added cost to ECODIT, it does not interfere with your work responsibilities, and it is not related to an illegal activity or outside business dealings.

### ***Confidentiality***

It is important that you protect the confidentiality of ECODIT's information. Confidential or proprietary information includes all information that is not generally known to the public and is helpful to the firm. Confidential or proprietary information should be marked accordingly, kept secure and access to it limited to those who have a need to know in order to do their jobs. This information may be specific to ECODIT, ECODIT's staff, its donors, peer partners or clients.

Confidential information includes, but is not limited to:

- salary information;
- employee's personal demographic information (home addresses and phone numbers);
- employee's health or disability status;
- personnel files;
- payroll files;
- accounting or financial data;
- contractual agreements;
- applicant data;
- proposal submissions and proposal budgets;
- ECODIT's intellectual property;
- disciplinary or grievance procedure findings;
- non-public information about donors, peer partners, or clients; and
- any ECODIT data/information that has not been released to the public.

Access to confidential information may not convey a personal benefit or advantage but it imposes an obligation to keep such information confidential and to use it solely in the interests of the firm. This obligation also extends beyond the employment period.

### ***Protection of Intellectual Property***

Pursuant to law and ECODIT policy, and without an express agreement specifying otherwise, any work (whether technical work or creative work) prepared by ECODIT personnel within the scope of their employment is work for hire and is owned by ECODIT.

Protection of ECODIT's intellectual property, including its patents, copyrights, trademarks, know-how, and the experience and knowledge developed in the course of ECODIT's activities is essential to maintaining ECODIT's competitive advantage. You are expected to establish, protect, maintain and defend ECODIT's rights in all significant intellectual property and to use those rights in a responsible way. In addition to protecting ECODIT's intellectual property rights, you must respect the valid intellectual property rights of others. Unauthorized use of the intellectual property rights of others may expose the firm to civil lawsuits and damages. Theft and misappropriation of intellectual property may result in significant fines and criminal penalties for ECODIT and/or you.

### ***FAIR DEALING***

ECODIT prides itself on a reputation as a trustworthy and ethical member of our community of international development businesses. We are committed to maintaining the highest levels of integrity and fairness within our firm. When we fail to negotiate, perform or communicate in good faith, we may damage our reputation and lose the confidence of our beneficiaries, clients, or partners. You must conduct business honestly and fairly and not take unfair advantage of anyone through any misrepresentation of material facts; manipulation, concealment or abuse of privileged information; fraud; or other unfair business practice.

## *PROCUREMENT INTEGRITY*

US Government procurement integrity regulations are designed to ensure that contractors receive no unfair advantage when competing for US Government contracts. With respect to all government contracts, subcontracts, and related transactions, ECODIT employees and affiliates must strictly avoid any conduct that may violate the integrity of the Federal Procurement process. ECODIT requires that its employees and affiliates strictly avoid any conduct that may violate the integrity of the Federal Procurement process. ECODIT, its employees, and its affiliates may not, directly or indirectly:

- Offer, give, or promise to any government official any money, gratuity, gift, bribe, kickback, or other thing of value.
- Solicit or obtain, prior to contract award, any proprietary or source selection information from any government official.
- Disclose proprietary or source selection information to any person outside of ECODIT other than an individual authorized by the Contracting Officer to receive such information.
- Engage in employment discussions with a procurement official, or make an offer or promise of future employment, or a future business opportunity, to a procurement official.
- Make inaccurate representations with respect to Company size, status, affiliation, or cost or pricing information.

The laws and regulations concerning hiring present and former US Government employees are complex. Among other things, the rules: (1) prohibit contractors from making offers to or discussing post government employment or business opportunities with government procurement officials participating in a solicitation on which a company is bidding or offering; (2) prohibit government officials from participating in a government matter involving any firm with whom the official is negotiating or has an arrangement concerning future employment; and (3) prohibit certain post-government employment activities, including representation of a contractor before the US Government on a matter in which the employee participated personally and substantially while a government employee.

## *ACCURATE REPORTING of TIME WORKED AND OTHER COSTS*

The accurate charging of labor, travel, material, and other costs is essential to maintaining the integrity of customer billings, financial reporting, and planning. Deliberate mischarging of work time is timecard fraud and violates both ECODIT policy and the law. Knowingly charging an unauthorized account or cost objective, or knowingly approving such mischarging, or shifting of costs to an improper account, is prohibited. Each employee is responsible for ensuring that labor, travel, material, and other expenses are recorded truthfully and accurately. These costs include, but are not limited to, normal contract work, leave, and bid and proposal activities.

## *POLITICAL ACTIVITY*

It is against ECODIT policy for employees to lobby other employees on behalf of a political candidate during the workday. It is also against our policy to reimburse an employee for any political contributions or expenditures. Outside normal office hours, you are free to participate in political campaigns on behalf of candidates or issues of your choosing, as well as make personal political contributions in accordance with applicable laws and regulations on individual political contributions, as long as you do not give the impression that you are representing ECODIT.

## *NON-DISCRIMINATION*

ECODIT is committed to providing equal employment opportunities for all our employees and will not tolerate any speech or conduct that is intended to, or has the effect of, discriminating against any applicant or employee because of his or her race, color, citizenship status, ethnicity, religion, national origin, age, sex (including pregnancy), marital status, sexual orientation, genetic disposition, protected physical or mental disability, veteran status, or any characteristic protected by law. We will not tolerate discrimination by anyone – managers, supervisors, co-workers, temporary workers, consultants, business partners, vendors or sub-awardees. This policy extends to every phase of the employment process, including: selection/hiring, job assignment, transfer, promotion, demotion, layoff, discipline including termination, compensation and benefits, as applicable.

The Human Resources department has been assigned specific responsibility for implementing and monitoring our anti-discrimination programs. One of the tenants of this Code, however, is that all employees are accountable for promoting non-discriminatory practices within our firm. If you observe conduct that you believe is discriminatory, or if you feel you have been the victim of discrimination, you should notify your supervisor or the DECO.

## *CHILD PROTECTION/SAFEGUARDING*

ECODIT supports the goals of the UN Convention on the Rights of the Child ([www.unicef.org](http://www.unicef.org)), host country and local child welfare and protection legislation or international standards, whichever gives greater protection to children from abuse, exploitation, and violence.

ECODIT is committed to protecting children (defined as those who have not attained 18 years of age) from abuse, exploitation, and neglect:

- Child abuse, exploitation, or neglect constitutes any form of physical abuse; emotional ill-treatment; sexual abuse; neglect or insufficient supervision; trafficking; or commercial, transactional, labor, or other exploitation resulting in actual or potential harm to the child's health, well-being, survival, development, or dignity. It includes, but is not limited to: any act or failure to act which results in death, serious physical or emotional harm to a child, or an act or failure to act which presents an imminent risk of serious harm to a child.
- Physical abuse constitutes acts or failures to act resulting in injury (not necessarily visible), unnecessary or unjustified pain or suffering without causing injury, harm or risk of harm to a child's health or welfare, or death. Such acts may include, but are not limited to: punching, beating, kicking, biting, shaking, throwing, stabbing, choking, or hitting (regardless of object used), or burning. These acts are considered abuse regardless of whether they were intended to hurt the child.
- Sexual Abuse constitutes fondling a child's genitals, penetration, incest, rape, sodomy, indecent exposure, and exploitation through prostitution or the production of pornographic materials.
- Emotional abuse or ill treatment constitutes injury to the psychological capacity or emotional stability of the child caused by acts, threats of acts, or coercive tactics. Emotional abuse may include, but is not limited to: humiliation, control, isolation, withholding of information, or any other deliberate activity that makes the child feel diminished or embarrassed.

- Exploitation constitutes the abuse of a child where some form of remuneration is involved or whereby the perpetrators benefit in some manner. Exploitation represents a form of coercion and violence that is detrimental to the child's physical or mental health, development, education, or well-being.
- Neglect constitutes failure to provide for a child's basic needs within any ECODIT activities that are responsible for the care of a child in the absence of the child's parent or guardian.

ECODIT employees and affiliates shall not undertake abusive, exploitative and neglectful behaviors towards children and shall avoid situations that constitute poor practice and which could contribute towards abusive, exploitative or neglectful behavior. ECODIT holds employees and affiliates to the highest of standards - ***even if a given behavior or act is not illegal in the host country***. The examples and behaviors below are not exhaustive.

**Unacceptable behaviors:** ECODIT employees and affiliates shall never:

- physically assault children;
- physically abuse children;
- develop sexual relationships with children;
- develop inappropriate relationships with children;
- act in ways that could put a child at risk of abuse or exploitation;
- use language, make suggestions or offer advice which is inappropriate, offensive or abusive;
- behave in a manner which is inappropriate or sexually provocative;
- condone, or participate in, behavior of children which is illegal, unsafe or abusive;
- shame, humiliate, belittle or degrade children, or otherwise perpetrate any form of emotional abuse;
- show differential treatment, or favor particular children to the exclusion of others;
- discriminate against a child;
- view, make or distribute child pornography.

**Care of environment:** ECODIT employees and affiliates will take special care when working with or around children:

- ensure that a culture of openness exists so that staff, affiliates and others are not afraid to raise concerns;
- ensure that children understand their rights and what is/not acceptable behavior of adults or other children and know who to contact if they have any concerns;
- plan and organize work to minimize risks;
- be aware of and manage situations which may present risks;
- when working with or around children: no adult should ever be alone with a minor and out of sight of others. Exercise the "two adults" rule, ensuring that two adults are present always, or at a minimum ensure an adult's interaction with a child is within full view of others;
- acquire permission of child/parent/caregiver before any image of a child is used for publicity, fundraising or awareness campaigns;
- Ensure that parents or legal guardians are informed and give their authenticated written consent for the collection of information;
- Information that identifies the location of a child and therefore could put them at risk will not be put in communications.

ECODIT does not allow the recruitment and/or hiring of children in order to carry out ECODIT activities.

## *SEXUAL EXPLOITATION AND ABUSE*

Sexual exploitation and sexual abuse constitute acts of serious misconduct and are grounds for disciplinary measures, including dismissal.

- 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 a child is not a defense.
- Exchange of money, employment, goods or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior, is prohibited by ECODIT employees and affiliates.
- Sexual relationships between ECODIT employees and affiliates and the individuals with whom ECODIT works, since they are based on inherently unequal power dynamics, undermine the credibility and integrity of the work of ECODIT and are strongly discouraged.
- ECODIT employees and affiliates are obliged to create and maintain an environment that prevents sexual exploitation and sexual abuse. Managers at all levels have a responsibility to support and maintain this environment.

## *TRAFFICKING IN PERSONS*

ECODIT is committed to protecting vulnerable populations from trafficking.

Trafficking in persons includes the recruitment, transportation, transfer, harboring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.

Exploitation includes, but is not limited to, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labor or services, slavery or practices similar to slavery, servitude or the removal of organs.

Specifically, ECODIT employees and affiliates may not traffic in persons, procure commercial sex acts, use forced labor in the performance of ECODIT activities or engage in acts that directly support or advance trafficking in persons. This includes, but is not limited to, the following acts:

- destroying, concealing, confiscating, or otherwise denying an employee access to that employee's identity or immigration documents;
- failing to provide return transportation or pay for return transportation costs to an employee from a country outside the United States to the country from which the employee was recruited upon the end of employment if requested by the employee, unless: a) exempted from the requirement to provide or pay for such return transportation by the terms of an award/contract; or b) the employee is a victim of human trafficking seeking victim services or legal redress in the country of employment or a witness in a human trafficking enforcement action;
- soliciting a person for the purpose of employment, or offering employment, by means of materially false or fraudulent pretenses, representations, or promises regarding that employment;
- charging employees recruitment fees;
- providing or arranging housing that fails to meet the host country housing and safety standards.



## ECODIT Code of Business Ethics and Conduct

### Employee Acknowledgement

I hereby certify that I have read ECODIT's Code of Business Ethics and Conduct. I understand and agree to abide by them. I also understand that the DECO and the Reporting Hotline are available to in order to report real or suspected violations of the Code. I realize that any violations of the Code may lead to disciplinary action.

\_\_\_\_\_  
Name (*Please Print*)

\_\_\_\_\_  
Location

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

# ECODIT Code of Business Ethics and Conduct

## Affiliate Acknowledgement

I hereby certify that I have read ECODIT's Code of Business Ethics and Conduct, which can be found at:

<http://www.ecodit.com/WorkingWithEcodit/?catId=3653&name=ETHICS%20AND%20INTEGRITY>

I understand and agree to abide by the standards. I also understand that the Designated Ethics and Compliance Officer (DECO) and the Reporting Hotline are available to me to report real or suspected violations of the Code.

Real or suspected violations may be reported online or by telephone and may be reported anonymously at:

1-833-290-0001 (for calls within the US only)

Or: [www.lighthouse-services.com/ecodit](http://www.lighthouse-services.com/ecodit)

Issues related to Human Trafficking may also be reported via the Global Human Trafficking Hotline:

1-844-888-FREE (3733)

[help@befree.org](mailto:help@befree.org)

Real or suspected violations may also be reported to the DECO, directly or by phone or email

Nathalie McNulty

(703) 841-1883 Ext. 112

[nmcnulty@ecodit.com](mailto:nmcnulty@ecodit.com)

I realize that any violations of the standards may lead to termination of my relationship or contract with ECODIT.

\_\_\_\_\_  
Name (*Please Print*)

\_\_\_\_\_  
Location

\_\_\_\_\_  
Title and Company (*If Applicable*)

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date