



THE PROMISE FOUNDATION

For mental health, education and potential realisation

CODE OF ETHICS

INTRODUCTION

1. PURPOSE OF THE CODE OF ETHICS

Why a Code of Ethics?

The Code of Ethics (the Code) was developed to consolidate the ethical expectations of all of Promise Foundation (the Foundation) staff and other personnel. The Code governs how we behave with each other, with our partners, donors and the public. It summarizes the policies that upholds our ethical principles and protects the Foundation's reputation.

This Code underscores our values of operating with integrity at all times. It aims to help you make ethical decisions in the context of your work and in your personal interactions outside of work.

2. WHOM DOES THIS CODE APPLY TO?

Every Promise Foundation staff member (regardless of rank or level), consultant, service contractor, volunteer and intern is expected to comply with this Code.

Staff members together with all others working for the Foundation are collectively referred to in this Code as "staff" or "you" or "we" or "our".

While this Code describes ethical behaviour we expect from you, it does not replace or supersede our various policies which provide greater detail on specific subjects. All of our policies are published on the Foundations website [policies and governance page](#).

It is expected that all staff not only abide by the specific policies and rules in place but also abide by **the spirit and intent of this Code**.

3. WHY DOES ETHICS MATTER?

As the Foundation is judged by the behaviour of its representatives (employees, leaders, volunteers, trustees), each of us is bound to act ethically at all times. The long-term success of the Foundation depends on maintaining the respect and confidence of our donors, our partners, the public and the Governments we deal with. We partner with organizations on a global scale and must comply with not only our own Code of Ethics but must ensure that our own ethical standards meet the standards expected of our partners.

4. THE PROMISE FOUNDATION'S FUNDAMENTAL VALUES

The Foundation has adopted five values that govern our behaviour, in order to create a unified culture to support [Our Vision](#) to apply the behavioural sciences to promote the educational, social and economic development of the individual.

Integrity

We are trustworthy and reliable

We practice open and honest communication

We strive to outperform and take responsibility for our actions

Transparency

We have open communication channels

We ensure staff have the information they need to excel at their job

Policies are available to all employees

Mutual Respect

We have clear rules of conduct and lead by example

We strive to provide meaningful work for our employees and partners

We listen and show respect for different opinions

Professionalism

We remain calm under pressure

We behave consistently in a way that protects our own personal brand and the Foundation's reputation and brand.

We respect the cultural differences of the communities we serve when interacting with them.

Accountability

We set clear and realistic expectations

We clearly define our organizations goals

We provide regular feedback and opportunities for improvement.

Our values align with the [Charter of the United Nations, Chapter XV, Article 101, Para 3](#) which states that the paramount consideration in the employment of UN partner's "shall be the necessity of securing the highest standards of efficiency, competence, and integrity."

WHAT DO WE MEAN BY ETHICAL CONDUCT?

1. ACT WITH INDEPENDENCE AND IMPARTIALITY

You must be independent, fair and objective in conducting your duties.

In working for the Foundation you must seek to protect the best interests of the Foundation, rather than those of individual governments or other personal or political interests.

2. ACT WITH HONESTY AND PROFESSIONALISM

Role model the behaviours you want to see in others.

You must uphold and promote the highest standards of ethical and professional conduct, and carry out your duties with honesty, integrity and professionalism.

3. OBEY THE LAW

Regardless of where you carry out Foundation's work, you must obey local laws and honour your legal obligations. For example, you must obey local traffic laws, pay your debts and avoid activities that are illegal.

4. AVOID CONFLICTS OF INTEREST

Avoid placing yourself in situations where your objectivity can be questioned, or where your personal bias makes it difficult for you to maintain impartiality.

A conflict of interest is a situation in which your personal interests clash, or appear to clash, with the interests of the Foundation.

An example of a conflict of interest is engaging a vendor who is a family member even if the staff member has the best intention to ensure that quality service is provided to the Foundation. In this situation, the staff member cannot protect and be loyal only to the Foundation when their personal interests in the vendor may cloud their judgment, and allow others to suspect that the staff member may not be objective and impartial.

While working for the Foundation, you must base your actions and decisions on the Foundation's priorities, rather than your personal interests, the interests of family or friends, or those of a Government. It is critical to avoid conflicts of interest, or even the appearance of a conflict, between your personal interests and your professional responsibilities.

If you are in a situation that appears to create a conflict of interest, or raises questions of possible partiality or bias, review the situation with your manager or the Director.

As we aim to align our training to the organizations with whom we partner, all staff should complete the Core Module on Conflicts of Interest Course offered by UNICEF on their training site [Agora](#).

OUR POSITION ON FAMILY AND PERSONAL RELATIONSHIPS

The Foundation supports the recruitment of family members, however, to ensure impartiality, all applicants for a position at the Foundation must disclose whether they are related to any

Foundation staff member or contractor. Staff members cannot participate in the hiring process of a family member, and family members cannot work in the same team or line of authority.

Appointment of family members must be signed off by the Director.

OUR POSITION ON GIFTS, AWARDS AND PAYMENTS

At the Foundation we follow a strict policy of not accepting or giving gifts that would compromise the Foundations Code of Ethics. This includes, honours, awards, hospitality, travel, favours or payments that are tantamount to accepting favours, bribes or unwarranted incentives.

Receiving favours and gifts in connection with your work are sensitive ethical issues at the Foundation. This is because it can create an obligation to the person who has given the gift that can damage the Foundation's reputation by calling into question your independence.

*You similarly may not accept any gift, award, or hospitality etc. from a vendor or anyone having or seeking to have a contractual relationship with the Foundation. **There is no exception to this rule when it comes to vendors.*** Any such gifts should be returned with a polite note explaining the Foundation's gift policy.

OUR POSITION ON OUTSIDE EMPLOYMENT, EXTERNAL ACTIVITIES AND BOARD POSITIONS

While working for the Foundation, you cannot undertake any outside work or activities that may interfere with your ability to perform your role at the Foundation. This includes activities that take up your time and energy, or are perceived as incompatible with your status as a Foundation staff member, contractor or volunteer.

The Foundation however, generally supports and approves of activities that contribute to your professional development as well as those activities that further the Foundation's objectives.

To ensure a conflict of interest situation does not arise, prior approval from the Director must be sought before engaging in any outside activities whether paid or unpaid, excluding studies, private unpaid social or charitable work, activities conducted outside working hours. It is however, advisable to discuss these with your supervisors in the event you have concerns.

You must obtain approval for the following:

- To own a business
- To participate on a board, panel or committee or public speaking events
- To take on outside employment
- To take on study whose coursework in greater than 10 hours per week
- To publish articles, blogs or posts on social media in your official capacity or where your opinions could damage the reputation of the Foundation by association. For example, expressing contrary political / religious / racist views on a private blog.

As a rule of thumb, when in doubt, speak to your supervisor first.

OUR POSITION ON POLITICAL ACTIVITY

The Foundation supports your right to vote and encourages you to do so. You are permitted to belong to a political party provided that your membership does not entail action, or an obligation to take action that is inconsistent with, or would adversely reflect upon your position in the Foundation.

We also support your right to your religious beliefs and practices.

However, as we are often partners with Governments and other global organizations, staff, contractors and volunteers are not allowed to:

- Publicly criticize Governments
- Take part in political demonstrations
- Wear politically-themed clothing or badges
- Run or hold political office
- Belong to groups that advocate violence
- Belong to racist parties
- Participate in hate speech of any kind

YOU MUST DECLARE AND DISCLOSE FINANCIAL INTERESTS DERIVED FROM THE FOUNDATION

You may not have any financial interests that may profit, or appear to benefit, from your Foundation work.

The Foundation's annual [Declaration of Interests](#) for senior staff helps maintain and enhance public trust in the integrity of the Foundation by identifying, managing and mitigating the risk of personal conflicts of interest. Designated staff at Director and above including members of the Board of Trustees are required to sign the declaration annually.

The Foundation requires *all* job candidates, regardless of level, and *all* new vendors, to complete a separate [Pre-Onboarding Conflicts of Interest Disclosure Form](#). The form provides for the disclosure of relationship so that controls can be put in place before new staff commence employment, and new vendors are onboarded in order to prevent potential conflicts of interest from developing into actual conflicts.

PROTECTING THE FOUNDATION'S ASSETS AND RESOURCES

While working at the Foundation you have access to numerous assets and resources that belong to the Foundation (e.g. computer systems, supplies, vehicles, cash). You are responsible for the appropriate use and protection of these assets, which means you are expected to use the Foundation assets and resources wisely and for the benefit of the Foundation in carrying out your duties. You are expected to treat these assets and resources with care and to prevent waste and misuse.

Our assets include not only money and physical items, but also intangibles such as time, information and technology.

MONEY

The Foundation funds are received from donors for specific objectives and purposes. You must not misuse the Foundation's funds (nor permit misuse) by spending monies on matters unrelated to the work of the Foundation, or by engaging in wasteful or inefficient expenditure.

For example, buying products or services from a vendor generally must go through a competitive process so as to obtain the best value for the Foundation. Similarly, when you submit a claim for any personal benefits or work-related expenses the claim or expense must be truthful, reasonable, and supported by appropriate documentation.

PHYSICAL ASSETS

The property and assets of the Foundation are intended only for official purposes. You are responsible for the professional use and reasonable care of the items assigned to you for your work such as computers, mobile phones, office equipment and vehicles. You should NOT use office supplies or other Foundation materials for personal purposes – even if the item seems small.

VEHICLES

The Foundation's vehicles are only to be used for Foundation official business purposes and cannot be used for trips unrelated to Foundation work unless specifically permission is granted by the Director and full costs are recovered including fuel, insurance and vehicle wear and tear. Similarly, you cannot request that a colleague or subordinate use a Foundation vehicle for your personal benefit. Remember to always use seatbelts, and obey local traffic rules, including speed limits and parking restrictions. Please refer to our [Company Vehicle Policy](#) for details.

TIME – YOURS AND OF OTHERS

Our people are our greatest asset. You are expected to manage your time efficiently, and apply yourself to your duties with maximum productivity and competence. If you are a manager, do not ask, require or permit subordinates or co-workers to spend working hours on non-Foundation tasks; also as a manager, do not abuse your authority, or your colleagues' good will, by asking that they perform personal tasks for you.

As you are expected to dedicate your full time and attention to your tasks and responsibilities at the Foundation, you must not let any outside activities (even where the activity has been approved) to affect your ability to perform your job.

OFFICE TECHNOLOGY

The Foundation's office technology (including mobile phones, computers, e-mail, Internet, and other technologies) are intended for official business purposes. The Foundation has the right to monitor and review ALL information contained in these systems, including emails (See [Internet Usage Policy](#)). As such, please be aware that there is no right of privacy when using the Foundation's systems and equipment.

You are permitted to use the Foundation's technology, such as e-mail, phones and printers, for limited personal purposes, with prior permission.

Any improper use (e.g., sending harassing, insulting, or illegal email, streaming or downloading movies using the Foundation's internet connection) is prohibited. Abuse or over-use is not be permitted. You are prohibited from using the Foundation's IT resources to access, send, copy or forward any material that is harassing, offensive, sexually oriented, illegal or defamatory, e.g., no viewing pornography, no e-mailing inappropriate jokes.

You must help maintain the security of the Foundation's technology and systems, as well as its records and other information. Do not access systems to which you are not authorized, or help anyone else to do so. Use your password to access your computer (never sign on as someone else), and do not share your password or leave it visible to others. To protect the Foundation's information from inadvertent disclosure, lock your computer even if you leave it for only a few minutes (just press *Control + Alt + Delete* at the same time). Do not "borrow" a colleague's password, credentials, grounds pass etc., and do not loan anyone yours.

NOTE RE: USING YOUR OWN DEVICE – While the Foundation permits senior personnel to connect to the Foundation's systems using their own personal devices, however, there are limitations, and your equipment must meet certain technological and security standards before it will be allowed to connect. Similarly, while in the Foundation's network / technology environment the use, transmission, distribution, or storage of any material in violation of the Foundations [Confidentiality Policy](#) , [Data Protection Policy](#), is prohibited.

DATA AND RECORDS

The Foundation maintains many business and financial records in a variety of formats, including paper, digital, and other. You must cooperate in accurate record-keeping of the Foundation. Do not damage, delete, alter, conceal or create false or misleading data, documents, or other records of the Foundation. Employees are expected to adhere to the Foundation's [Records Retention Policy](#).

CONFIDENTIAL INFORMATION

Some information at the Foundation must remain confidential, including personal details of colleagues, medical records, bids, and proprietary information such as intellectual property, and more. Do not disclose the Foundation's confidential or proprietary information (that has not been made public) to anyone outside of the Foundation, or inside the Foundation except those within the Foundation with a legitimate need to know as part of their official duties, or as authorized by the Director. Please be sure to exercise the utmost discretion in regard to all the Foundation's work. If information has not been made public, it may be confidential – if in doubt, consult your manager or the Director. Refer to our policy on [Confidentiality](#) and [Data Protection](#) for further information.

FRAUD

Fraud and corruption in any form is unacceptable at the Foundation. This includes bribery, bid-rigging, kickbacks, reciprocity, theft, embezzlement, forgery, making false statements (including submission of false medical claims), and corrupt practices.

Fraud is any act of omission an individual knowingly misrepresents or conceals a material fact:

a) in order to obtain an undue benefit or advantage or avoid an obligation for himself, herself, itself or a third party and/or

b) to cause an individual or entity to act, or fail to act, to his, her or its detriment.

Corruption is the act of doing something with an intent to receive an inappropriate advantage with official duties, to obtain a benefit, to harm or to influence improperly the actions of another party.

The Foundation has a zero tolerance for fraud and corruption, meaning that there are no acceptable excuses for staff members, other personnel, vendors, partners and responsible parties to engage in bribery, fraud or corruption.

All incidents of suspected fraud and corruption are to be reported by email:

poshcommittee@thepromisefoundation.org

PROTECTING THE FOUNDATION'S INTERESTS AND REPUTATION

A. YOUR POSITION IN THE FOUNDATION

We should all feel proud of our work at the Foundation. The Foundation expects you to be impartial and loyal to the Foundation, and to act with integrity at all times. Therefore you are to:

- not exaggerate your position or abuse it for personal benefit.
- not intentionally misrepresent your function, official title, or overstate the nature of your duties to anyone.
- not use your position as a means of convincing or coercing someone to provide you favourable treatment.

B. DIGITAL MEDIA, PUBLICATIONS AND PUBLIC SPEAKING

The Foundation uses both traditional and digital media, such as Facebook, Twitter, Instagram, and web pages as critical tools to inform the public about, and engage interest in, our work.

If speaking to the media, posting on social media or publishing (digitally or otherwise) is part of your official duties, you must not advance your personal point of view or support a position on a matter that is not supported by the Foundation.

If speaking to the media, posting on social media or publishing (digitally or otherwise) is *not* part of your official duties, you do not speak for the Foundation. Retweeting a Foundation tweet is acceptable, but embellishing it is not.

If you are not speaking on behalf of the Foundation, before considering speaking to the press, issuing statements, taking part in media productions, or submitting books, articles or other material for publication or electronic dissemination related to the work of the Foundation, you must seek and obtain prior approval by the Director.

When using social media for *personal* purposes, add a disclaimer in your social media profile that your views are personal and do not necessarily reflect the endorsement of your employer. Use care, discretion and good judgment when posting and leaving comments on social media sites. Do not use the Foundation's logo or indicate an official connection with the Foundation so as to avoid confusion.

Do not publish anything that you would not want to see reported in the news, or that can harm the reputation of the Foundation

Do not engage in any social media activities that can serve to embarrass you, your co-workers or the Foundation. Refer to our [Social Media Policy](#) for more details.

C. INTELLECTUAL PROPERTY

All programs, documents, communications, presentations, research generated as part of your work at the Foundation belong to the Foundation.

All software solutions developed or purchased for the Foundation belong to the Foundation.

Software licensed to, or developed for, the Foundation must not be used for your personal use.

You must take care not to infringe on the intellectual property rights of others. This means, you may use other organization's information or creations only if it is available in the public domain without restrictions, or consent has been received.

You must not install, copy or download information or programs unless you have a license to do so.

You must not install, copy or download illegally or pirated copies, or otherwise violate licensing agreements or copyright law.

D. DEALING WITH THIRD PARTIES – EXTERNAL PARTNERS, DONORS, CONTRACTORS, NGOS AND VENDORS

The Foundation often engages third parties, including vendors or suppliers, NGOs, partners or private sector organizations. Prior to engaging third parties, we must conduct appropriate due diligence in order to avoid engaging in business transactions with parties who do not meet the Foundation's expectations with regard to ethical behaviour and business practices. In doing so, consideration should be given to the following:

- Does the proposed relationship create the impression of favouritism or lack of objectivity
- Are you affiliated with the external party?
- Is there a conflict of interest?

All vendors and partners with a contract in excess of Rs. 500,000 are expected to comply with the Foundations [Supplier Code of Ethics](#) and sign the [Pre-Onboarding Conflict of Interest Declaration](#) . You may not sign any contract on behalf of the Foundation unless you have the authority to do so.

BEHAVIOR TOWARDS OTHERS – RESPECT AND TOLERANCE

The Foundation partners with a number of international organizations, universities, governments, non-governmental organisations, corporates and other entities. Our partners expect us to role model ethical standards. You are therefore expected to demonstrate at all times respect, tolerance and professional behaviour towards your colleagues and others, both within and outside of the Foundation.

Your behaviour reflects directly on the Foundation. It has an impact on the Foundation's credibility and reputation, which in turn, effects the willingness of donors and partners to continue their engagement with us.

A. ENCOURAGE DIVERSITY

At the Foundation, we welcome people from different backgrounds and cultures. We expect you to respect people for their differences. We expect you to value these differences and the contribution diversity of language religion, culture and customs make to the work that we do. We expect you to respect local culture and abide by local laws, where local culture and traditions are in conflict with human rights (for example, if local culture promotes inequality based on caste) your behaviour must be guided by the Foundation policy.

B. NO SEXUAL EXPLOITATION OR ABUSE

The nature of our work at the Foundation puts us in contact with people in the communities we serve where there is often great disparity in economic and social power between Foundation staff and the individuals among the public we serve.

Sometimes people we serve or with whom we work may be very susceptible, weak or helpless. You have a particular duty of care to protect the vulnerable and treat people with respect and dignity at all times.

The Foundation has a zero tolerance Policy for the Protection against Sexual Exploitation and Abuse (PSEA). You are prohibited from taking advantage or exploiting others for sexual or other illicit purposes, both in the workplace and outside.

Sexual exploitation includes an actual or attempted use or abuse of a position of power or trust for sexual purposes.

Sexual abuse includes an actual or threatened physical intrusion of a sexual nature, through force coercion.

Exchange of money, employment, food, goods or services or other preferential treatment for sex, sexual favours or other exploitative behaviour is expressly prohibited.

Sexual activity with persons under the age of 18 is also prohibited, regardless of the local age of majority or of consent. Mistaken belief of the age of a person is NO defence.

For more information refer to our policy [Prevention of Sexual Exploitation and Abuse](#).

C. NO HARASSMENT OR ABUSE OF AUTHORITY

The Foundation does not tolerate harassment – sexual or otherwise - or abuse of authority. We all must behave in a manner that is free of intimidation, hostility, offence and any form of

harassment or abuse. We expect you to be respectful to your colleagues and treat them fairly.

Workplace harassment includes bullying and is considered improper and unwelcome conduct. It includes words or actions that can reasonably be expected to cause offense or humiliation to another person, to marginalize or exclude a person, or to unreasonably disrupt that person's work. For more information refer to our policy on [Anti-Harassment](#).

Sexual harassment is any unwelcome sexual advance, a request for sexual favour, or any other behaviour of a sexual nature that can reasonably be expected to cause offense or humiliation to another person. For more information refer to our policy on [Sexual Harassment](#) and our policy on [Prevention of Sexual Exploitation and Abuse](#).

Abuse of authority is the improper use of one's position of influence or power, including the use of power for personal gain. Foundation staff must not abuse their authority or position such that it is offensive, humiliating, embarrassing or intimidating to another person.

D. NO DISCRIMINATION

The Foundation treats all individuals as equal and worthy of regard without discrimination. We expect you to do so as well. As such, you must not engage in any unfair differential treatment based on:

- Race
- Ethnicity
- Creed
- Social or political background or affiliation
- Colour
- Nationality
- Religion
- Age
- Gender
- Disability
- Physical attributes
- Marital status
- Family size
- Sexual preference or orientation
- Social origin
- Class or Caste

When evaluating job applicants, you must consider only the objective, job-related criteria such as experience, skills and integrity to determine who will best fill the needs of the Foundation.

OUR POSITION ON DRUGS AND ALCOHOL

The misuse and abuse of drugs and alcohol, both legal and illegal is prohibited as it interferes with creating a safe and productive work environment.

The Foundation prohibits the use, possession, distribution or sale of illegal drugs by its staff. Staff are not to conduct Foundation business while under the influence of illegal drugs or alcohol.

Use of prescription drugs is permitted, provided that its use does not pose a risk to the employee or others and does not impair the employee's ability to perform his or her work safely. As per the guidelines provided in the [Safety in Fieldwork Policy](#), you are required to keep the Director informed of any prescription drugs you might be taking, that could affect your work in the field.

OUR POSITION ON CONDUCT OUTSIDE OF WORK AND POST-EMPLOYMENT RESTRICTIONS

A. OUTSIDE OF WORKING HOURS

As an employee of the Foundation, how you conduct yourself in your private life reflects upon how others view the Foundation. We expect all staff will embody the Foundation's values in all that they do and say both inside and outside the workplace. This means that you must not act in ways that can bring disrepute to the Foundation, compromise its interests, or undermine its position. You are also expected to obey local laws and honour your private legal commitments.

B. POST-EMPLOYMENT RESTRICTIONS

You have a perpetual obligation to maintain the confidentiality of proprietary and other non-public information that you acquired through your work at the Foundation. Whether you resign, retire, or are involuntarily terminated, your obligations of confidentiality do not cease when your service ends. Please read our [Confidentiality Policy](#) for more details.

YOU HAVE A DUTY TO COMPLY

DUTY TO COMPLY

The Foundation is subject to the laws, rules or regulations of the jurisdictions in which we operate. We have established policies and practices to govern your/our behaviour. Ignorance is no excuse - you are expected to know and obey the rules and standards that apply to you. If you are unsure of what to do, or whether a particular rule or policy applies to you, seek guidance from your manager.

You are obligated to follow policy even when another individual does not, including your management. If you are asked to do something that you know, or believe, violates a rule or policy you are expected to refuse to do so.

OBLIGATIONS AT EVERY LEVEL

Leaders are no different than entry level staff; we are all bound by the same ethical standards of the Foundation. Leaders, however, have a special obligation to act as role models and set the "tone at the top". This includes mid-level managers whose day-to-day responsibilities put them in close contact with staff.

All managers and supervisors are expected to provide advice and guidance, to support good conduct, and foster a culture where staff feel free to raise concerns, ask questions and make suggestions without fear of reprisal or retaliation.

We are not only responsible for our own actions, or inactions, we are also responsible for influencing the behaviour of our co-workers and peers.

CONSEQUENCES OF NON-COMPLIANCE

Integrity is doing the right thing, even if no one is watching. It is our expectation that staff should be honest and engage in good, appropriate, ethical behaviour.

If you are found to have violated rules, regulations, policies, standards, or local laws, you may be subject to discipline up to and including demotion, loss of privileges summary dismissal or termination of your contract/employment. In some cases this may include referral to local law enforcement authorities.

REPORTING WRONGDOING AND PROTECTION FROM RETALIATION

YOU HAVE A DUTY TO REPORT

If you see something, say something.

This means that management and leaders must maintain an open-door, speak up culture, where staff and other personnel can approach them with their concerns, without fear of punishment or loss of confidentiality. If you see, or suspect, that a Foundation staff member or other personnel, or a vendor, supplier, partner, NGO or anyone else is acting or has acted improperly (or if you receive credible information from someone else that leads you to believe there may be improper activity taking place, such as harassment, fraud or corruption etc.), ***you have an obligation to report the suspected misconduct without fear of reprisal or retribution.***

Speak to your manager or, if you have concerns raising the matter with your manager, speak to another manager. Alternatively, you may contact the Ethics Committee directly at poshcommittee@thepromisefoundation.org.

Due to the small size of our office, anonymous reports will not be investigated, and we offer all or staff protection against retaliation to remove any fear of reporting wrongdoings or misconduct. You have the option to approach the Ethics Committee for confidential advice at poshcommittee@thepromisefoundation.org. The Ethics Committee cannot be compelled to disclose the matter you discuss, or the fact that you sought its guidance.

PROTECTION FROM RETALIATION

The Foundation supports an open environment and actively promotes “whistleblowing”. This means we encourage you to come forward, speak out and speak up about concerns you may have of possible misconduct, harassment, fraud, discrimination, abuse of authority, or other wrongdoing. Reporting in good faith is viewed as taking **positive** action, and is seen as *you* protecting the best interests of the Foundation and its partners. For more information refer to [Protection Against Retaliation Policy](#)

WHISTLEBLOWER PROTECTION

You are encouraged to make good faith reports of wrongdoing without fear of punishment or retaliation. The Foundation supports a culture where employees can speak-up and feel comfortable raising their concerns. Under the Foundation’s [Protection Against Retaliation Policy](#), the Ethics Committee is empowered to protect staff, contractors, interns from

retaliation for good faith reporting of misconduct or for cooperating with duly authorized audits or investigations. Retaliation is itself misconduct. If you believe that you have been subject to retaliation or a threat of retaliation because you reported misconduct or cooperated with an audit or investigation, contact the poshcommittee@thepromisefoundation.org for confidential advice and guidance.

ETHICAL DECISION-MAKING

MAKING ETHICAL DECISIONS

While we are also expected to (generally) follow rules, situations can arise where sometimes we are unsure whether the rules apply, or we are faced with unique sets of facts. How do you make an “ethical” decision? When faced with an ethical dilemma, consider the following:

- What are the relevant facts? What are the issues? Who may be affected by this decision?
- Are there specific rules and guidelines for this situation? Does it comply?
- Do you have information that should cause you to question taking certain action?
- Will my decision reflect well on the Foundation in the eyes of the public, its partners and donors?
- How would I feel if my decision were to appear on the front page of tomorrow’s newspaper or circulated on social media?
- Do I need help deciding what to do?

If you are not certain what to do, get the advice you need. Seek guidance from your manager, Assistant Director or Director.

Gideon Arulmani
Director,
The Promise Foundation
Dated: 28 April 2021