



# VillageReach

*Code of Conduct and Organizational Ethics*

LAST UPDATED:

June 2022

## Message from President

*Dear VillageReach Employees:*

*We have adopted this guide as our VillageReach Code of Conduct and Organizational Ethics (The Code). It summarizes the principles and expectations that guide our actions in our work. VillageReach expects all employees to uphold the highest level of ethics as part of our responsibility as representatives of the organization, its mission, and the resources that have been given to us to steward and use responsibly. In addition to employees, we expect our agents, consultants, contractors, partners, representatives and suppliers to be guided by The Code.*

*We strive to conduct business in ways that reflect The Code — collectively as an organization and as individual agents within the organization. Through communications and training, we continually link individuals to our Mission, our Vision, our Organizational Values and the expectations in The Code. We believe that our people are our most powerful asset, and therefore the most important reflection of who VillageReach is as an organization. The honesty and integrity of the people who represent VillageReach is a requirement for us to be successful at achieving our mission.*

*As an organization, VillageReach will hold itself to the highest standard of honesty and integrity. We count on all of our agents to do the same.*

*Sincerely,*

*Emily Bancroft  
President*

# Table of Contents

## VillageReach Code of Conduct and Organizational Ethics

1.	Introduction .....	5
2.	Our Values.....	5
3.	Internal Communication.....	5
4.	Honesty and Integrity .....	6
5.	Accurate Record Keeping and Recording of Costs.....	7
6.	Employment Practices .....	7
7.	Confidentiality.....	8
8.	Diversity, Equity & Inclusion.....	8
9.	Conflicts of Interest.....	10
10.	Political Influence.....	11
11.	Protection from Sexual Exploitation & Abuse.....	11
12.	Human Rights.....	12
13.	Working with Government.....	12
14.	Environmental Compliance .....	13
15.	Reporting Violations of the Code .....	14

16. What to Expect When You Report a Potential Violation of the Code .....14

# 1. Introduction

---

This Code of Conduct and Organizational Ethics (**The Code**) applies to all members of the Board, employees, contractors, consultants, partners, representatives, suppliers and sub recipients of VillageReach globally. In this document, these stakeholders will collectively be referred to as “Agents.” In addition to The Code, VillageReach employees are expected to adhere to VillageReach policies laid out within their Employee Handbook as well as any other policies or procedures communicated to the employee. For employees, this Code and the Employee Handbook are intended to be read hand in hand. VillageReach expects all employees to uphold the highest level of ethics as part of our responsibility as representatives of the organization, its mission, and the resources that have been given to us to steward and use responsibly.

# 2. Our Values

---

At VillageReach, we hold certain behaviors as vital to our success. Our Values are:

- Diversity and Inclusion – Equitable participation enhances our collective impact.
- Innovation – Creativity and fearless exploration foster lasting change.
- Collaboration – Strong partnerships built on trust are vital to our mission.
- Excellence – Integrity, experience and continuous learning drive quality results.



# 3. Internal Communication

---

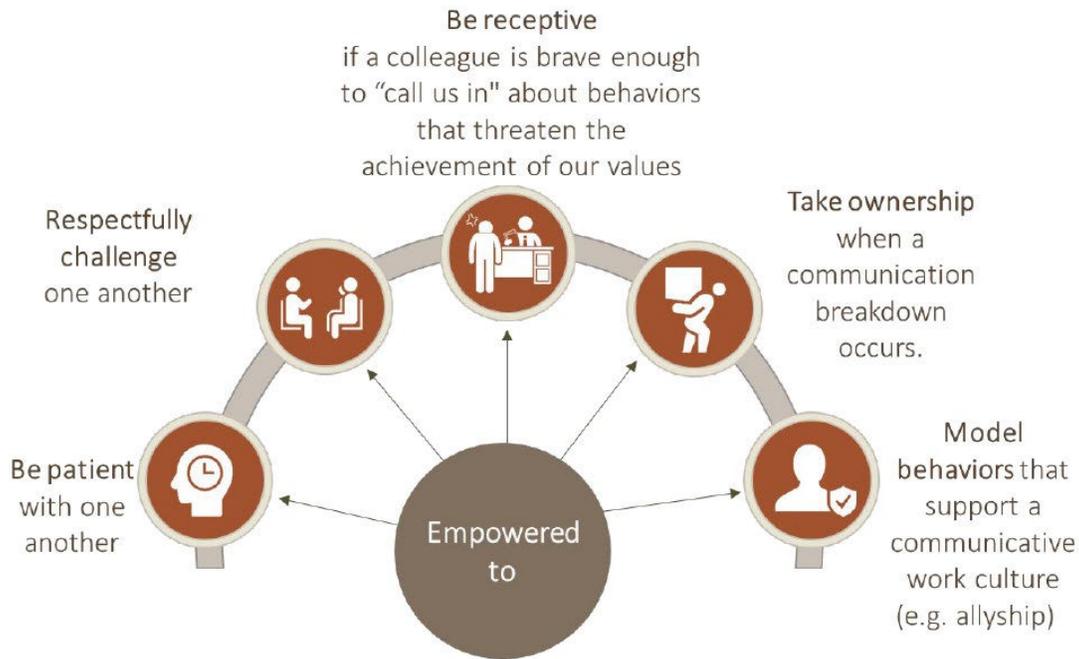
Our principles for internal communication establish standards for the ways in which we interact with one another and help us uphold our values. Effective internal communication promotes organizational excellence by making space for team members to feel included, heard, respected and valued. Inclusivity and mutual respect lay the foundation for stronger working relationships and collaboration. When we collaborate with people who have different experiences from us, it challenges us to think outside the box and anticipate alternative viewpoints. Using strong communication practices that uphold our organizational values helps us to make progress towards realizing our organizational mission. VillageReach’s internal communication principles include the following:

1. Respect and embrace differences in perspectives.
2. Challenge your own biases and assumptions.

3. Actively consider how your actions impact others.
4. Respect your colleagues and invest the time and attention that we all deserve.
5. Be authentic. Say what you mean and do what you say.

These five principles guide us to establish healthy team norms, behaviors and practices. For more information, please reference our Internal Communications Resource Guide.

Figure 2: All Employees Should be Empowered To:



## 4. Honesty and Integrity

---

Honesty and integrity are vital behaviors of Agents of VillageReach. We expect that everyone will conduct themselves with honesty and integrity personally and professionally. Honesty means “adherence to the facts: sincerity; or, fairness and straightforwardness of conduct.”<sup>1</sup> Integrity means, “firm adherence to a code of especially moral or artistic values: incorruptibility.”<sup>2</sup>

These definitions represent our expectation of Agents of VillageReach to be guided by “what is right” as they pursue their work, by holding themselves to high ethical standards and being accountable to others.

When confronted with a decision or complex situation, ask yourself “What ethical implication might arise from this decision?” We encourage Agents to seek advice from someone (supervisor,

<sup>1</sup> [merriam-webster.com/dictionary/honesty](https://www.merriam-webster.com/dictionary/honesty)

<sup>2</sup> <https://www.merriam-webster.com/dictionary/integrity>

HR or accounting) to help evaluate a situation. VillageReach also has an external, confidential hotline [EthicsPoint](#) for guidance or questions.

As a learning organization, VillageReach strives not only to adhere to the principles and rules in this Code but we also strive to continually increase our ethical standards.

## 5. Accurate Record Keeping and Recording of Costs

---

All transactions and records must be documented in a manner that clearly describes and identifies the true nature of business transactions, assets, liabilities or equity and classifies and records in a proper and timely manner, entries on the books of account in conformity with applicable accounting standards. No record, report, entry or document shall be falsified, distorted, misdirected, deliberately misleading, incomplete or suppressed. Improper accounting and documentation and fraudulent financial reporting is not only against VillageReach's policy but also a violation of law and government regulations. Such violations potentially include personal liability, both civil and criminal, as well as sanctions against VillageReach.

Agents are further expected to maintain and comply with internal control standards and procedures to ensure that financial records and reports are accurate and reliable. Theft is forbidden and will not be tolerated. No one should rationalize or even consider misrepresenting facts or falsifying records. This is illegal, will not be tolerated, and will result in disciplinary action.

The expectation of accurate record keeping extends to the representation of time spent on VillageReach business (such as timesheets and invoices) as well as expenses and requests for reimbursements.

No Agent shall commit VillageReach to contractual obligations which are beyond the scope of that Agent's internal authority.

## 6. Employment Practices

---

VillageReach is committed to fair employment practices and a safe workplace in every location in which we work. Every employee has the right to work in surroundings that are free from all forms of unlawful discrimination. VillageReach will not engage in or tolerate any discrimination in the workplace prohibited by applicable laws in the countries where we work. Discrimination is defined as "prejudices or prejudicial outlook, action or treatment."<sup>3</sup> Specifically, no employee will be discriminated against on the basis of their color, nationality, tribe or place of origin, race, social origin, political opinion, religion, gender, pregnancy, marital status or family responsibility,

---

<sup>3</sup> <https://www.merriam-webster.com/dictionary/discrimination>

disability, HIV/AIDS status, age, previous military service, trade union membership or activity, or sexual orientation, or any other basis prohibited by applicable law.



VillageReach stands with employees in intolerance of inappropriate behavior. Harassment will not be tolerated at VillageReach at any level within the organization. Harassment is conduct that creates a hostile, intimidating or unwelcome environment. VillageReach is committed to providing a workplace that is free of verbal, physical and visual forms of harassment so that everyone can work in a productive, respectful and professional environment. Harassment in employment based on gender, race, national origin, religion, age, sexual orientation, disability, or any other basis prohibited by applicable law is strictly prohibited. VillageReach does not tolerate harassment, based upon any protected status, by anyone in the workplace - supervisors, co-workers, or non-employees and other Agents.

## 7. Confidentiality

---

Agents may have access to and learn confidential and proprietary information about VillageReach and its activities during their interactions or employment. Agents may also have a contractual obligation to safeguard the confidential information of our partners. Agents are expected to keep such information confidential and not disclose such information to any third party without prior written authorization from the respective Country Director or an Officer, as appointed by the Board of Directors, of the organization.

Prior to sharing any information, ask yourself “Is anything I am about to share considered confidential?” We encourage Agents to seek advice from someone (supervisor, HR or accounting) to help evaluate a situation prior to acting.

This policy does not preclude an employee from discussing the employee’s terms and conditions of employment with other employees or a third party if the employee so chooses.

Personnel records are generally considered confidential. Medical records are maintained separately from other personnel records and may be subject to more limited access. Access to the general personnel file is limited to those who have a need to know the information. Employees who work with these records are expected to safeguard their confidentiality.

## 8. Diversity, Equity & Inclusion

---

At VillageReach, we believe that diverse, equitably weighted perspectives foster organizational capacity to create new solutions that improve health access in historically under-served and hard-to-reach communities. As an organization that works primarily in Africa, we recognize the

continued impact of the history of racism and colonialism in our industry, and in the countries where we work.

To align our values, innovations and impact, VillageReach is committed to recruiting and retaining a diverse global workforce and providing mechanisms for all staff and the Board of Directors to engage openly around the issues of race, colonialism, gender, identity, and culture through quarterly learning opportunities and open discussions.

To uphold our values and hold ourselves accountable, we are committed to take concrete actions to identify and dismantle historic power dynamics that are at the root of these issues. We also recognize the autonomy and value of local government and communities and are committed to ensuring their voices are represented in the design and implementation of our work.

Diversity refers to the differences between people. Diversity includes, but is not limited to, differences of color, nationality, tribe or place of origin, race, religion, gender, disability, HIV/AIDS status, age, sexual orientation and gender expression or identity. VillageReach values a diverse work environment because different backgrounds, experiences and perspectives expand potential approaches to problem solving and, furthermore, support the advancement of the VillageReach mission. A diverse work environment is attractive and important from both internal and external perspectives. Given the specific geographies where we operate, VillageReach is categorically committed to improving racial, cultural and experiential diversity among the members of our team.

Equity - is the promotion of justice, objectiveness and fairness within the policies, processes and distribution of resources within VillageReach to provide equal opportunity for staff. Our focus is on identifying and eliminating barriers that have prevented the full participation and opportunity of growth for some groups.<sup>4</sup>

Inclusion is an organizational commitment to and practice of creating a work atmosphere where all individuals feel welcomed, valued, respected, and supported. We believe that an inclusive environment enables and promotes meaningful employee contributions, supports employees to realize their personal and professional potential and strengthens the impact of our organizational work.

Along with incorporating these values into how we organize, manage, and support our own teams, VillageReach also incorporates these principles in our work by:

Centering government voices. Government participation is necessary during solution design and throughout implementation in order to align with government priorities and ensure sustainability. Learn more about how we work with governments.

---

<sup>4</sup> [www.D5coalition.org](http://www.D5coalition.org)

Respecting local stakeholders at all levels. We aim to raise up the voices of communities, health workers and government. Our code of conduct explains how we protect the communities we work in.

Avoiding deficit-based language and imagery. We have created language and photography guidance documents that walk through external communication preferences.

## 9. Conflicts of Interest

---

Employees are expected to avoid situations that might cause their personal interests to conflict with, or appear to conflict with, the interests of VillageReach or which might compromise, or appear to compromise, VillageReach's reputation or integrity. A conflict of interest, or the appearance of one, occurs when the employee or a member of the employee's immediate family uses the employee's position for personal benefit or for personal gain. A financial interest or investment, personal association, or business relationship with a vendor, supplier or competitor that interferes with the employee's ability to exercise independent judgment on VillageReach's behalf is prohibited.

VillageReach seeks to avoid actual or the appearance of conflicts of interest. Always ask yourself "Could a personal or business relationship influence or appear to influence my decisions or actions?" Agents are expected to disclose any potential conflict or appearance of conflict of interest to either their supervisor (employee) or their VillageReach contact (external agent) respectively. We encourage Agents to seek advice from someone (supervisor, HR or accounting) to help evaluate a situation. VillageReach will determine whether a conflict or potential conflict of interest can be managed or whether it is unacceptable to the organization.

VillageReach believes it is in its best interest to keep business and professional relationships separate from personal and family relationships. To prevent the appearance of or actual conflicts of interest, VillageReach generally will not employ an employee's relatives.

VillageReach also reserves the right to refrain from employing relatives of our Board Members, relatives of high-level employees at organizations who compete with VillageReach, or relatives of employees who work at our major clients or vendors where such a restriction is a reasonable step towards avoiding the actuality or appearance of a conflict of interest or to protect confidential information.

Employees are discouraged from accepting meals or other gifts from salespeople, vendors, suppliers, or any other solicitors. The acceptance of a gift of \$25 USD from any of these sources or more must be disclosed to the employee's supervisor. Nothing of value may be accepted from a government official. (See Section 12 for additional rules that have been adopted for situations involving government officials.)

## 10. Political Influence

---

No VillageReach funds, facilities, services or other resources may be used to support or oppose political parties or candidates for office.

## 11. Protection from Sexual Exploitation & Abuse

---

VillageReach recognises that, as a respected global organization, those working with us have increased power and privilege. We are committed to safeguarding everyone who encounters VillageReach through our work from abuse of that power and privileged. Ensuring the safety of everyone who is part of our work brings to life the VillageReach values of *Diversity and Inclusion, Innovation, Collaboration and Excellence*, which we consider vital to our success.

Ensuring that VillageReach is a safe environment for everyone who participate in our activities, people with whom we work and our staff and representatives, is everyone's responsibility.

VillageReach Agents must:

- Be mindful of the position of trust that they occupy as an employee or representative of VillageReach.
- Ensure that all their engagement with people with whom we work, encounter or who work for VillageReach is appropriate, not exploitative or abusive, and does not take advantage of any imbalances of power that may exist.
- Ensure that they observe expected boundaries in their contact with people who participate in our activities, including their use of social media and/or digital media.
- Declare any relevant allegations made, or any civil and/or criminal charges or convictions received prior to or during their employment, volunteering with, or representation of VillageReach.
- Report and share information of any allegation, concern, or suspicion of any form of abuse of another person.

VillageReach Agents must never:

- Engage or attempt to engage in any form of sexual activity with anyone under 18 years of age, regardless of the age of consent locally. Mistaken belief in the age of a child is not a defence.
- Engage or attempt to engage in any form of sexual activity or inappropriate behavior with people who participate in our activities or with whom we work.
- Imply or suggest that payment, protection, assistance (goods or services, including financial services), employment or any opportunity is received because of participation in any exploitative or harmful behavior, including any form of sexual activity.
- Support, condone or take part in any form of sexual exploitation or abuse, including trafficking of human beings.
- Engage in transactional sex of any kind, regardless of the law locally.

Incident Reporting

Agents must report any allegations and concerns about staff and representatives or the welfare of anyone to the PSEA Focal Point within 24 hours, by reporting via Ethics Point hotline (number in link) or

online: <https://secure.ethicspoint.com/domain/media/en/gui/62797/index.html> or by mobile:



<https://villagereach.navexone.com/>.

## 12. Human Rights

---

VillageReach respects the human dignity and natural rights of all persons. We prohibit activities that infringe upon these rights in employment, governance, and in our relationships with partners, collaborators, and the people who are beneficiaries of our programs.

VillageReach prohibits trafficking in persons in every aspect of our organizational activities and is committed to monitor ourselves and our subcontractors and agents to prevent any engagement in these prohibited activities.

VillageReach prohibits the use of forced labor in every aspect of our organizational activities.

VillageReach prohibits the abuse, exploitation or neglect of children in every aspect of our organizational activities.

VillageReach prohibits the promotion of sex trafficking and prostitution in every aspect of our organizational activities. Institutional resources may never be used in the procurement of commercial sex acts.

Any violation or suspected violation should be reported to our confidential reporting hotline [EthicsPoint](#). As a federal awardee, VillageReach will notify the USAID office of Inspector General upon receipt of any credible information regarding a violation of human rights. You may always contact the Global Human Trafficking hotline at 1-844-888-FREE or at [help@befree.org](mailto:help@befree.org) to report any suspected human trafficking.

## 13. Working with Government

---

VillageReach has established standards of conduct for all Agents when interacting with any government officials that are consistent with applicable anti-corruption laws and regulations. These standards of conduct are established to prevent the improper exchange of anything of

value, which may present an actual or perceived conflict of interest. When working with any government or any government official (in any country), always conduct yourself in accordance with these standards.

Bribery of a government official is prohibited. Bribery is defined as the offering, promising, paying, giving, soliciting or accepting anything of value in order to wrongfully influence the recipient, induce a person to misuse a position of authority or trust or to obtain an advantage. A bribe can be paid directly or indirectly (i.e. via a third party such as a contractor or a family member), with or without money exchanging hands. It can be for the benefit of someone other than the person who is receiving the bribe or being improperly influenced.

Facilitation payments to a government official are prohibited. Facilitation payments are defined as payments of small value, paid to an individual government official to obtain routine government actions, which the official is otherwise obligated to perform (such as processing permits, licenses, or visas, or providing police protection or services). Facilitation payments do not include legitimate administrative fees or legitimate payments to fast-track services when paid to an organization or governmental unit (not to an individual) and for which a receipt may be issued.

Gifts of any value to a government official are prohibited. (Excluded from the definition of gift, is payment of per diem or travel expenses of a foreign government official made in the course of an approved programmatic activity such as travel expenses to enable a government official to attend a training session as part of an approved work plan.)



If an individual perceives a danger to liberty, personal safety or security arising from a government official's demand for a payment, the individual may use their judgment in determining whether to make a payment. Any such payment made in the interest of personal safety and security must be promptly reported to the respective Country Director or an Officer of the organization.

Receiving gifts, including meals, from a government official is prohibited. VillageReach Agents may not solicit a gift from a government official.

Agents are responsible for reporting all instances of corruption or bribery or other violations of these ethical standards to their supervisor, HR, accounting or to our confidential reporting hotline [EthicsPoint](#).

## 14. Environmental Compliance

---

In conducting our work, VillageReach will endeavor to identify any environmental consequences that may result, and will adopt appropriate environmental safeguards as necessary to mitigate those consequences.

## 15. Reporting Violations of the Code

---

You have several different channels to report violations or potential violations of this Code, including your supervisor, VillageReach contact, human resources or accounting representative and the reporting hotline through Navex Global [EthicsPoint](#) confidential and secure reporting structure.

If you have good reason to believe that a violation of the Code or a contract provision has occurred, or you are asked to violate the Code or a contract provision, ***don't remain silent***. Report such violations, or suspected violations; depending on the circumstances, failure to report may itself violate the Code.

We do not tolerate violations of the Code and continually strive to increase our ethical standards. Remember that no unethical or illegal acts can be justified by saying that they benefited the organization, or that they were directed by a higher authority in the organization.

When faced with an ethical dilemma, it is always better to obtain guidance before acting. Ask yourself whether you are facing an ethical issue or a violation of the Code. Seek advice from your supervisor, HR, accounting or from [EthicsPoint](#).

## 16. What to Expect When You Report a Potential Violation of the Code

---

***VillageReach will not tolerate retaliation against employees who raise truthful concerns to any source. This is without regard to your position or the position or relative authority of involved people.***

VillageReach's process for investigating an alleged violation of the Code is to gather information and consider if the evidence is creditable. The investigation may include conducting interviews of other witnesses or parties involved and/or review of other forms of documentation that may be available.

The VP, Programs or the VP, Global Operations will lead the investigation but may designate leadership to another party, such as the People team Director, a Country Director, or Accounting. Those designated leaders have the authority to make independent decisions in response to the alleged violation without management interference. At the conclusion of the investigation to the alleged violation, a determination will be made to the validity of the violation. If it is determined that there is creditable evidence, the party (ies) involved in such violation will be disciplined and/or terminated accordingly based on organizational policy. Additionally, VillageReach will report any

and all illegal acts (criminal and/or civil) and/or false claims to its donors and governments as required.

### **What can you expect when you report a potential violation of the Code?**

- Your concerns will be treated seriously and fairly.
- You will be treated with dignity and respect.
- You need not identify yourself.
- Whether you identify yourself or not, your communication will be kept confidential to the greatest extent possible.
- If your concerns are not resolved at the time you call, you will be informed of the outcome. If you report anonymously, you can follow up on the status or outcome of a case through [EthicsPoint](#).

Due to privacy considerations, you likely will not be informed of the details of any discipline that may result from the investigation into your concerns. VillageReach takes its obligations very seriously and will take the appropriate actions in response to violations of the Code, even if these actions are not visible to you.

Remember, there is never a penalty for reporting suspected violations of the Code provided you allegations are not knowingly false. People in a position of authority cannot stop you. Efforts to try and stop a report of violation of the Code are subject to disciplinary action which may include termination of employment. Please make your report as accurate and truthful as possible. Do not intentionally include false or misleading information in your report. The intentional reporting of false or misleading information can result in internal disciplinary actions, or civil or criminal liability.