# CODE OF CONDUCT

# **Message from the Founder**

At Amal Alliance, we hold high ethical standards and value doing things right. We work hard every day to bring hope and promise back into the lives of displaced children; enhancing their lives, their community, and the rest of the world.

To ensure smooth operations, we take every step with high integrity, honesty, and transparency. We treat all with respect and dignity, no matter their race, color, religion, sex, gender identity, pregnancy, age, national origin, sexual orientation, familial status, military or veteran status, disability or genetic information (including family medical history). We employ strategies against sexual exploitation and abuse and sexual harassment and strive to maintain a safe and happy working environment.

Doing things right is not optional at Amal Alliance, for we strive to uphold our organizational values by following the code of conduct outlined in this document. Thank you for your commitment to the betterment of humanity, and for helping us provide the best possible programs to displaced children worldwide.

Danielle De La Fuente Founder & CEO, Amal Alliance



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#### Introduction

Amal Alliance ("<u>Amal Alliance</u>") is a 501(c)(3) nonprofit, non-governmental organization that aims to help displaced children at refugee camps and informal settlements across the world through education and integration programs. Staff, partners, interns, and volunteers participating in Amal Alliance's programs are subject to the observance of Amal Alliance's rules and procedures.

# **Ethical Principles and Core Values**

Amal Alliance's core values and ethical principles are, but are not limited to:

- Respect for others
- Integrity
- Honesty
- Transparency
- Responsibility
- Establishing Meaningful and Trusting Relations
- Providing displaced children with the education they need and crave
- Helping displaced children heal their wounds from trauma by providing psycho-social support
- Advocating for those with no voice i.e. unaccompanied refugee children
- Being accountable for one's actions
- Obedience to the law, both domestic and international
- Observance of Cultural Norms
- Empathy and Compassion for others
- Teamwork
- Zero tolerance towards sexual harassment or sexual exploitation and abuse
- Commitment to the code of conduct

# **Decision Making and the Code of Conduct**

When making a decision, ask yourself the following before proceeding:

- Is it legal?
- Does it comply with the code?
- Does it reflect Amal Alliance's values and ethics?
- Does it respect the rights and human dignity of others?
- Does this in any way undermine the work we are trying to accomplish?

## Reporting/Speaking Up

Amal Alliance encourages all employees to ask questions and raise issues without fear of retaliation. To honor this commitment, we treat any reports seriously and investigate them thoroughly.

Employees must report suspected unethical, illegal or suspicious behavior immediately. To report a concern:

- Talk to your supervisor
- Contact the founder (the "Founder") or the board of directors (the "Board of Directors")
- Make a confidential and/or anonymous report online through our info@amalalliance.org email address

#### No Retaliation

Amal Alliance does not tolerate retaliation against anyone who makes a good faith report of suspected misconduct or otherwise assists with an investigation or audit. Employees who report a concern in good faith cannot be subjected to any adverse employment action including:

- Unfair dismissal, demotion or suspension
- Unfair denial of a promotion, transfer or other employment benefit
- Bullying and harassment, either in person or online
- Exclusionary behavior
- Any other behavior that singles out the person unfairly

# **Equal Opportunity**

Amal Alliance will not tolerate discrimination based on race, color, religion, sex, gender identity, pregnancy, age, national origin, sexual orientation, familial status, military or veteran status, disability, genetic information (including family medical history) or any other protected class.

### Harassment

Treat all fellow employees, participants, donors, and business partners with dignity and respect at all times.

Any type of harassment, including physical, sexual, verbal or other, is prohibited and can result in disciplinary action up to, and including, termination. Every complaint will be investigated fully.

Harassment can include actions, language, written words or objects that create an intimidating or hostile work environment, such as:

- Yelling at or humiliating someone
- Physical violence or intimidation
- Unwanted sexual advances, invitations or comments

- Visual displays such as derogatory or sexually-oriented pictures or gestures
- Physical conduct including assault or unwanted touching
- Threats or demands to submit to sexual requests as a condition of employment or to avoid negative consequences

## **SEA Policy**

Amal Alliance has put in place a policy against sexual exploitation and abuse (the "<u>PSEA Policy</u>"). All employees and related personnel are expected to abide by the PSEA Policy and follow the directives described therein.

# **Bullying**

We are committed to ensuring that our employees, contractors and all participating in programs, work in a safe and respectful environment that is free of bullying. Bullying can include:

- Spreading malicious rumor or gossip
- Excluding or isolating someone socially
- Establishing impossible deliverables
- Withholding necessary information or purposefully giving the wrong information
- Excessive badgering over e-mail
- Intimidation
- Impeding someone's work
- Unfairly denying training, leave or promotion
- Constantly changing work guidelines
- Sending offensive jokes or emails
- Criticizing or belittling someone constantly
- Tampering with a person's personal belongings or work equipment

#### **Conflict of Interest**

A conflict of interest can occur when an employee's personal activities, investments or associations compromises their judgment or ability to act in Amal Alliance's best interests. Employees should avoid the types of situations that can give rise to conflicts of interest.

It's important for employees to disclose any relationships, associations or activities that could create actual, potential, or even perceived, conflict of interest to their supervisor.

## **External Communication on Behalf of Amal Alliance**

Only the Founder, Board of Directors, or designated representatives have authority to represent Amal Alliance to media and/or legal authorities. Employees should refer all requests for information or interviews to their supervisor.

## Confidentiality

Amal Alliance and its employees maintain the confidentiality of all proprietary information.

Proprietary information includes all non-public information that might be harmful to Amal Alliance, it's programs, and partners if disclosed.

## Confidential information can include:

- Terms of partnerships and MOUs
- Organization policies and procedures
- Marketing plans and strategies
- Fundraising strategies
- Trade secrets
- Internal discussions both verbal and in writing
- Information regarding curriculum and training curriculum
- Participant lists
- Supplier lists and materials
- Any other information that could damage Amal Alliance or its programs if it was disclosed

## **Privacy**

Amal Alliance complies with the requirements of the country's international privacy laws. All employees sign an agreement that contains provisions for information confidentiality and non-disclosure.

Amal Alliance and its employees do not disclose any private, personal information of employees, program participants, partners, sister orgs, competitors, or third parties.

Employees are required to report any breaches of privacy, including the loss, theft of or unauthorized access to personal information, to their manager.

# **Gifts and Entertainment**

While gifts and entertainment among business associates can be appropriate ways to strengthen ties and build goodwill, they also have the potential to create the perception that business decisions are influenced by them. Amal Alliance is committed to working solely on the merits of its services, and complies with all legal requirements for giving and receiving gifts and entertainment.

#### Employees are to:

- Use sound judgment and comply with the law, regarding gifts and other benefits
- Never allow gifts, entertainment or other personal benefits to influence decisions or undermine the integrity of business relationships
- Never accept gifts or entertainment that are illegal, immoral or would reflect negatively on Amal Alliance

Employees may accept occasional unsolicited personal gifts of nominal value such as promotional items and may provide the same to customers and business partners.

When in doubt, employees should check with the ethics and compliance officer before giving or receiving anything of value.

# **Record Keeping**

All documents, databases, voice messages, mobile device messages, computer documents, files and photos are records. Employees should never destroy documents in response to, or in anticipation of, an investigation or audit.

Employees are required to:

- Maintain these records and protect their integrity for as long as required
- Maintain official record keeping systems to retain and file records required for business, legal, financial, research or archival purposes
- Dispose of your records according to Amal Alliance's records retention and disposition schedule

## **Protection and Proper Use of Amal Alliance's Assets**

Amal Alliance requires all employees to protect its assets and donations. All assets and donations should be used for legitimate purposes, efficiently, and for Amal Alliance business only. Assets include facilities, equipment, devices and information systems, employee time, confidential and proprietary information, corporate opportunities, and organization funds. Suspected incidents of fraud, theft, negligence, and waste should be reported.

# **Money Laundering**

Amal Alliance complies with anti-money laundering laws. Money laundering is the process of concealing illicit funds by moving them through legitimate businesses to hide their criminal origin.

Employees must never knowingly facilitate money laundering or terrorist financing and must take steps to prevent inadvertent use of Amal Alliance's business activities for these purposes. Employees are required to immediately report any unusual or suspicious activities or transactions such as:

- Attempted donation from an unusual financing source
- Arrangements that involve the transfer of funds to or from countries or entities not related to the program
- Unusually complex deals that don't reflect a real business purpose
- Attempts to evade record-keeping or reporting requirements

# **Anti-Bribery**

No illegal payments of any kind are to be made to any local, state or federal government officials in the United States or to government officials of any other country, territory or municipality at any time or under any circumstances. Moreover, no funds or other assets of Amal Alliance are to be paid, directly or indirectly, to government officials or persons acting on their behalf or to representatives of other businesses for the purpose of influencing decisions or actions with respect to Amal Alliance's activities. Kickbacks to or from any person are prohibited.

Any question as to whether a gift or payment would be considered improper under Amal Alliance's guidelines or under law must be discussed with the Amal Alliance's legal counsel. Under no circumstance is it acceptable for you to offer, give, solicit or receive any form of bribe, kickback, payoff, or inducement.

You may not use agents, consultants, independent contractors or other representatives to do indirectly what you could not do directly under this Code of Conduct or under applicable law, rules

and regulations.

## **Health and Safety**

Amal Alliance conducts business in accordance with applicable health and safety requirements and strives for continuous improvement in its health and safety policies and procedures.

All employees are expected to perform their work in compliance with applicable health and safety laws, regulations, policies and procedures and apply safe work practices at all times in all locations. Employees are required to immediately report workplace injuries, illnesses, or unsafe conditions.

#### **Environment**

Amal Alliance is committed to operating in an environmentally responsible manner, from the provision of products and services, to the operation of its offices and facilities, selection of suppliers and other business activities.

Amal Alliance complies with all applicable environmental laws and regulations as well as self-directed commitments to sustainable practices and environmental protection.

# **Intellectual Property**

Employees have a personal responsibility to protect any intellectual property or trade secrets of Amal Alliance from misuse or misappropriation, including Amal Alliance's Colors of Kindness Program that was released under a Creative Commons Attribution-NonCommercial-NoDerivatives 4.0 International License (CC-BY-NC-ND) and any educational materials prepared in connection with Amal Alliance's educational programs.

#### **Information Technology**

Amal Alliance expects its employees to help it safeguard all equipment and data against intentional malicious acts by individuals inside or outside Amal Alliance.

Amal Alliance safeguards against inappropriate access by individuals or groups untrained in correct organization policies or procedures.

## **Travelling**

Work travel requires adherence to all code of conduct rules, regulations, and policies as a representative of Amal Alliance. The PSEA Policy shall be reviewed prior to travel and observed at all times. There is zero tolerance for any inappropriate action. All travel and accommodation costs shall be approved prior to travel and fall within the budget. Accommodation shall be booked at the standard level of 4-star rating hotels. The standard form of travel is economy class, unless otherwise agreed in writing, noting that Amal Alliance's standard during COVID is refundable flights with baggage.

#### **Use of Social Media**

Social media provides opportunities to network and create exposure for Amal Alliance and its brand. Amal Alliance respects the right of employees to use social media for personal and professional purposes. However, the use of social media in ways that can embarrass Amal Alliance are strictly prohibited.

Employees are responsible for complying with Amal Alliance's policies and procedures when communicating on social media. Employees are accountable for any information they publish online.

# Employees are required to:

- Respect the privacy of other employees or program participants and refrain from publishing photos of them without their consent
- Ensure any information they post related to Amal Alliance is accurate
- Comply with the rules of the social media sites they use

# Employees must not:

- "Pretext", or pretend to be someone they are not online
- Speak on behalf of Amal Alliance if they are not expressly authorized to do so
- Share confidential information about Amal Alliance, its clients, stakeholders or participants
- Post comments or pictures that could harm Amal Alliance's brand nor reputation

# **Corporate Social Responsibility**

Amal Alliance understands that corporate social responsibility extends to our entire supply chain. This encompasses not only the products and services supplied but also the human rights, ethics and social practices of Amal Alliance and its suppliers.

Forced Labor: Amal Alliance and its suppliers shall employ all employees under their own free will with no one being subjected to bonded or forced labor. This policy applies to not only the supplier's business operations but also those of their supplier network with which Amal Alliance conducts its business.

Child Labor: Amal Alliance and its suppliers shall not employ any people under the minimum legal working age of the country in which they work.

Responsible Environmental Impact: Amal Alliance and its suppliers shall produce measurable environmental impact reports and conduct ongoing efforts to reduce environmental pollution while increasing sustainability.

Amal Alliance encourages and supports involvement in the community that has supported it. This includes supporting local business and talent by, for example, sourcing local products and services, where appropriate, and showcasing the work of local artists in Amal Alliance's public spaces.

## **Code of Conduct Acknowledgement**

I have read and I understand my responsibilities related to the Code of Conduct. I agree to abide by its principles, and report to Amal Alliance any violations of the code. I understand that I may be removed if I violate any of the rules outlined in this document.

Signature		
Printed Name		
Date		