

HEIFER INTERNATIONAL
Global Policies and Procedures Manual

Code of Conduct Policy	Policy Effective Date: 13 March 2018
	Department of Origin: Human Resources
	Policy Number: GLO.05.03.003

PURPOSE

This document establishes Heifer Project International's (Heifer) policy regarding conduct of Employees, Temporary Workers and Interns.

Wherever Heifer has a presence around the world, it strives to conduct its operations and programs according to the high standards of conduct expected by its donors and project participants. This Code of Conduct applies to every country or territory where Heifer has a presence. Should applicable law conflict with this policy, then the applicable law will supersede this policy in regard to that provision.

POLICY

No Employees, Temporary Workers or Interns shall engage in the following actions:

- 1) Authorize the use of Heifer's name, intellectual property, endorsement, services or property for the benefit or advantage of any person, except in conformance with Heifer policy or guidelines.
- 2) Maliciously misrepresent Heifer's official position to the public on any issue.
- 3) Publicly use any Heifer affiliation in connection with the promotion of politics, religious matters or positions on any issue not in conformity without Heifer's permission.
- 4) Use or disclose, outside of authorized business purposes, either directly or indirectly, any of Heifer's Confidential Information, as defined in this policy, or medical information whether or not the information is acquired, learned, attained or developed by the Employee, Temporary worker or Intern or in connection with others.
- 5) Engage in unprofessional behavior toward a donor, visitor, co-worker, management, vendors, project partners or project participants while carrying out of Heifer business.
- 6) Manage, use or convert Assets, funds or other Heifer property in ways that violate Heifer policy or are contrary to Heifer's best interest. This policy does not prohibit Employees from communicating about terms and conditions of their employment with Heifer.
- 7) Engage in outside employment that creates a conflict or appears to create a conflict with the interests of Heifer.
- 8) Operate a business or related operation that creates a conflict or appears to create a conflict with the interests of Heifer.
- 9) Accept gifts, gratuities, or entertainment (other than small items of token or insubstantial value), or payments or loans from any individual, entity, or organization doing business with or seeking to do business with Heifer.

- 10) Retaliate against any Employee, Temporary Worker or Intern who seeks advice from, raises a concern with or makes a complaint to a supervisor or other member of management, the Whistleblower reporting tool or any other program about fraud, waste, abuse, policy violations, discrimination or harassment, illegal conduct, unethical conduct, unsafe conduct or any other misconduct by Heifer, its Employees, Temporary Workers or Interns.
- 11) Engage in harassment or discrimination of any kind, including harassment or discrimination based on race, color, religion, sex, genetic information, national origin, disability, age, pregnancy, sexual orientation, veteran status, or any other protected status, or engage in any retaliation.
- 12) Fail to cooperate fully with any investigation carried out in connection with this Code of Conduct or any other Heifer policy.
- 13) Knowingly raise false or defamatory allegations against another Employee, Temporary Worker, or Intern.
- 14) Engage in illegal behavior either in or away from the workplace that results in the Employee, Temporary Worker, or Intern being unable to perform his/her duties or appear at work or creates a situation in which his or her ability to work effectively with co-workers is impaired.
- 15) Create a Hostile Work Environment.
- 16) Request that an Employee, Temporary Worker, or Intern commit an illegal act on or in Heifer's property or during the course of conducting Heifer business.
- 17) Use or possess weapons of any type on or in Heifer's property unless (a) specifically required in the performance of job duties and approved by the appropriate reporting structure or (b) otherwise authorized by applicable law.
- 18) Undertake Heifer's work under the influence of alcohol, illegal drugs or illegally used Controlled Substances.
- 19) Consume, use, possess, sell, transport, purchase, deliver, solicit for, accept or distribute drugs, narcotics, intoxicants, or related items or materials designated by law as illegal or dangerous to the health and safety of others while on or in Heifer equipment or property.
- 20) Consume alcoholic beverages while operating Heifer owned or provided equipment. Alcohol may only be consumed on Heifer property during special events or under special circumstances with the approval of the appropriate reporting structure.
- 21) Use a hand-held cell phone, without a hands-free device, while operating a Heifer-provided vehicle, or operate any vehicle while using a Heifer-issued cell phone, for Heifer-related business, without a hands-free device. The terms "use" and "using" include, but are not limited to, answering or making phone calls, engaging in phone conversations, and reading or responding to emails, instant messages, and text messages.
- 22) Falsify, misrepresent, alter, or omit information from any official Heifer documents or documents prepared by Heifer to comply with applicable laws.

- 23) Fail to report an injury received while conducting Heifer work, or while on or in Heifer property.
- 24) Promote, advocate, solicit, or engage in Prostitution.
- 25) Promote, advocate, solicit, or engage in Human Trafficking.

Depending upon its severity, a violation of this Policy may result in disciplinary action or other action up to and including termination. Disciplinary action may include, but is not limited to, eliminating or limiting certain conditions established under policies or procedures such as eligibility to receive bonuses, merit increases, salary increases, promotions, apply for positions with Heifer or to hold a Heifer credit card. A verbal or written warning is not required before an individual may be disciplined or terminated under this Policy.

All Employees, Temporary Workers and Interns are required to sign the Policy Acknowledgement Form annually certifying that in all Heifer activities, they shall meet these standards. This policy is not intended to restrict, discourage or deter the rights of Employees under applicable law, such as prohibiting Employees from communicating amongst themselves or to management about terms and conditions of their employment with Heifer.

DEFINITIONS

Assets – Heifer’s name, intellectual property, endorsements, funds, property and any other resources controlled by or for Heifer’s benefit.

Commercial Sexual Activity – Any sexual activity on account of which anything of value is given to or received by any person.

Confidential Information – Confidential Information as described by Heifer’s Confidentiality Policy.

Controlled Substances – Substances whose general availability is restricted by laws, rules and regulations.

Employee – Any member of Heifer’s workforce who is identified as an employee, in accordance with applicable law, by Heifer’s Human Resources department.

Hostile Work Environment - An intimidating or threatening work environment that unreasonably interferes with a person’s work performance typically caused by discrimination or harassment in the workplace, including but not limited to discrimination in hiring, promotion, discharge, pay, fringe benefits, job training, classification, referral, and other aspects of employment on the basis of race, color, religion, sex (including pregnancy and sexual orientation), age, disability, genetic information, national origin, veteran status, or other protected status.

Human Trafficking – The recruitment, transportation, transfer, harboring, or receipt of persons by improper means (such as force, abduction, fraud, or coercion) for an improper purpose, such as forced labor. The term “Human Trafficking includes Sex Trafficking.

Intern– A member of Heifer’s workforce, who works either full-time or part-time, who generally is a student seeking to gain work experience, and be either paid or unpaid. Paid interns are considered to be Heifer employees and may be excluded from certain benefits.

Unpaid interns are not considered Heifer employees and are not eligible for benefits. (See specific policies and procedures for eligibility/applicability.)

Prostitution – Procuring or providing any Commercial Sexual Activity.

Sex Trafficking – The recruitment, harboring, transportation, provision, or obtaining of a person for the purpose of Commercial Sexual Activity.

Temporary Worker – An individual who provides services to Heifer through a contractual relationship between Heifer and a staffing agency for a specified or finite period of time and/or to complete a defined set of tasks; also referred to as an “agency temp.” The individual is an employee of the staffing agency and is not considered a Heifer employee.

PROCEDURES

The actions outlined in this Code of Conduct are not an exhaustive list. Supervisors, in consultation with the appropriate reporting structure and Human Resources (HR), are responsible for determining whether certain actions violate this Code of Conduct. Any disciplinary action will be administered after consulting with HR.

Alleged violations of this Code of Conduct will be investigated. Serious violations of this Code of Conduct may result in immediate termination and, where applicable, full restitution of funds and prosecution. If a formal warning is issued under this policy, the warning will remain active for an appropriate amount of time as determined by applicable leadership in consultation with Human Resources.

Heifer Employees, Temporary Workers, and Interns should report suspected violations of this or any global or country policy by contacting Human Resources or utilizing the Whistleblower reporting tool.

FURTHER INFORMATION

- Global Policies and Procedures Manual (GPPM)
- United States Policy and Procedures Manual (USPPM)
- Country Policies and Procedures Manuals, specifically those policies relating to confidential information, non-discrimination, harassment, illegal substances, workplace violence, nepotism and related issues.

For assistance or additional information, contact the Human Resources Department.

HISTORY

Revisions:

13 March 2018
28 February 2018
1 January 2018
1 May 2017
1 January 2016
19 August 2014
25 May 2014
7 October 2013
30 October 2012
2 April 2012

Origin:

1 July 2010