



Code of Conduct



Partners
In Health

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1 | Partners In Health Code of Conduct

Partners In Health Code of Conduct

1.1 Purpose

The purpose of this Code of Conduct is to outline the guiding principles and behaviors that we at Partners In Health (PIH) expect anyone acting on behalf of PIH to follow. You may be a clinician working for one of our partner organizations on a PIH project; a PIH employee, consultant, or volunteer; or perhaps your relationship with PIH defies traditional definitions. Whatever your relationship with PIH, this Code of Conduct describes the values and standards that we count on everyone at PIH to uphold in our relations with each other, with our supporters, and with those we serve.

Please note that you may not find answers to every situation here, and that certain policies and procedures may vary at the different PIH sites and offices, depending on site-specific laws and requirements. We recommend that you check with the site director or HR representative at your PIH location for the latest site-specific policies and procedures.

The policies and procedures described in this Code of Conduct constitute guidelines only. This Code of Conduct does not constitute a contract of employment and does not create any express or implied promises to you or guarantee any fixed terms.

1.2 Administration

If you have any questions about the information or material in this Code of Conduct, please contact your site director or the HR Generalist in Boston.

2 | Organization

2.1 Our Mission

Partners In Health's mission is to provide a preferential option for the poor in health care. By establishing long-term relationships with sister organizations based in settings of poverty, Partners In Health strives to achieve two overarching goals: to bring the benefits of modern medical science to those most in need of them and to serve as an antidote to despair.

We draw on the resources of the world's leading medical and academic institutions and on the lived experience of the world's poorest and sickest communities. At its root, our mission is both medical and moral. It is based on solidarity, rather than charity alone. When our patients are ill and have no access to care, our team of health professionals, scholars, and activists will do whatever it takes to make them well—just as we would if a member of our own families or we ourselves were ill.

2.2

Our Core Values

We strive to act with...

Commitment

We are tenacious and resolute in our drive to attain social justice.

- We are passionate about our work to break the cycle of poverty and disease.
- We push boundaries; we challenge conventions and the status quo.
- We set high standards of quality for ourselves and others.
- We strive to be efficient, effective, and focused on improving outcomes.
- We are devoted to this work for the long term.

Pragmatic solidarity/ accompaniment

We make common cause with those in need.

- We accompany our patients, colleagues, and partners, working shoulder to shoulder.
- We are responsive to the needs of the most vulnerable; we are flexible and nimble.
- We invest in others to maximize their potential and self-efficacy.
- We recognize that we cannot deliver on this cause alone; we embrace partners and partnerships to help further our work.

Humility

We listen to and learn from others.

- We are deeply attentive to those living in poverty, and we are guided by their input and participation.
- We actively promote a trusting, supportive environment that fosters inclusion, confidence, and the open sharing of ideas.
- We interact with kindness, compassion, and respect.
- We acknowledge and learn from our mistakes.

Integrity

We operate with honesty and fairness.

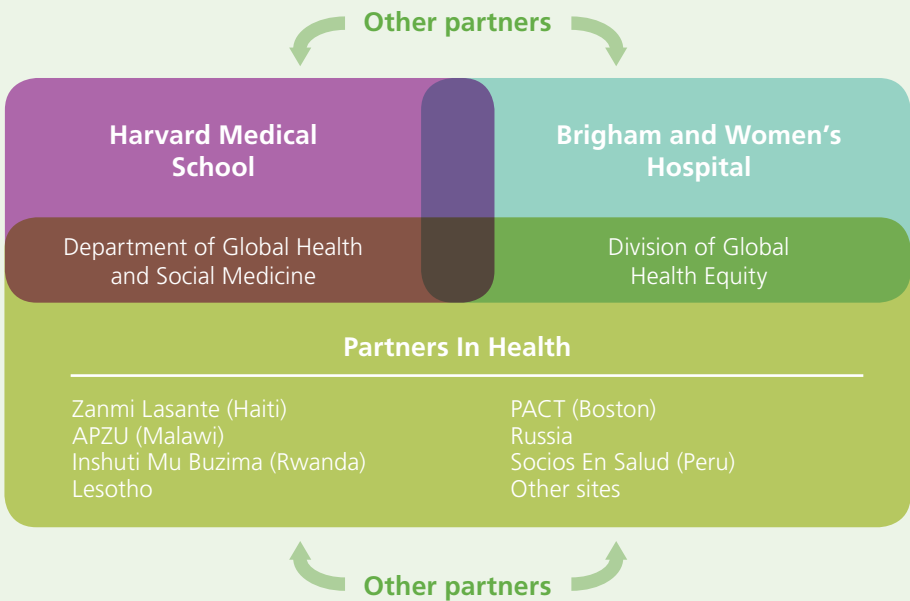
- We are purposefully frugal when we can be, ensuring that resources deployed maximize value to the patients and communities we serve.
- We are transparent and open in our actions and our work.
- We are responsible stewards of resources entrusted to us.

2.3 PIH and Partnership

As our name implies, partnership is the primary tenet on which Partners In Health was founded, and by which we continue to function. From the beginning, we have relied on our associations with Harvard Medical School, Brigham and Women's Hospital, and a myriad of other organizations and institutions to help us build, refine, and strengthen an effective model of healthcare systems. Over the years, these associations have deepened. An understanding of these vital connections is an important part of understanding how we function, how we can continue to evolve and innovate, and your role in making it happen.

A Global Health Delivery Partnership

Innovation and impact in global healthcare services, education, and research



Purpose: This graphic illustrates the interrelationship among Harvard Medical School, Brigham and Women's Hospital, and Partners In Health. These entities collaborate in a partnership devoted to delivering high-quality health care to the destitute sick, advancing scholarship, and advocating for global policy change. We are joined by and embrace a number of other partners dedicated to this work.

2.4 Administration

Partners In Health is a nonprofit corporation and 501(c)(3) public charity, with its principal offices in Boston, Massachusetts. PIH is affiliated with the Department of Global Health and Social Medicine (DGHSM) at Harvard Medical School and the Division of Global Health Equity (DGHE) at Brigham and Women's Hospital. Partners In Health also founded the Institute for Health and Social Justice (IHSJ) in 1993 to serve as the advocacy and policy arm of PIH.

3 | The Partners In Health Workplace

The Partners In Health Workplace

3.1 The Partners In Health Culture

The results we achieve are built upon the way we work with one another. A key component of the PIH model is accompaniment: of our patients and the communities we serve, of course, and also of one another, of our partners, and of our supporters. We do our work by walking side by side with those we serve and with each other: teaching by example, learning by listening, and helping each other to be the best that we can be.

We practice accompaniment in the workplace by:

- Striving to provide a safe and productive work environment for everyone;
- Providing equal opportunity for all;
- Respecting the privacy of our colleagues, patients, clients, and donors;
- Communicating to and about each other with dignity and respect;
- Striving to be honest and transparent;
- Using our resources to provide maximum value to those we serve; and
- Holding ourselves and each other to the highest standards of ethical practice.

The policies which follow are intended to provide specific guidance to help all of us accompany each other on our mission.

3.2 Equal Opportunity—Nondiscrimination and Diversity

PIH is committed to providing equal opportunity in the workplace. PIH will make all employment and other placement decisions without regard to non-job-related factors such as race, color, religion, gender, national origin, ancestry, age, disability, veteran status, marital status, or sexual orientation. This applies to all areas, including, but not limited to, recruitment, hiring, training, promotion, compensation, and benefits.

3.3 Harassment-Free Workplace

We strive to maintain a respectful, nurturing work environment that encourages everyone to perform at his or her best and that fosters growth. Harassment in any form is strictly prohibited at any PIH workplace. Harassment is defined as unwelcome verbal, non-verbal, or physical conduct that denigrates or shows hostility or aversion toward an individual or group.

Threats, whether verbal, written, or via electronic communication, will not be tolerated at PIH. If a PIH employee or volunteer threatens the person, family, or property of another PIH employee, volunteer, or member of a partner organization, the employee accused of threatening behavior will be investigated and dismissed if the evidence is sufficient. In cases where a credible threat of harm has taken place, legal action will be taken.

Sexual harassment is of particular concern. Sexual harassment is defined as unwelcome sexual advances, requests for sexual favors, and other verbal, non-verbal, or physical conduct of a sexual nature when (i) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment by a supervisory employee; (ii) submission to or rejection of such conduct is used by a supervisory employee as the basis for decisions that affect an individual's employment opportunities in a tangible way; or (iii) such conduct is unwelcome and severe or pervasive enough to create an intimidating, hostile, or offensive work environment for a reasonable individual. Acts that constitute sexual harassment include, but are not limited to, unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature. Such acts are often expressions of hostility designed to make another person uncomfortable, or they are an abuse of position or power.

Because the nature of our work often involves interacting with people from a variety of cultural backgrounds, we must be sensitive to the fact that certain behaviors that are acceptable in some cultures are not acceptable in others. Every effort should be made to learn about cultural differences to avoid inadvertently creating an uncomfortable working environment for any member of the PIH family.

3.4 Fraternization

Many of us at PIH form deep, lasting friendships with each other, and, on occasion, more intimate social relationships may evolve. While Partners In Health does not strictly forbid dating or intimate relationships between colleagues, we do prohibit any intimate involvements in which one party may have undue influence over the other, particularly when there is direct reporting or direct supervision between individuals.

Should colleagues at PIH become intimately involved, the relationship must:

- Be disclosed to the immediate supervisors of both parties;
- Not involve direct report or supervision between intimately involved individuals;
- Be entirely welcome, voluntary, and consensual;
- Be unrelated to and not impact or interfere with professional responsibilities and duties of those involved; and
- Not make others uncomfortable or affect their professional responsibilities.

Should a situation arise where individuals in a direct report relationship become intimately involved, immediate disclosure is required. When such situations are reported in a timely manner, PIH will make every effort to retain both parties by changing one or both jobs, as long as the working relationship of all team members is not compromised and a suitable position with a different direct report can be found for one or both parties.

PIH prohibits any person working at a PIH site from paying for sex, under any circumstances. Such behavior is inconsistent with both our mission and our values, as it threatens the health and safety of those who work at our sites, as well as that of the communities we serve.

PIH employees and affiliates, particularly expatriates serving in other countries, should be aware that complications arising out of intimate social relationships may compromise their positions or undermine their effectiveness. If, as a result of any such complications, a person working on behalf of PIH is no longer effective in his or her job, there is no guarantee that PIH will be able to find that person an equivalent position, either in that location or elsewhere.

In addition to intimate relationships, it is inappropriate for family relations to have direct report relationships with one another. PIH has taken on this stance to avoid any professional complications and any employees having undue influence over one another. Should a situation arise, due to promotion, shifting responsibilities, or other unforeseen circumstances, such that family members may be put in a direct report relationship, PIH will make every effort to retain both parties by exploring all possible solutions without compromising the team.

3.5 Workplace Health and Safety

At PIH, we know all too well the detrimental effects that poor living and working conditions can have upon physical and mental well-being. Just as we work to provide clean, safe housing, water, and other facilities to those we serve, we strive to provide safe, healthy working conditions for everyone at our offices and sites. Because of this, we rely heavily on everyone at PIH to adhere to all national and local regulations, as well as any site-specific policies regarding workplace environment, health, and safety. This includes, but is not limited to, regulations and policies related to facilities, sanitation, equipment, and vehicles, as well as prohibitions on drugs, alcohol, weapons, and any controlled substances.

Detailed health and safety guidelines are available from your site HR representative. We encourage you to familiarize yourself with these guidelines and report any concerns or unsafe working conditions to your supervisor or other appropriate PIH representatives.



3.6 Substance Abuse

Substance abuse—whether on or off the job—can endanger the health and safety of our employees and those we serve, affect the quality of our work, and diminish the credibility of PIH and our mission. The abuse of alcohol or drugs—both legal and illegal—is a matter that we take very seriously. For this reason, we have an explicit policy prohibiting substance abuse at all PIH workplaces and wherever PIH business is conducted. We require that all employees, consultants, affiliates, volunteers, visitors, and others associated with PIH adhere to this policy.

We recognize that the nature of the work of PIH, in its various forms and locations, can produce stress. Our work often involves a high degree of responsibility, high stakes, and sometimes a certain degree of risk. The limited availability of services for support and care at our field sites, and the less stringent regulation of drugs that can be misused (such as sedatives and narcotics) in some of the places we work, create a potentially enabling mix of conditions that could lead to substance abuse.

With this in mind, we have established a substance abuse policy as follows:

- Suspected abuse of alcohol or controlled substances will be subject to investigation, and disciplinary action will be taken when deemed necessary. Behaviors suggestive of substance abuse, such as increases in accidents, absenteeism, theft and property losses, or security and policy breaches, may constitute grounds for inquiry into the possibility of substance abuse.
- The unlawful use, manufacture, distribution, dispensation, sale, purchase, or possession of drugs or controlled substances by anyone working on behalf of PIH is prohibited at all times, as is the transportation of controlled substances, drug paraphernalia, or equipment intended for the manufacture or sale of controlled

substances.

- Prescription drugs may only be used by employees and affiliates in the manner prescribed. No prescription drug may be brought to PIH premises by any person other than the person for whom the drug is prescribed, except in cases when drugs are for patient use and being transported for such purpose.
- Employees and affiliates must report any personal conviction for a drug- or alcohol-related offense to the Site Director within five (5) days of the conviction. Failure to notify PIH of a conviction could be grounds for dismissal.

Seeking help for substance abuse

Employees and affiliates who report that they may have substance abuse problems, or who cooperate with inquiries and investigations, will be supported to receive proper counseling and rehabilitation services. Efforts to seek help will not jeopardize any employee's job and will not be noted in any personnel record.

Reporting violations

Managers/Supervisors must report to the Human Resources department any and all violations of this policy, as well as violations of the law that occur on PIH premises or while an employee or affiliate is conducting PIH business. In addition, managers/supervisors shall not personally provide treatment or counseling to any employee or affiliate suspected of having a problem related to drugs or alcohol, but should encourage him or her to seek professional counseling, intervention, or rehabilitation services when appropriate.

Investigation of possible violations

The Human Resources department will thoroughly investigate all reports of violations of this policy and take disciplinary action as appropriate. In taking action under this policy, PIH's first priority will be to protect the health, safety, and well-being of our employees, affiliates, and those we serve.

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Reporting requirements for projects funded by U.S. federal grants or contracts

Any employee or affiliate working on projects funded by U.S. federal grants or contracts who is convicted under any criminal drug statute for a violation occurring in the workplace must notify his or her PIH supervisor in writing within five (5) calendar days of the conviction. Failure to do so may result in disciplinary action, up to and including termination. PIH will notify the federal agency associated with the contract or grant of the covered employee's conviction within ten (10) days after being notified by the employee or any other person with knowledge of the conviction. As a consequence of the conviction, the individual will be subject to disciplinary action, including suspension or termination, and/or required to participate in a drug abuse assistance or rehabilitation program.

Disciplinary actions

In addition to potential legal consequences, violations of this policy may lead to disciplinary action, up to and including termination of employment.

Exclusions

This policy does not apply to the lawful use of prescription drugs or to the possession or consumption of alcohol in the workplace when sanctioned by PIH.

4 | Financial and Business Practices

Financial and Business Practices

4.1 Procurement of Goods and Services

Each year, PIH purchases millions of dollars worth of goods and services. If you are in a position to make purchasing decisions on behalf of PIH, you must conduct business in a manner that is consistent with the goals and mission of PIH. It is critical that suppliers are selected fairly, resources are allocated appropriately, and each transaction is documented accurately and is completed in compliance with any applicable laws and regulations. In addition, efforts should be made to maintain positive and professional relations with vendors, and any disputes should be resolved quickly and equitably. For specific policies and procedures regarding purchases, please contact the Director of International Operations in Boston or relevant site procurement personnel.

If purchases will be made with funds received from a governmental or multilateral funding source such as USAID, PEPFAR, or UNICEF (each a “Special Grant” for purposes of this section), then the purchaser should refer to the guidelines and terms in the separate manual entitled Special Grant Procurement Guide, available from the Director of International Operations. For purchases covered by all other grants, in addition to adhering to the guidelines set forth by the PIH Finance team, the purchaser should refer to the terms of the grant to determine rules and regulations that may apply to the purchase.


4.2 Anti-bribery and Corruption Policy

Integrity is a core value at PIH, so it is very important that all business conducted on behalf of PIH is done in an honest and transparent manner. Corruption and bribery encompass a broad range of behaviors intended to exert influence on the views or conduct of other people to gain advantage. Such behaviors may involve the exchange or presentation of money or gifts, but may also involve doing personal or political favors, or using one’s power or position to influence another’s decision. Such behaviors, or even the appearance of impropriety, can damage the trust that we need to function effectively at all of our sites and in the field. For this reason, PIH is dedicated to ensuring full compliance with all anti-bribery and corruption laws and regulations, including the U.S. Foreign Corrupt Practices Act (FCPA) and the UK Anti-Bribery Act of 2010, as well as any applicable local regulations.

4.3 Conflicts of Interest

We recognize that many of the people who have partnered with us on our mission—employees, volunteers, board members, and other affiliates—have multiple roles, commitments, and interests. This is part of what makes PIH such a unique and vibrant organization. However, when acting on behalf of PIH, it is important that you avoid any situations where your personal or other professional interests could conflict or reasonably appear to conflict with the best interests of PIH. A conflict of interest may exist whenever you have an opportunity to use your position at PIH for personal gain for yourself, a family member, a friend, or any other organization which you support or which a member of your immediate family supports. A conflict of interest may also exist when an outside interest could inappropriately influence your work decisions.

PIH's policy requires disclosure and review of potential conflicts, and prohibits actual conflicts of interest. In some cases, disclosure may be all that is required. That being said, you should always err on the side of disclosure and should recognize that even the appearance of impropriety can harm our work, whether or not actual wrongdoing has occurred.

To report a potential conflict of interest, contact your site-based HR team for specific procedures. In Boston, contact the HR Generalist. 

4.4 Outside Commitments/Employment

We realize that many of us who work or volunteer at PIH maintain consulting or other relationships to other organizations. You must inform your supervisor of any other appointments and/or commitments, especially those that may conflict with any commitments you have made to PIH. Employees who wish to engage in other employment for pay outside the regular working hours must notify their supervisor in writing prior to starting the employment. Outside sources of income may not conflict with or benefit from an employee's or affiliate's position or employment with Partners In Health.

4.5 Gifts, Entertainment, and Favors Received from Third Parties

PIH strictly prohibits accepting gifts, entertainment, or other favors that may be intended to influence, or possibly could influence, a person in the performance of his or her duties, particularly in purchasing decisions.

This does not preclude the acceptance of items or entertainment of nominal or insignificant value which are not related to any particular transaction or activity of Partners In Health.

Below are some guidelines regarding the acceptance of gifts and/or entertainment in accordance with the U.S. Foreign Corrupt Practices Act and its latest revisions:

Gifts:

- The gift should be provided as a token of esteem, courtesy, or in return for hospitality.
- The gift should be of nominal value but in no case greater than \$250 US in a calendar year.
- The gift cannot be in cash.
- The gift must be permitted under local law.
- The gift should be of a value which is customary for the country involved and appropriate for the occasion.
- The gift should be for official use rather than personal use.
- The gift should be presented and received with complete transparency. Gifts over \$100 US in value must be disclosed in accordance with site-specific reporting procedures.

Entertainment:

- All business entertainment expenses must be reasonable.
- The business entertainment expenses must be permitted under local law.
- The business entertainment expense must be commensurate with local custom and practice.
- The business entertainment expense must avoid the appearance of impropriety.

4.6 Gifts, Entertainment, and Favors Provided to Third Parties

Similarly, no person representing PIH may offer gifts, entertainment, or favors to any person or entity with the intention of influencing their conduct or decision regarding any PIH business or transactions. While we do not prohibit giving gifts of nominal value to our friends and partners, they may not be given in conjunction with any PIH business transactions or activities, and they must follow the limitations and considerations listed above regarding the acceptance of gifts.

4.7 Kickbacks

A kickback is a payment or a gift made to someone who has facilitated or is facilitating a business transaction or activity. While we understand the desire to express gratitude to those who help us do our work and the desire to help our friends and partners, we trust that such assistance is given freely and with no expectation of payment, gifts, or favors in return. As such, the offering or acceptance of kickbacks is strictly prohibited.

4.8 Financial Accounting and Reporting

Creating accurate records

All financial information pertaining to PIH and any of its affiliates and subsidiaries must be accurately and completely recorded in order to allow proper preparation of PIH financial statements and to ensure full accountability for all PIH assets and activities to our donors and partners. All financial information, credit card statements, reimbursement requests, time reports, payroll records, reports to government agencies, measurement and performance records, and other records pertaining to PIH business must be prepared with care, honesty, and, as applicable, in accordance with generally accepted accounting principles (GAAP) in the United States of America and/or international financial reporting standards (IFRS).

Prohibited financial practices

We take pride in our record of fiscal responsibility and in assuring our donors and supporters that the vast majority of our resources go towards our programs and the people that we serve. We need the help of everyone at PIH and its subsidiaries and affiliates to ensure that we continue to live up to this commitment. If you become aware of anyone at PIH practicing any prohibited or questionable financial activities, it is your responsibility to report it in accordance with the reporting procedures at your PIH office or site.

Reportable activities include, but are not limited to, the following with regard to PIH and all its subsidiaries and affiliates:

- Fraud or deliberate error in the preparation, evaluation, or audit of PIH accounting reports or financial statements;
- Stealing, misappropriation, or misuse of PIH funds or assets, including PIH property;
- Deviation from the full and fair reporting of transactions or financial position of PIH or any of its subsidiaries or affiliates;
- Misrepresentations or false statements made to or by a senior officer or accountant, regarding a matter contained in the financial records, financial reports, or audit reports of PIH;
- Intentional deficiencies in or noncompliance with PIH's internal accounting controls;
- Fraudulent or deliberately erroneous acts (including a failure to act); and/or
- Any type of illegal behavior or behavior that is otherwise prohibited under PIH's internal policies.

Reporting irregular financial activities

If you believe that PIH or anyone involved in the work of PIH or its subsidiaries or affiliates is, or might be, involved in any of the activities listed above or in other irregular financial activities, or if you receive a complaint or allegation related to such activities, you have a responsibility to report it in accordance with the reporting procedures in the "Whistleblower Policy" section of this Code of Conduct.

4.9 Termination

Your relationship with Partners In Health is "at will," meaning your employment or assignment can be terminated for any reason or no reason, at any time, with or without notice.

Procedures upon separation from employment/assignment

If you leave Partners In Health, regardless of the reason, you must:

- Pay in full any debt you owe Partners In Health
- Return all Partners In Health property, including manuals, keys, computers, etc.

5 | Information and Information Systems

Information and Information Systems

No matter what your role is at PIH, it is likely that you will be storing, creating, and communicating a huge volume of information. Whether it is patient data, financial reports, personal information, meeting notes, photos, announcements, or other publications, it is important that we are aware of how and where this information is stored and transmitted, as well as who has access to it. The following are some guidelines to help you make informed decisions about communications and information at PIH.

5.1 Computers, Computer Systems, Devices, and Services

Use PIH computers, computer systems, and e-mail for PIH purposes.

While the availability of equipment and the technical capacity at each site may vary, when at all possible, you should use PIH computers, devices, servers, and e-mail for all PIH business. This will help us protect proprietary information, as well as personal and patient information. While we do not prohibit the use of PIH equipment and systems for personal use, we ask that you keep it to a minimum in order to preserve your privacy and to conserve PIH resources.

Avoid using personal computer equipment and devices for PIH purposes.

Occasionally it may be expedient or necessary for you to use your personal computer or other mobile communication or computing devices to perform PIH work. Anyone using personal computer equipment or devices should keep the equipment safe from theft, including theft of data, by using security and anti-virus software, secure passwords for access to the equipment itself, and passwords for specific documents and information contained in them. You may also need to encrypt particularly sensitive data. If a computer containing PIH files or information is lost or stolen, it is very important to notify the PIH Management Information Systems Director as soon as possible to ensure that access to PIH systems is disabled.

Avoid using third-party service providers.

While we strongly urge you to use your PIH e-mail address for PIH business, there may be times when it is unavoidable to use non-PIH e-mail addresses and systems such as Google, Yahoo, Hotmail, etc. Due to the large bandwidth needs of these providers and their relative lack of security, these systems should only be used as a last resort.

Be careful when using cell phones and other data-transfer devices.

Whether using a cell phone or device through the PIH-administered cell/data plan or through your own private plan, be careful what information you store or transmit on the device. If any device containing PIH files or information is lost or stolen, notify the PIH Management Information Systems Director as soon as possible to ensure that the device's access to PIH systems is disabled.

Remember that nothing transmitted or stored electronically is private.

PIH does not guarantee the privacy of electronic documents and messages stored in PIH-owned files, disks, storage areas, or electronic media. PIH reserves the right to review and disclose all electronic documents and messages (including e-mail, voice mail, and any other means of electronic communication) that are created, stored, or processed on PIH computers or other equipment, including documents and messages that do not relate to PIH business. In some cases, PIH may also have the right to review electronic communications stored on third-party servers if they are generated or transmitted using PIH equipment or services.

5.2 Confidentiality

Protect confidential information.

The nature of our work often makes us privy to confidential information. Whether this information is of a business or personal nature, each of us is expected to refrain from any mention of confidential information to anyone, except those who have a need to know.

This respect for confidentiality covers a wide range of information, including, but not limited to:

- Patient information;
- Employee, consultant, volunteer, or affiliate personal information;
- Confidential conversations with colleagues or patients;
- Organizational information and decisions;
- Information regarding day-to-day operations;
- Strategic decisions of PIH or its partner projects; and
- Donor and funding information.

Respect privacy and confidentiality in photographs.

Each PIH site has its own restrictions regarding the taking and/or publishing of patient and/or worker photographs. Please discuss these restrictions with the Site Director. Not everyone is comfortable having his or her picture taken, and every individual has a different sense of privacy that should be respected. Do not publish a picture without getting consent from the individual or speaking with your supervisor at PIH.

5.3 Intellectual Property

We expect everyone at PIH to respect intellectual property rights, whether it is the result of your work at PIH or elsewhere. As a rule, any intellectual property that is created by employees, affiliates, volunteers, or others associated with PIH, while working on a PIH project or at any of our work sites, is the property of PIH. If you are unsure whether a discovery, invention, or something you have authored or created at PIH could be considered PIH intellectual property, please check with your supervisor before sharing it. We want to make sure our work, as well as the work of our friends and colleagues, is properly credited and protected.

6 | Communications

Communications

6.1 Media Inquiries

You may receive calls or interview requests from the media from time to time. These requests should be referred to and reviewed by the Communications Department.

6.2 Online Communications and Social Media

Partners In Health has always believed in using all available forms of communication to advocate for the people we serve. Our Communications and Development teams have developed a vibrant online community of supporters and donors using our website, Facebook, Twitter, blogs, and other forms of online media. While communication on behalf of PIH is the primary responsibility of the Boston-based Communications team, we recognize that our staff and affiliates may wish to take part in building this community. However, understand that communication with online communities can have both positive and negative consequences. Our policies and guidelines are designed to provide helpful, practical advice about the use of online media and to protect PIH, our partners, our sister organizations, and our staff worldwide.



For more detailed information and guidelines about online communications, please contact the Communications team at communications@pih.org.

7 | Whistleblower Policy

Whistleblower Policy

7.1 Concerns and Violations

We expect everyone working at PIH or on a PIH project to adhere to the guidelines set forth in this Code of Conduct. If you have any concerns or believe that any part of this Code of Conduct or any other PIH policies have been violated, we require that you report it as soon as possible. You must report it even if you were not directly involved, such as in the case of discrimination, harassment, or inappropriate fraternization. Early intervention is the best way to prevent irrevocable harm.

7.2 Reporting Policies

Each site has specific reporting procedures based on site-specific laws and regulations. You should always follow the site-specific reporting procedures for any site-based concerns. If you do not have access to site-specific reporting procedures, you may use the guidelines below. Concerns and violations may be reported either verbally or in writing. If the complaint is made verbally, the person receiving the complaint will make a written record of the complaint, including such names, dates, and other details as may be applicable. If you have a site-based concern that involves the site director, you must report it to the PIH Chief Operating Officer in Boston. Key contact information is provided at the end of this document.

Boston

1. **Chief Human Resources Officer.** If the Chief Human Resources Officer is involved, or you do not feel comfortable, report to
2. **Executive Director.** If the Executive Director is involved, report to
3. **PIH Chief Operating Officer.** If the Chief Operating Officer is involved, report to
4. **PIH General Counsel**
5. **PIH Chair of the Audit Committee**

Sites

1. **Site HR Manager.** If the HR Manager is involved, or you do not feel comfortable, report to
2. **Program Manager.** If the Program Manager is involved, report to
3. **Site Director.** If the Site Director is involved, report to
4. **PIH Chief Operating Officer.** If the Chief Operating Officer is involved, report to
5. **PIH General Counsel**
6. **PIH Chair of the Audit Committee**

PIH also provides a Keep Us Honest Hotline to report tips and complaints anonymously. Information about this service is available at www.pih.ethicspoint.com, or you may simply use the toll-free number or e-mail address provided below. This information will also be distributed and posted at each PIH office in appropriate common areas.

Keep Us Honest Hotline

Toll-free phone	+1-866-893-7337
Confidential e-mail	keepushonest@pih.org

7.3 Confidentiality

PIH will strive to protect the rights and privacy of all persons reporting about or involved in the investigation of a concern or complaint, to the extent that it does not impede a fair and thorough investigation. We will also protect the confidentiality of those persons accused of misconduct to the extent possible.

7.4 Non-retaliation Policy

Anyone who files a complaint in good faith will be protected from retaliatory action by PIH. PIH will not remove, discharge, demote, suspend, threaten, harass, or in any other manner discriminate against any person working at PIH, or at any of its subsidiaries or affiliates, on a PIH project with respect to good faith reporting of complaints. Any person who retaliates against another individual for reporting perceived violations of this Code of Conduct or for participating in the investigation of reported violations will be subject to disciplinary action up to and including termination of their employment with PIH. Materially adverse acts or omissions that would be sufficient to discourage a reasonable person from making or supporting a complaint will be considered retaliation.

7.5 Investigation

Reported concerns and violations will be investigated in a manner that is consistent with the nature of the complaint, the persons involved, any site-based or legal requirements, and any other factors that PIH management deems relevant. If necessary, PIH will retain the services of outside investigators to ensure a full, fair, and impartial investigation.

7.6 Disciplinary Actions

If Partners In Health finds that any part of this Code of Conduct has been violated, the violator will be subject to appropriate disciplinary action. The specific corrective and disciplinary action taken will be within PIH's discretion and may include termination of the violator's employment or assignment with PIH. In addition, conduct that is unlawful may subject workers to civil or, in some cases, criminal liability.

Partners In Health recognizes that false accusations can cause serious harm to innocent persons. If an investigation results in a finding that the complainant knowingly, falsely accused another person of any violation or inappropriate activity, the complainant will be subject to disciplinary action, up to and including termination of employment and/or legal prosecution in accordance with applicable laws.

8

Criminal Conduct/
Civil Offenses

Criminal Conduct/ Civil Offenses

Obeying the law, both in letter and spirit, is an important part of the ethical standards of Partners In Health. As a representative of PIH or our sister organizations, you are expected to conduct yourself in a way that is responsible, promotes PIH values, and is lawful. Violation of any laws, rules, or regulations of the cities, states, and countries in which we operate, or engagement in behavior that is a civil offense, may be considered a violation of the PIH Code of Conduct, even if the specific criminal conduct/civil offense is not listed in this Code of Conduct. To the extent allowed by law, PIH reserves the right to terminate or suspend your relationship with PIH if you are, or ever have been, under investigation, charged, or convicted of criminal conduct or of certain civil offenses.

9

Key Contact
Information

Key Contact Information

Key Board Committee Members

Position	Name	E-mail	Phone
General Counsel	Lori Silver	lsilver@pih.org	857-880-5170
Co-Founder and Chair of the Board	Ophelia Dahl	odahl@pih.org	857-880-5156

Key PIH Staff—Boston

Position	Name	E-mail	Phone
Chief Operating Officer	Ted Philip	tphilip@pih.org	857-880-5165
Chief Human Resources Officer	Cynthia Maltbie	cmaltbie@pih.org	857-880-5312

For key site staff, contact your site-based Human Resources team or the Human Resources Generalist in Boston.

Partners In Health

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