



A private, nonprofit
organization providing
development and emergency
assistance to Africa
since 1970.

Africare Business Conduct Policies

Approved by the Board of Directors

March 16, 2016

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Africare Code of Ethics

Africare's Code of Ethics is one of strict observance of all laws, rules and regulations applicable to its business. Honesty is not subject to criticism in any culture, and a well-founded reputation for scrupulous dealing is a priceless asset. Directors, officers, and employees should deal fairly with each other, our vendors, clients and others with whom we conduct business. We care how results are obtained, not just that they are obtained.

It is Africare's policy to make full, fair, accurate and timely disclosure in the reports and documents we are required to file with competent authorities. We expect that all transactions shall be accurately reflected in our books and records. We further expect integrity and candor from employees at all levels, and compliance with our policies, accounting rules, and internal controls. Information that is concealed by managers from higher management or auditors can signal to subordinates that Africare policies and rules can be ignored when they are inconvenient. This can impact morale, signal a corrupt defect in our culture, and lead to inaccurate results.

Suspected integrity breaches or violations of this policy should be reported to Africare senior management or whistleblower@aficare.org. In accordance with Africare's Whistleblower Protection Policy, all Directors, Officers and Employees are protected from retaliation for reporting suspected violations.

Africare Anti-Corruption Policy

It is Africare's policy that directors, officers, employees and third parties acting on its behalf are prohibited from offering or paying, directly or indirectly, any bribe to any employee, official, or agent of any government, commercial entity, or individual in connection with the business activities of Africare. A bribe for purposes of this policy is any money, goods, services, or other thing of value offered or given with the intent to gain an improper advantage for Africare.

Suspected violations of this policy should be reported to Africare management or whistleblower@aficare.org. In accordance with Africare's Whistleblower Protection Policy all Directors, Officers and Employees are protected from retaliation for reporting suspected violations.

Africare Conflict of Interest Policy

Africare's Conflict of Interest Policy requires that employees avoid any conflict, actual or perceived, between their own personal interests and the interests of Africare. A conflict of interest can arise when an employee uses their position with Africare for private gain, to advance personal interests or to obtain favors or benefits for themselves, members of their families or any other individuals, corporations or business entities.

Employees are expected to refrain from taking for themselves opportunities discovered as a result of their positions with Africare. It is also a conflict of interest for an employee, during or subsequent to employment, and without proper authority, to give or make available to anyone, or use for personal benefit, information of a confidential nature derived from employment with Africare.

Africare Whistleblower Protection Policy

Africare's Code of Ethics (the Code) requires directors, officers and employees to observe high standards of business and personal ethics in the conduct of their responsibilities. As employees and representatives of Africare, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations. It is the responsibility of all directors, officers and employees to comply with the Code and to report violations or suspected violations in accordance with this Whistleblower Protection Policy.

No Retaliation

No director, officer or employee who in good faith reports a violation of the Code shall suffer harassment, retaliation or adverse employment consequence as a result of reporting. An employee who retaliates against someone who has reported a violation in good faith is subject to disciplinary action. This Policy is intended to encourage employees and others to raise serious concerns about suspected or known violations within our organization in order to enable prompt resolution.

Reporting Violations

Africare encourages every employee to share concerns, problems or ideas with someone who can address them properly. In most cases, that person would be the employee's supervisor. However, if you an employee is not comfortable speaking with their supervisor or is not satisfied with the supervisor's response, the employee is encouraged to speak with someone in HR or anyone in management that the employee is comfortable approaching. Supervisors and managers are required to report suspected violations of the Code to the Chief Governance & Compliance Officer (CGCO), who has specific responsibility to investigate all reported violations. In addition, any suspected violations can be reported to whistleblower@africare.org.

Investigation and Resolution

The CGCO is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Code and shall keep the Chief Executive Officer and/or the Board informed.

Acting in Good Faith

Anyone filing a complaint of a violation or suspected violation of the Code should act in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code. Any allegations that prove not to be substantiated or to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. All reports will be investigated and, where appropriate, corrective action taken.

Africare Fraud Policy

Africare values its reputation for financial integrity and recognizes that incidents of fraud may not only result in pecuniary loss, but may also adversely affect its image and reputation. Therefore, the Board of Directors and management are expected to introduce and maintain effective controls to prevent fraud and to ensure that, if it does occur, it is investigated and resolved promptly. Similarly, employees are expected to act honestly and with integrity at all times, and to safeguard the resources for which they are responsible. Employees play a key role in the prevention, detection and reporting of fraud, and they are expected to be vigilant and to report any concerns at the earliest opportunity.

Africare's Policy is to limit exposure to fraud by:

- maintaining cost effective procedures to deter fraud, including separation of duties where practical, proper authorization practices, and independent reviews of documentation and/ or summary transaction data;
- adopting formal procedures to investigate fraud when it is suspected or reported;
- promoting a climate of openness and an environment where employees feel able to raise concerns responsibly;
- providing appropriate channels for employees to voice genuine concerns and protecting the confidentiality of those who do so;
- rigorously investigating instances of fraud and pursuing perpetrators to seek restitution of assets fraudulently obtained; and,
- assisting appropriate authorities in the investigation and prosecution of those suspected of fraud.

For the purposes of this policy statement, "fraud" is defined as the misuse of Africare's resources or assets by any employee or contractor, for personal gain. Examples of actions constituting fraudulent behavior include:

- misappropriation, misuse or theft of Africare assets or resources;
- participation in sham or fraudulent transactions;
- payment or receipt of bribes, kickbacks or other inappropriate transactions;
- false accounting including dishonestly falsifying any account or any document required for accounting purposes, or furnishing information which may be misleading, false or deceptive;
- unauthorized disclosure or manipulation of sensitive information; and,
- forgery or alteration of any document belonging to the Company.

Suspected incidents of fraud should be reported to Africare senior management or to whistleblower@africare.org, in accordance with Africare's Whistleblower Protection Policy, all Directors, Officers and Employees are protected from retaliation for reporting suspected incidents.

Africare Health and Safety Policy

Africare is committed to conducting its business in a manner that protects the health and safety of employees, clients and others involved in our operations. Through the active participation of every employee, we will strive to prevent adverse health outcomes, accidents, or injuries arising from our operations. We are dedicated to continuous efforts to identify and manage health and safety risks associated with our activities.

Accordingly, with regard to Health matters, it is Africare's policy to:

- identify and evaluate health risks related to our operations that potentially affect employees, contractors or the public;
- implement programs and suitable protective measures to manage such risks;
- provide for the handling of medical emergencies;
- undertake periodic assessments to ensure compliance with this policy.

With regard to Safety matters, it is Africare's policy to:

- design and maintain facilities, establish procedures, provide training and conduct operations in a manner that safeguards people and property;
- respond quickly to emergencies or accidents resulting from our operations;
- comply with all applicable laws and regulations, and apply responsible standards where laws and regulations do not exist;
- undertake periodic assessments of our operations to measure performance and to ensure compliance with this policy.

Africare Harassment in the Workplace Policy

It is Africare's policy to prohibit any form of harassment in the workplace. The objective of this policy is to provide a work environment that fosters mutual employee respect in working relationships. Africare specifically prohibits any form of harassment by or toward employees, clients, volunteers or vendors.

Under this policy, harassment is any conduct which has the purpose or effect of creating an intimidating, hostile, or offensive work environment, unreasonably interfering with an individual's work performance, or affecting an individual's employment or advancement opportunities.

Forms of harassment include, but are not limited to, unwelcome verbal or physical advances and sexually, racially, ethnically or otherwise derogatory or discriminatory materials, statements, or remarks. All employees, including supervisors and managers, will be subject to disciplinary action for an act of harassment.

Individuals who believe they have been subjected to harassment should immediately report the incident to their supervisor, senior management, or their designated Human Resources contact. All complaints will be thoroughly investigated. Africare will treat such complaints as confidential, releasing information only to those with a need to know.

Employees can raise concerns and make reports of harassment without fear of reprisal.