



Global Code of Conduct

January 2023

TABLE OF CONTENTS

1. ETHICAL CODE	3
2. VISION, MISSION AND CORE VALUES	4
3. ABOUT THE CODE OF CONDUCT	5
COMPLIANCE WITH LAW	5
4. CMMB GLOBAL CODE OF CONDUCT POLICIES	6
A. COMPLIANCE HOTLINE POLICY & PROCEDURE	6
B. ANTI-HARASSMENT, DISCRIMINATION AND EEO POLICY	9
C. NON-DISCRIMINATION AGAINST PROGRAM PARTICIPANTS & BENEFICIARIES POLICY	17
D. PROTECTION FROM SEXUAL EXPLOITATION, ABUSE AND HARASSMENT POLICY	17
E. CHILD SAFEGUARDING POLICY	22
F. TRAFFICKING IN PERSONS POLICY	28
G. FRAUD, WASTE, AND ABUSE POLICY	30
H. ANTI-NEPOTISM POLICY	31
J. POLITICAL ACTIVITY POLICY	32
I. ANTI-CORRUPTION POLICY	32
K. DUTY OF CARE POLICY	33
L. TECHNOLOGY-RELATED POLICIES AND STANDARDS	34
M. WORKPLACE VIOLENCE POLICY	38
N. NON-DISCLOSURE OF CONFIDENTIAL INFORMATION POLICY	39
O. POLICY PROHIBITING USE OF DRUGS AND ALCOHOL	40
P. CONFLICT OF INTEREST POLICY	42
EXHIBIT A	43
DISCRIMINATION/HARASSMENT/RETALIATION COMPLAINT FORM	43
EXHIBIT B	45
ETHICAL DECISION GUIDANCE TREE	45

1. ETHICAL CODE

At CMMB we need guidance in setting shared standards, developing good business practices, and living up to our organizational core values: Collaboration, Love, Excellence, Accountability, and Respect. Each of us is expected to maintain the highest standard of ethical conduct when acting on behalf of the organization – and even our behaviors outside of work can reflect on CMMB’s credibility and brand. We are responsible for knowing the laws and regulations of the localities in which we operate or for which we are responsible, as well as the CMMB’s policies that apply to our work and by which we are expected to abide. Management has the added responsibility of demonstrating, through their actions, the importance of our values and Code of Conduct. In any business, ethical behavior does not simply happen; it is the product of clear and direct communication of behavioral expectations, modeled from the top and demonstrated by example. Fundamentally, every member of the CMMB community plays a role in building the culture of CMMB every day and we are all responsible for creating a safe and ethical workplace that we can all be proud to call, CMMB.

To make our Code of Conduct work, managers must be responsible for promptly addressing ethical questions or concerns raised by employees and for taking the appropriate steps to deal with such issues. Managers should not consider employees’ ethics concerns as threats or challenges to their authority, but rather as another encouraged form of business communication. At CMMB, we encourage dialogues on ethics to become a natural part of daily work. To help frame the ethical expectations at CMMB, we expect everyone to:

- Always be fair, honest and trustworthy in our business activities.
- Demonstrate high standards of conduct that promote doing the right thing.
- Protect and enhance CMMB's reputation and image through our words and actions.
- Be accountable for our individual performances and actions that affect others.
- Hold others accountable by questioning a direction that may be a violation of our Code of Conduct.
- Avoid conflicts of interest and/or the appearance of conflict.
- Foster an open and respectful culture that supports personal and professional growth.
- Share knowledge and ideas to help CMMB staff to reach their full potential.
- Safeguard CMMB's financial assets and ensure accurate financial reports and disclosure.
- Report violations of any law or any CMMB policy.
- Effectively manage CMMB's financial risks and assets.

At CMMB, you are expected to comply with both the letter and spirit of this Code of Conduct. It is your responsibility to seek clarification about the application of the Code of Conduct to a specific situation. If you are faced with a dilemma that is not covered directly by the Code of Conduct you may consider using the Ethical Decision Guidance Tree provided in Exhibit B of this document; otherwise, please contact your supervisor or the Director of Ethics and Compliance for consultations. You are expected to contact your supervisor or the Director of Ethics and Compliance if you believe a violation of law or of this policy has occurred. You will not be mistreated for raising questions about the organization’s policies and/or other staff members’ conduct. If you prefer to submit a report anonymously, please refer to the Compliance Hotline Policy (see below section 4.A).

You also are required to cooperate fully with any authorized internal or external investigations. Making false statements to, or otherwise misleading internal or external auditors, legal counsel, or any person charged with handling the investigation, would be considered grounds for your immediate termination.

If you violate the law or CMMB’s policies, or deliberately withhold information during an ethics investigation, you will be subject to disciplinary action, possibly including termination.

2. VISION, MISSION AND CORE VALUES

OUR VISION (what we strive for)

A world, in which every human life is valued, and health and human dignity are shared by all.

OUR MISSION (what we do)

Inspired by the example of Jesus, CMMB works in partnership globally to deliver locally sustainable, quality health solutions to women, children and their communities.

OUR CORE VALUES (how we do what we do)

Collaboration - To work in partnership for locally sustainable solutions.

Love - To embrace and be compassionate towards all people.

Excellence - To deliver sustainable quality, and impactful results.

Accountability - To hold ourselves and each other to high ethical standards and practices, that maintain the good name of CMMB around the world.

Respect - To act always with integrity, and to value and honor the dignity of all.

CMMB'S IDENTITY STATEMENT (why we do what we do)

Embracing the bond between the tenets of Catholic Social Teaching, our values, and a desire to deliver service to those most in need, CMMB is called to provide effective health solutions founded on love and respect for all without discrimination.

CMMB has field operations in the following countries Haiti, Kenya, Peru, South Sudan, and Zambia. All CMMB employees, volunteers and board members are bound by the CMMB mission, vision, values and strategic plan and our code of conduct. Employment policies, procedures and benefits vary depending on the country in which the organization is based and the local requirements of employment contracts.

3. ABOUT THE CODE OF CONDUCT

The CMMB Global Code of Conduct is a collection of standalone policies that provides guidance to all employees, interns, volunteers, officers and members of the Board of Directors ('directors'), with guidance on conducting CMMB business in accordance with CMMB values and policies. The Code of Conduct is an important expression of our commitment to respond to the many legal and ethical complexities in our global healthcare environment. While the Code of Conduct is informative and instructional, it does not provide a complete explanation of all the laws, regulations and policies that we must follow. CMMB's Code of Conduct reflects commitment to its mission, vision, core values and ethics at work. Adherence to these values and to the guidance in this Code of Conduct is required of all CMMB employees, directors, interns and volunteers. **CMMB has a zero-tolerance policy for violations of ethics and Code of Conduct policies** and employees, directors, interns and volunteers may be subject to disciplinary action up to and including termination for violations.

CMMB, at its option, may change, delete, suspend or discontinue any part or parts of the policies in this document at any time without prior notice. Any such action shall apply to existing as well as future employees with continued employment being the consideration between the employer and employee. No one other than the President and CEO of CMMB may approve alterations or modifications of the policies in the Code of Conduct and even then, such modification must be in writing and signed by the President and CEO. No statement or promise by a supervisor, or department head may be interpreted as a change in policy, nor will it constitute an agreement with an employee. Should any provision in the Code of Conduct be found to be unenforceable and invalid, such a finding does not invalidate the entire CoC, but only the subject provision. This Global CoC replaces (supersedes) any other previous Code of Conduct for CMMB.

Nothing in this CoC is intended to preclude or dissuade employees from engaging in activities protected by federal or state law, including the National Labor Relations Act, such as discussing wages, benefits or terms and conditions of employment, forming, joining, or supporting labor unions, bargaining collectively through representatives of their own choosing, raising complaints about working conditions for their and their fellow employees' mutual aid or protection, or any legally protected activities within any jurisdiction of our global operations.

COMPLIANCE WITH LAW

CMMB's commitment to ethics and compliance begins with complying with laws, rules and regulations where we do business. You are responsible for performing your duties in full compliance with all applicable laws and regulations. You may not knowingly participate in any act that violates an applicable law, rule, or regulation of any government, governmental agency, or regulatory body. If you believe that, as a matter of conscience, you cannot do something that you are asked to do, contact your supervisor or the Director of Ethics and Compliance. If you determine that you have unknowingly participated in any act that violates an applicable local, state, or federal law, you must report the violation as soon as possible to your supervisor or the Director of Ethics and Compliance.

4. CMMB GLOBAL CODE OF CONDUCT POLICIES

When confronted with ethically ambiguous situations, this Code of Conduct, CMMB values and specific CMMB policies should be your guide as you confront day-to-day challenges. Moreover, you should use your management as a resource for you to raise concerns or ask for advice. We want to ensure that you have access to any source of advice within CMMB that you need.

Integral to maintaining a compliant and ethical workplace is the staff's understanding that all reports of misconduct or violations against our Code of Conduct will be handled swiftly and communicated to the appropriate leaders. Supervisors who come into knowledge or receive a report detailing a violation against any policy within the Code of Conduct are expected to report this information to either their supervisor, Human Resource Officer, Country Director, the SVP of Programs, Director of Ethics and Compliance, the President and CEO, or through the Compliance Hotline. Anyone found withholding information of potential violations may be subject to disciplinary action.

A. COMPLIANCE HOTLINE POLICY & PROCEDURE

SCOPE

This policy applies to all persons involved in CMMB operations and affairs, including but not limited to, employees (full time, part time, temporary and contract employees), volunteers, interns, board members and all affiliates of the CMMB Global enterprise.

PURPOSE

CMMB is committed to its values and the highest possible standards of ethical, moral and legal business conduct. In conjunction with this commitment and CMMB's commitment to open communication, this policy aims to provide an avenue for employees to raise concerns and have the reassurance that they will be protected from reprisals or victimization for whistleblowing in good faith. However, if an employee feels that their anonymity is not required then they should follow our existing grievance procedure reporting to your direct supervisor, your Human Resources Officer, or the Director of Ethics and Compliance in NY.

POLICY

The whistleblowing policy is intended to cover serious concerns that could have a large impact on CMMB, such as actions that:

- May lead to incorrect financial reporting;
- Are unlawful;
- Are not in line with company policy or values, including the Code of Conduct; or
- Otherwise amount to serious improper conduct.

Regular business matters that do not require anonymity should be directed to the employee's supervisor and are not addressed by this policy.

SAFEGUARDS

Harassment Or Victimization

Harassment of, or retaliation against individuals submitting hotline reports will not be tolerated. Persons who harass employees or other stakeholders who have submitted compliance concerns will face punishment, up to and including dismissal.

Confidentiality

Every effort will be made to protect the reporter's identity by our hotline vendor. Please note that the information provided in a hotline report may be the basis of an internal and/or external investigation into the issue being reported.

It is possible that as a result of the information provided in a report the reporter's identity may become known to CMMB internal hotline managers during the course of an investigation. Hotline managers have been identified and trained to understand the importance of protecting the identity of violation reporters.

Anonymous Allegations

The policy allows employees to remain anonymous at their option. Concerns expressed anonymously will be investigated, but consideration will be given to:

- The seriousness of the issue raised;
- The credibility of the concern; and
- The likelihood of confirming the allegation from attributable sources.

Malicious Allegations

Any individual submitting malicious or untrue allegations may be disciplined for making false accusations.

PROCEDURE

Reporting

The compliance hotline procedure is intended to be used for serious and sensitive issues.

Reporters on the hotline will have the ability to remain anonymous if they choose. Reports are submitted by Lighthouse to CMMB and may or may not be investigated at the sole discretion of our organization.

Serious concerns relating to financial reporting, unethical or illegal conduct, should be reported in either of the following ways:

WEBSITE (THE EASIEST METHOD):

www.lighthouse-services.com/cmmb

ANONYMOUS REPORTING APP:

App download instructions [found here](#)

Use keyword: cmmb

TOLL-FREE TELEPHONE:

English-speaking USA and Canada: 833-204-4685

Spanish-speaking USA and Canada: 800-216-1288

French-speaking Canada: 855-725-0002

Spanish-speaking Mexico: 01-800-681-5340

E-MAIL*:

reports@lighthouse-services.com

***Must include company name with report in email**

FAX*:

(215) 689-3885

***Must include company name with report in fax**

CMMB SUGGESTION BOX

In addition to the Compliance Hotline, we have begun the use of a digital suggestion box to provide any tips or suggestions on how we can improve our organization.

The CMMB suggestion box can be accessed from our web reporting page, or directly at: www.lighthouse-services.com/cmmb/sb.asp

Timing

The earlier an individual can express a concern or issue, the easier it will be for CMMB to take action.

Evidence

Although you are not expected to prove the truth of an allegation, the individual submitting a report needs to demonstrate in their hotline report that there are sufficient grounds for concern.

HOW THE REPORT WILL BE HANDLED

The action taken will depend on the nature of the concern.

Initial Inquiries

Initial inquiries will be made to determine whether an investigation is appropriate, and the form that it should take. Some concerns may be resolved by agreed upon action without the need for an investigation.

Feedback to Reporter

Whether reported directly to CMMB personnel or through the hotline, the individual submitting a report will be given the opportunity to receive follow-up on their concern:

- * Acknowledging that the concern was received;
- * Indicating how the matter will be dealt with;
- * Giving an estimate of the time that it will take for a final response;
- * Telling them whether initial inquiries have been made;
- * Telling them whether further investigations will follow, and if not, why not.

Further Information

The amount of contact between the individual submitting a report and the body investigating the concern will depend on the nature of the issue, the clarity of information provided, and whether the employee remains accessible for follow-up. Further information may be sought from the reporter.

Outcome of an Investigation

At the discretion of the organization and subject to legal and other constraints, the reporter may be entitled to receive information about the outcome of an investigation.

B. ANTI-HARASSMENT, DISCRIMINATION AND EEO POLICY

PURPOSE

CMMB is committed to providing a work environment that supports individual dignity and respect, free from harassment and discrimination. Accordingly, CMMB maintains a strict policy prohibiting sexual harassment, unlawful harassment and any type of discriminatory treatment because of any “protected characteristic.” Protected Characteristics include: sex or gender (including pregnancy, childbirth and pregnancy-related conditions), race, religion, creed, color, national origin, ancestry, physical or mental disability, medical condition, marital status, domestic partner or civil union status, sexual orientation, gender identity or expression, genetic information, familial status, caregiver status, military service and veteran’s status, alienage or citizenship status, age, status as a victim of domestic violence, sex offenses or stalking, arrest conviction record, credit history, unemployed status, or any other basis made unlawful by federal, state or local law or ordinance or regulation. Such harassment and discrimination are unlawful and shall not be tolerated.

SCOPE

These policies apply to all persons involved in CMMB operations and affairs, regardless of immigration status, and prohibits unlawful harassment or discrimination by or against any, employee, intern, volunteer, independent contractor, vendor, visitor or client of CMMB. Unlawful harassment and discrimination are prohibited at the workplace, at employer-sponsored events, and anywhere that work-related functions are performed.

All reported or observed conduct violating this policy will be promptly and thoroughly investigated. Where harassment or discrimination is determined to have occurred, CMMB will take prompt and appropriate disciplinary action, up to and including, without limitation, immediate termination of employment of the accused harasser.

a) **ANTI-DISCRIMINATION/EQUAL EMPLOYMENT OPPORTUNITY**

PURPOSE

We embrace diversity and demonstrate respect towards all people—it is one of our core values. We are committed to building a team that represents a variety of backgrounds, perspectives, and skills. CMMB is proud to be an equal opportunity employer and complies with all applicable federal, state, and local fair employment practices laws including but not limited to applicable provisions of the Americans with Disabilities Act and the New York State Human Rights Law and New York City Human Rights Law, including the ban on salary history inquiries. CMMB will provide equal employment opportunity without regard to any of the above Protected Characteristics. Discrimination occurs when an employment decision is made, or an employment action is taken, on the basis of any of the above Protected Characteristics.

SCOPE

This policy applies to all areas of employment, including recruitment, hiring, training and development, promotion, transfer, termination, layoff, compensation, benefits, social and recreational programs, and all other conditions and privileges of employment in accordance with applicable federal, state, and local laws.

POLICY

CMMB will not discriminate against any qualified employee or job applicant with respect to any terms, privileges, or conditions of employment because of a person's physical or mental disability. CMMB also will make reasonable accommodations wherever necessary for all employees, directors, interns, volunteers or applicants with disabilities as required by law provided that the individual is otherwise qualified to safely perform the duties and assignments connected with the job and provided that any accommodations made do not pose an undue hardship on the

Organization. This policy is not intended to afford employees with any greater rights than those which already exist under state and federal law.

Any employees, directors, interns and volunteers including supervisors, involved in discriminatory practices will be subject to discipline up to and including immediate termination. CMMB will endeavor to make a reasonable accommodation of an otherwise qualified applicant or employee related to an individual's physical or mental disability; sincerely held religious beliefs and practices; and/or any other reason required by applicable law, unless doing so would impose an undue hardship upon the Organization's business operations.

Any applicant or employee who needs accommodation in order to perform the essential functions of the job should contact the Head of Human Resources to request such accommodation. The individual should specify what accommodation is needed to perform the job and submit supporting documentation explaining the basis for the requested accommodation, to the extent permitted and in accordance with applicable law. The Organization then will review and analyze the request, including engaging in an interactive process with the employee or applicant, to identify if such accommodation can be made. The Organization will evaluate requested accommodations, and as appropriate, identify other possible accommodations, if any. The individual will be notified of The Organization's decision regarding the request within a reasonable period. The Organization treats all medical information submitted as part of the accommodation process in a confidential manner.

Any employees with questions or concerns about equal employment opportunities in the workplace are encouraged to bring these issues to the attention of the Head of Human Resources. The Organization will not allow any form of retaliation against individuals who raise issues of equal employment opportunity. If employees feel they have been subjected to any such retaliation, they should contact the Head of Human Resources. To ensure our workplace is free of artificial barriers, violation of this policy including any improper retaliatory conduct will lead to discipline, up to and including discharge. All employees must cooperate with all investigations conducted pursuant to this policy.

b) **ANTI-HARASSMENT**

PURPOSE

CMMB committed to providing a work environment free of intentional and unintentional harassment, and that supports individual dignity and respect. These behaviors are unacceptable in the workplace and in any work-related settings such as business trips and Organization-sponsored social functions, regardless of whether the conduct is engaged in by a supervisor, co-worker, client, customer, vendor or other third party. The environment of CMMB should be characterized by mutual trust and the absence of intimidation, oppression, and exploitation. Through enforcement of this policy and by education of employees, CMMB will seek to prevent, correct, and discipline behavior that violates this policy.

SCOPE

All employees, regardless of their positions, are covered by and are expected to comply with this policy and to take appropriate measures to ensure that prohibited conduct does not occur. Appropriate disciplinary action will be taken against any employee who violates this policy. Based on the seriousness of the offense, disciplinary action may include verbal or written reprimand, suspension, or termination of employment.

Managers and supervisors who knowingly allow or tolerate discrimination, harassment or retaliation, including the failure to immediately report such misconduct to human resources (HR), are in violation of this policy and subject to discipline.

POLICY

CMMB will not tolerate harassment of any kind. Harassment may be characterized by the definition listed below, as well as inappropriate or unwelcome behavior that, if left unchecked, could become severe or pervasive as to constitute harassment.

Any employees, directors, interns and volunteers including supervisors, involved in harassment actions will be subject to discipline up to and including immediate termination.

DEFINITION OF HARASSMENT

Harassment generally is defined in this policy as unwelcome verbal, visual or physical conduct that denigrates or shows hostility or aversion toward an individual because of any actual or perceived protected characteristic or has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

Harassment can be verbal (including slurs, jokes, insults, epithets, gestures or teasing), visual (including offensive posters, symbols, cartoons, drawings, computer displays, text messages, social media posts or emails) or physical conduct (including physically threatening another, blocking someone's way, etc.). Such conduct violates this policy, even if it does not rise to the level of a violation of applicable federal, state or local laws. Because it is difficult to define unlawful harassment, employees are expected to behave at all times in a manner consistent with the intended purpose of this policy.

Sexual harassment is a form of sex discrimination and can include all the above actions. It is unlawful under federal, state, and (where applicable) local law. Sexual harassment, may further be defined as any sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature, because of an individual's sex, gender, sexual orientation, gender identity, self-identified or perceived sex, gender expression, and the status of being transgender when:

1. submission to such conduct is an explicit or implicit condition of employment;
2. submission to or rejection of such conduct is used as the basis for employment decisions; or
3. such conduct has the purpose or effect of:
 - a. unreasonably interfering with an individual's work performance, or
 - b. creating an intimidating, hostile or offensive work environment, even if the complaining individual is not the intended target of the sexual harassment.

Sexual harassment includes harassment against members of the same gender.

A sexually harassing hostile work environment includes, but is not limited to, words, signs, jokes, pranks, intimidation or physical violence which are of a sexual nature, or which are directed at an individual because of that individual's sex. Sexual harassment also consists of any unwanted verbal or physical advances, sexually explicit derogatory statements or sexually discriminatory remarks made by someone which are offensive or objectionable to the recipient, which cause the recipient discomfort or humiliation, or which interfere with the recipient's job performance.

Sexual harassment also occurs when a person in authority tries to trade job benefits for sexual favors. This can include hiring, promotion, continued employment or any other terms, conditions or privileges of employment. This is also called "quid pro quo" harassment.

Any employee, intern or volunteer who feels harassed should report the incident so that any violation of this policy can be corrected promptly. Any harassing conduct, even a single incident, can be addressed under this policy.

Other prohibited forms of harassment include conduct which is related to any of the above Protected Characteristics, which has the purpose or effect of:

- unreasonably interfering with an individual's work performance, or
- creating an intimidating, hostile or offensive work environment.

EXAMPLES OF SEXUAL HARASSMENT AND OTHER PROHIBITED CONDUCT

The following are examples of harassment prohibited by this policy:

- Unwanted sexual advances or propositions, or repeated unwelcome flirtations, such as:
 - Requests for sexual favors accompanied by implied or overt threats concerning the victim's job performance evaluation, a promotion or other job benefits or detriments; and
 - Subtle or obvious pressure for unwelcome dates or sexual activities.
 - Blocking normal movement.
- Physical contact of a sexual nature, such as:
 - Touching, patting, kissing, hugging, pinching, grabbing, or brushing against another person's body, or poking another person's body; and
 - Rape, sexual battery, molestation or attempts to commit these assaults.
- Whistling, staring, or leering at another person
- Questions or comments about another person's sexual activities, dating, personal or intimate relationships, or appearance.
- Conduct or remarks that are sexually suggestive, sexually oriented, or that demean or show hostility to a person because of that person's sexuality or sexual experience or other Protected Characteristic, including jokes, pranks, teasing, obscenities, obscene or rude gestures or noises, slurs, epithets, taunts, and other negative stereotyping, which create a hostile work environment.
- Addressing an individual with a term of endearment, nickname, or derogatory term on account of that individual's Protected Characteristic.
- Sex stereotyping occurs when conduct or personality traits are considered inappropriate simply because they may not conform to other people's ideas or perceptions about how individuals of a particular sex should act or look.
- Sexual or discriminatory display or circulation of publications anywhere in any form in the workplace, such as displaying pictures, posters, videos, objects, or written materials (including graffiti, cartoons, photographs, pinups, calendars, magazines, figurines, novelty items, promotional materials, reading materials, or other materials) that are sexually suggestive, explicit, pornographic, or that demean or show hostility to a person because of that person's Protected Characteristic. This includes sexual displays on workplace computers, cell phones, or tablets, and sharing such displays while in the workplace.
- Hostile actions taken against an individual because of that individual's sex, sexual orientation, gender identity and the status of being transgender, or any Protected Characteristic, such as:
 - Interfering with, destroying or damaging a person's workstation, tools or equipment, or otherwise interfering with the individual's ability to perform the job;
 - Sabotaging an individual's work; and
 - Bullying, yelling, name-calling.

- Notes, e-mails or voice mail, or such communications containing stereotypical or derogatory comments or characterizations regarding a person's Protected Characteristic.

*This contains only **examples** of prohibited conduct and does not purport to be all-inclusive.*

c) **COMPLAINT PROCEDURE FOR HARASSMENT OR DISCRIMINATION**

Responsibilities

CMMB will make every reasonable effort to ensure that our workplace is free from prohibited harassment and discrimination and will take appropriate corrective actions in instances where it learns such conduct has occurred. For CMMB to fulfill its obligations, all employees, interns, volunteers and board members have responsibilities.

Management will:

- Assure employees, directors, interns and volunteers that all forms of unlawful harassment and discrimination are expressly prohibited;
- Avoid engaging in the Prohibited Conduct detailed above;
- Avoid prohibited discrimination by making all decisions without regard to any Protected Characteristic; and
- Promptly and thoroughly investigate and take corrective action to stop any prohibited conduct.

Employees, interns and volunteers will:

- Avoid engaging in the Prohibited Conduct detailed above; and
- Inform Human Resources, Country Director or their immediate manager of any known instance of harassment or discrimination so that CMMB may promptly and thoroughly conduct an investigation. All reports of suspected harassment and/or discrimination should immediately be reported to Human Resources and Country Director in accordance with the Complaint Procedure set forth in this policy.

d) **COMPLAINT PROCEDURE - INTERNAL**

CMMB relies on and expects prompt reporting of all incidents of harassment or discrimination. If you believe that you have been subjected to such behavior, or if you have observed such behavior, you should promptly report the incident to your manager, Human Resources, your Country Director or any member of the CMMB Executive Team member. If you are uncomfortable reporting the incident through your line management, you may report it through the Compliance Hotline detailed in Section 4.A of the Code of Conduct.

Any manager or supervisor who receives a report or observes harassing or discriminatory conduct must report the conduct to Human Resources. A standard complaint form that may be used for reporting harassment or discrimination is included as Exhibit A. Complaint reporting may also be made verbally.

CMMB will promptly and thoroughly investigate every claim fairly and impartially, and any information or knowledge of suspected harassment and discrimination which may violate this policy, whether the information is submitted in verbal or written form. CMMB will also take corrective action to stop any conduct that it determines to be in violation of this policy. All employees, including managers and supervisors, are required to cooperate with any internal investigation of harassment or discrimination, and if they fail to do so are subject to discipline, up to and including termination.

Because of the sensitive nature of such allegations, investigations to gather all of the facts will be conducted with particular care and will remain confidential to the extent possible and in accordance with applicable law. Although CMMB cannot guarantee confidentiality, only individuals with a need to know will be privy to any particular matter.

In that regard, CMMB has a compelling interest in protecting the integrity of its investigations. CMMB has a strong desire to protect witnesses from harassment, intimidation and retaliation, to keep evidence from being destroyed, to ensure that testimony is not fabricated, and to prevent a cover-up. CMMB may decide in some circumstances that in order to achieve these objectives, employees, interns and volunteers must keep confidential the investigation itself and their role in it. If CMMB reasonably imposes such a requirement and employees, interns and volunteers do not maintain confidentiality, they may be subject to disciplinary action up to and including immediate termination.

All investigations will differ due to the varying nature of the allegations and the individuals involved. However, typical investigations will be conducted by the Human Resources Department and may include discussions with the parties involved, including any relevant witnesses, and review of all relevant documents, including all electronic communications. CMMB reserves the right to appoint an external independent investigator at its discretion.

e) **COMPLAINT PROCEDURE – EXTERNAL**

Harassment and discrimination are not only prohibited by CMMB, but is also prohibited by state, federal, and, where applicable, local law.

Aside from the internal process at CMMB, employees, interns and volunteers may also choose to pursue legal remedies with the following governmental entities at any time.

New York State Division of Human Rights (“DHR”): The New York Human Rights Law (“NYHRL”), codified as N.Y. Executive Law art. 15, § 290 et seq., applies to employers in New York State with regard to harassment or discrimination based on any Protected Characteristic and protects employees, paid or unpaid interns and non-employees regardless of immigration status. A complaint alleging violation of the NYHRL may be filed either with DHR or in the New York State Supreme Court.

Complaints with DHR may be filed any time within three (3) years of sexual harassment or within one (1) year of any other harassment. If an individual did not file at DHR, they can sue directly in state court under the NYHRL, within three years of the alleged harassment. An individual may not file with DHR if they have already filed a NYHRL complaint in state court.

Complaining internally to CMMB does not extend your time to file with DHR or in court. The one year or three years is counted from the date of the most recent incident of harassment.

You do not need an attorney to file a complaint with DHR, and there is no cost to file with DHR. DHR will investigate your complaint and determine whether there is probable cause to believe that sexual harassment has occurred. Probable cause cases are forwarded to a public hearing before an administrative law judge. If sexual harassment is found after a hearing, DHR has the power to award relief, which varies but may include requiring your employer to take action to stop the harassment, or redress the damage caused, including paying of monetary damages, attorney’s fees and civil fines.

DHR’s main office contact information is: NYS Division of Human Rights, One Fordham Plaza, Fourth Floor, Bronx, New York 10458; (718) 741-8400; www.dhr.ny.gov.

Contact DHR at (888) 392-3644 or visit dhr.ny.gov/complaint for more information about filing a complaint. The website has a complaint form that can be downloaded, filled out, notarized and mailed to DHR. The website also contains contact information for DHR’s regional offices across New York State.

Civil Rights Act of 1964, United States Equal Employment Opportunity Commission (EEOC): enforces federal anti-discrimination laws, including Title VII of the 1964 federal Civil Rights Act (codified as 42 U.S.C. § 2000e et seq.). An individual can file a complaint with the EEOC anytime within 300 days from the harassment. There is no cost to file a complaint with the EEOC. The EEOC will investigate the complaint and determine whether there is reasonable cause to believe that discrimination has occurred, at which point the EEOC will issue a Right to Sue letter permitting the individual to file a complaint in federal court.

The EEOC does not hold hearings or award relief but may take other action including pursuing cases in federal court on behalf of complaining parties. Federal courts may award remedies if discrimination is found to have occurred.

An employee, intern or volunteer alleging discrimination at work can file a "Charge of Discrimination." If an individual filed an administrative complaint with DHR, DHR will file the complaint with the EEOC to preserve the right to proceed in federal court. In general, private employers must have at least 15 employees to come within the jurisdiction of the EEOC.

An individual alleging discrimination at work can file a "Charge of Discrimination." The EEOC has district, area and field offices where complaints can be filed. Contact the EEOC by calling 1-800-669-4000 (TTY: 1-800-669-6820), visiting their website at www.eeoc.gov or via email at info@eeoc.gov.

If an individual filed an administrative complaint with DHR, DHR will file the complaint with the EEOC to preserve the right to proceed in federal court.

Local Protections: Many localities enforce laws protecting individuals from harassment or discrimination. An individual should contact the county, city or town in which they live or work to find out if such a law exists. For example, employees, interns and volunteers who work in New York City may file complaints of harassment or discrimination with the New York City Commission on Human Rights. Contact their main office at Law Enforcement Bureau of the NYC Commission on Human Rights, 40 Rector Street, 10th Floor, New York, New York; call 311 or (212) 306-7450; or visit <https://www1.nyc.gov/site/cchr/index.page>.

New York State Division of Human Rights Sexual Harassment Hotline: The New York State Division of Human Rights has established a toll-free confidential hotline to provide counsel and assistance to individuals who believe they may be experiencing workplace sexual harassment. Employees can call the toll-free sexual harassment hotline at 1-800-HARASS-3 Monday through Friday, 9:00 a.m. to 5:00 p.m.

Contact the Local Police Department: If the harassment involves unwanted physical touching, coerced physical confinement or coerced sex acts, the conduct may constitute a crime. Contact the local police department.

f) **DISCIPLINARY PROCEDURE**

In the event CMMB determines, in its sole discretion, that one of its employees, directors, interns, volunteers vendors, visitors, clients, or other individuals have engaged in conduct that violates this policy, CMMB, based upon a totality of the circumstances and an overall assessment of the seriousness of the violation, will take the action it deems in its discretion to be appropriate to ensure that harassment or discrimination does not recur, including, but not limited to: oral or written counseling, written warning, referral to specialized counseling, disciplinary suspension, transfer, probation, or termination.

Sexual harassment is offensive, is a violation of CMMB's policy, and subjects CMMB to liability for harm to victims of sexual harassment. Harassers may also be individually subject to liability. Employees of every level who engage in

sexual harassment, including managers and supervisors who engage in sexual harassment or who knowingly allow such behavior to continue, will be penalized for such misconduct.

Remember, CMMB cannot remedy claimed harassment (including sexual harassment) or retaliation unless individuals bring these claims to the attention of management. Please report any conduct that violates this policy.

g) **NO RETALIATION**

PURPOSE

CMMB does not tolerate such retaliation against anyone who, in good faith, complains or provides information about suspected unlawful harassment or discrimination. However, this retaliation provision does not protect persons making intentionally false charges of harassment or discrimination. Failure to participate fully and truthfully in the investigation also can result in disciplinary action, including termination. Unlawful retaliation consists of adverse employment actions against an employee, interns and volunteers in response to engaging in a protected act, such as reporting a complaint of harassment or participating in an investigation. Such retaliation is unlawful under federal, state, and (where applicable) local law.

SCOPE

This policy applies to all persons involved in CMMB operations and affairs, and prohibits retaliation by or against any employee, intern, volunteer, independent contractor, vendor, visitor or client of CMMB. Retaliation is prohibited at the workplace, at employer-sponsored events, and anywhere that work-related functions are performed.

POLICY

Retaliation in any form **against the following individuals** is unlawful, is strictly prohibited, and will itself be cause for appropriate disciplinary action, including termination:

- a complainant who exercises their right to make a complaint under this policy,
- a witness who participates in an investigation, or who testifies or assists in any proceeding under the NYHRL or other anti-discrimination law,
- a person who opposed sexual harassment by making a verbal or informal complaint to management, or by simply informing a supervisor or manager of harassment,
- a person who has reported that another employee, interns and volunteers has been sexually harassed, or
- a person that encouraged a fellow employee, interns and volunteers to report harassment.

Any employee, intern or volunteer with a question about this policy should contact Human Resources or the Director of Ethics and Compliance.

C. NON-DISCRIMINATION AGAINST PROGRAM PARTICIPANTS & BENEFICIARIES POLICY

PURPOSE

CMMB does not discriminate against any program participants and beneficiaries in the implementation of its programs. This includes discrimination, for example based on, race, color, religion, sex (including gender identity, sexual orientation, and pregnancy), national origin, disability, age, genetic information, marital status, parental status, political affiliation, veteran's status, or any other protected characteristic under applicable law.

SCOPE

This policy applies to all persons involved in CMMB operations and affairs.

POLICY

CMMB will not tolerate discrimination of any kind. CMMB will not discriminate and will take affirmative action measures to ensure against any discrimination.

Any employees, directors, interns and volunteers including supervisors, involved in discrimination actions will be subject to discipline up to and including immediate termination.

D. PROTECTION FROM SEXUAL EXPLOITATION, ABUSE AND HARASSMENT POLICY

PURPOSE

Value for human life, health and dignity is the core of CMMB's vision and existence. We believe that all forms of sexual exploitation, abuse, and harassment (SEAH) are a violation of human rights and an abuse of a position of power over a vulnerable population that CMMB has pledged to protect. SEAH can lead to serious, sometimes life-long, adverse consequences for the survivors, particularly child survivors.

CMMB is fully committed to protecting vulnerable population from sexual exploitation, abuse, and harassment (PSEAH). We fully adopt the Inter-Agency Standing Committee (IASC)'s Principals' Champion on SEAH and Sexual Harassment and puts in place adequate safeguards to protect and take appropriate action to tackle SEAH.

SCOPE

This policy is applicable to all CMMB employees who either work for or represent CMMB, regardless of whether s/he is compensated monetarily. This includes paid staff, volunteers, interns, board members, people recruited from the beneficiary population to do work for the CMMB [in return for additional rations or other benefits], including community volunteers and incentive workers.

POLICY

CMMB will not tolerate sexual exploitation or abuse of any kind. Sexual exploitation, abuse, or harassment is prohibited and every transgression will be acted upon.

CMMB does not tolerate any form of retaliation against anyone who, in good faith reports or provides information about suspected SEAH or sexual harassment. CMMB's Non-Retaliation policy protects individuals, including personnel (former and current), who report misconduct from any form of retaliation, such as adverse employment action (e.g., termination, compensation decreases, poor work assignments) for personnel and withdrawal of access to goods and services for beneficiaries.

Any employees, directors, interns and volunteers involved in sexual exploitation or abuse will be subject to discipline up to and including immediate termination. This policy extends to anyone connected to or involved in CMMB operations (such as vendors, partner organization staff, etc.) will be subjected to corrective action. Sexual exploitation or abuse may be characterized by the descriptions listed below.

a) **DEFINITION OF TERMS**

Sexual Exploitation "...means any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation of another."

Sexual Abuse "...the actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions."

Sexual Exploitation, Sexual Abuse, or Harassment (SEAH) occurs against a beneficiary or vulnerable member of the community.

Sexual Harassment occurs when there are power differentials between staff members are abused. Sexual Harassment is defined as any sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature.

Gender Based Violence (GBV) and Sexploitation, Abuse, or Harassment (SEAH): Gender-based violence (GBV) is violence that is perpetrated against someone because of his/her gender. Thus, SEAH can be seen as a type of GBV, as victims of SEAH are often abused because of their vulnerable status as women, girls, boys or even men [in some circumstances].

b) **PROTECTION FROM SEXUAL EXPLOITATION, ABUSE, AND HARASSMENT (PSEAH)**

The following major global standards form CMMB's Policy. Managers at all levels are responsible to internalize these policy standards, demonstrate commitment to PSEAH and create an environment that prioritizes and creates total accountability to the standards.

Inter-Agency Standing Committee's [IASC] Six Core Principles

1. Sexual exploitation and abuse by a CMMB employee constitute acts of gross misconduct and are therefore grounds for termination of employment.
2. Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is not a defense.
3. Exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior is prohibited. This includes exchange of assistance that is due to beneficiaries.
4. Any sexual relationship between CMMB employees regardless of their position and status and a person benefiting from CMMB's programs directly or indirectly and that involves improper use of rank or position is prohibited. Such relationships undermine the credibility and integrity of CMMB and the overall humanitarian aid work.
5. Where a CMMB employee develops concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether in the same agency or not, they must report such concerns immediately to the Country Director.
6. CMMB employees are obliged to create and maintain an environment which prevents sexual exploitation and abuse and promotes the implementation of the code of conduct. Managers at all levels have particular

responsibilities to support and develop systems which maintain an environment free from sexual exploitation, abuse, and harassment.

SEAH constitutes serious misconduct and therefore is grounds for disciplinary action including summary dismissal. CMMB has moral and legal obligations to report incidents of SEAH to appropriate authorities including its donors such as US Office of Inspector General and the United Nations.

CMMB is committed to pursuing a **survivor-centered approach** for responding to GBV, including SEAH. This approach seeks to empower survivors and promote their recovery by prioritizing their rights, needs and wishes. Key standards for applying this approach include:

- **Safety:** The safety and security of the survivor is the primary consideration.
- **Confidentiality:** Survivors have the right to choose to whom they will or will not tell their story, and information should only be shared with the informed consent of the survivor.
- **Respect:** Respect for the choices, wishes, rights, and dignity of the survivor should guide the decisions by organizations. The role of case managers is to provide the survivor with the information s/he needs to make informed decisions and to facilitate recovery.
- **Non-discrimination:** survivors should receive equal and fair treatment regardless of their age, gender, race, religion, nationality, ethnicity, sexual orientation, or any other characteristics.

Awareness Raising:

CMMB ensures that all CMMB personnel attend annual PSEAH awareness training session. The Head of HR at each CMMB location shall serve as the dedicated PSEAH focal person for their Country Office/location. Human Resources have the responsibility to ensure compliance with annual awareness raising training as well as integration of this policy provision in the HR management processes including recruitment, candidate reference check, new hire orientation and performance management processes. The head of HR will work with program staff in GBV/CP to promote awareness of CMMB's PSEAH policies with the communities it serves.

c) **REPORTING OF SEAH**

CMMB relies on and expects all employees to promptly report all allegations or concerns of Sexual Exploitation, Abuse, and Harassment (SEAH). Reporting mechanisms will also be developed at each of CMMB's Country Offices to encourage reporting of concerns by beneficiaries, partners, and other members of the community. In developing reporting mechanisms, CMMB follows the following core principles of effective reporting:

- **Safety:** reporting mechanisms to safeguard reporter, survivor, and alleged perpetrator. CMMB's Whistleblower policy, Human Resources, or Country Director are the preferred reporting mechanisms.
- **Confidentiality:** Reports of SEAH allegations are maintained in strict confidentiality and disclosed only on a need-to-know basis.
- **Transparency:** CMMB employees have a mandatory obligation to report SEAH. If SEAH allegation report is submitted by non-CMMB personnel, consent should be received from the reporter. The person receiving the complaint report is required to share CMMB's confidentiality policy explaining how, with whom and for what purpose the information will be shared. CMMB has an obligation to report confirmed SEAH allegations to responsible authorities including OIG, UN, and/or local law enforcement authorities.
- **Accessibility:** SEAH reporting mechanisms are developed to ensure easy access and locally appropriate methods.

The organizational Compliance Hotline Policy may be used for immediate and confidential reporting of SEAH concerns or allegations. You may also report an SEAH allegation or concern to your supervisor; if you are

uncomfortable reporting the incident to your supervisor you may report to the Human Resources Department, to your Country Director, the Director of Human Resources, or directly to CMMB's President and CEO. Any manager or supervisor who receives SEAH compliant report must immediately notify Human Resources, Country Director, or Director of Human Resources. Reports may be submitted verbally or in written form.

Failure to immediately report SEAH complaint by employee may result in discipline action up to and including termination of employment. In some situations, failure to report SEAH may result in further legal action.

d) **ASSISTANCE**

CMMB adopts survivor-centered and rights-based approach that supports the survivors to receive the protections and remedies they desire, need, and are entitled to. CMMB ensures that survivors of SEAH allegedly perpetrated by CMMB personnel receive immediate professional assistance, either with direct services or referral to relevant service providers. Written consent must be obtained prior to arranging assistance and referral service. In managing SEAH survivor assistance and referral, CMMB will take every precaution including provision of access to assistance, maintaining updated list of providers, following referral procedures, prioritizing the best interest of the child, survivor's confidentiality, and safety.

e) **INVESTIGATION PROCEDURE**

CMMB takes all SEAH allegations seriously and it will investigate the matter promptly. It will follow due process to protect the safety and rights of those involved including survivors, witnesses, and alleged perpetrators. Investigations shall be conducted based on a survivor-centered approach, respecting survivor's rights, safety, confidentiality, respect, and non-discrimination.

Upon receipt of SEAH report, the Director of Human Resources and the President and CEO will review the nature of the complaint and determine whether the investigation should be handled internally, or an experienced external investigator should be deployed. If the allegation is deemed to be referred to local law enforcement authorities, the survivor will be consulted immediately.

Assistance and referral will be provided to the survivor in compliance with the protocol outlined in section IV above. CMMB determines an appropriate course of personnel action to be taken against the alleged perpetrator (administrative leave, change of responsibilities) while the investigation is being completed.

Internal Investigation Procedure

The head of Human Resources or the Director of Ethics and Compliance will lead internal investigations. Depending on the case, additional members of the senior team may be called to form the internal investigation team. The internal investigation team is responsible for completing the investigation process in full confidentiality and maintaining appropriate documentation of the process and outcome of the investigation.

The internal investigation will present findings and recommendations to the President and CEO for final decision.

External Investigation Procedure

Depending on the nature of the SEAH complaint, CMMB may determine to deploy an external investigator who is qualified to handle cases that require a high degree of sensitivity and confidentiality. Clear terms of reference will be developed to enable CMMB to achieve legal and ethical standards of the investigation process. Where possible, the investigator should be well versed with the local laws, customs, culture, and language of witnesses to uphold quality and integrity of the process.

The outcomes of investigations will be made available to the survivor and the accused party. Based on the outcome, CMMB will make support available including psychosocial support.

In the event a SEAH complaint is substantiated, CMMB will take appropriate disciplinary action against the perpetrator based on organizational disciplinary procedures. The perpetrator's personnel files will be updated with the outcome of the investigation and will be shared with potential employers as part of the background check process. CMMB will report the finding of the investigation to relevant local law enforcement authorities.

f) **NO RETALIATION**

Retaliation consists of adverse conduct taken because an individual reported an actual or perceived violation of this policy or participated in an investigation. Retaliation in any form against the following individuals is unlawful, is strictly prohibited, and will itself be cause for appropriate disciplinary action, including termination:

- I. a complainant who exercises his or her right to make a complaint under this policy;
- II. a witness who participates in an investigation, or who testifies or assists in;
- III. a person who opposed sexual exploitation, abuse, or harassment by making a verbal or informal complaint to management, or by simply informing a supervisor or manager of SEAH;
- IV. a person who has reported SEAH or sexual harassment; or
- V. a person that encouraged another person or fellow employee to report SEAH or sexual harassment.

CMMB does not tolerate such retaliation against anyone who, in good faith complains or provides information about suspected SEAH. However, this retaliation provision does not protect persons making intentionally false charges of SEAH or misconduct. Failure to participate fully and truthfully in the investigation may also result in disciplinary action, including termination.

Any employee with a question about this policy should contact Human Resources or complete a submission via the compliance hotline. If the employee makes a complaint under this policy and has not received an initial response within five (5) business days, the employee should contact the Director of Compliance and Ethics or Human Resources.

E. CHILD SAFEGUARDING POLICY

PURPOSE

CMMB's vision is a world in which every human life is valued, and health and human dignity are shared by all. This vision includes children at the core because children can be extremely vulnerable in situations of poverty, humanitarian crisis and deserve higher standards of safeguarding and protection. CMMB works to create and maintain an organizational culture and operational environments which prevent and deter any actions and omissions, whether deliberate or inadvertent, that place children at the risk of any kind of child abuse.

This policy demonstrates CMMB's commitment to protect children from all harm and abuse, including sexual exploitation and abuse, physical abuse, emotional abuse and neglect. The policy and its accompanying implementation guidelines and toolkit have been developed to provide a practical guide to prevent child abuse and enhance child safeguarding within CMMB's work. They aim to create an open and aware environment where concerns for the safety and wellbeing of a child can be raised and managed in a fair and just manner, giving primacy to the best interests of the child. The responsibility for maintaining child safe environments is a shared responsibility of all those associated with CMMB's work, with the aim to translate the policy into the everyday culture and practice of our organization with regards to:

- **Prevention of Child Abuse:** Striving through raising awareness, good practice, training and safer recruitment to minimize the risks to children with whom we work or are in contact. All staff associated with CMMB are expected to abide by the Code of Conduct in relation to children.
- **Training to Promote Awareness of Child Safeguarding Obligations:** Ensuring that all those associated with CMMB's work are notified of and made aware that they are expected to comply with the policy.
- **Reporting of Child Abuse:** Ensuring that all those associated with the delivery of CMMB's work know their specific reporting responsibilities (including any mandatory reporting responsibilities in jurisdictions where these apply), the steps to take and whom to contact where concerns arise regarding the safeguarding of children. It is expected that all those associated with CMMB report any suspicion of children suffering harm.
- **Responding to Child Abuse:** Engaging in action that supports and protects children when concerns arise regarding their well-being; supporting those who raise such concerns; investigating or cooperating with any subsequent investigation; and taking appropriate corrective action to prevent the recurrence of such activity.

The CMMB Child Protection policy has been developed in line with International Standards relating to the *UN Convention on the Rights of the Child* and *A common approach to child protection for International NGOs*. These standards include the guidance that all NGOs working internationally should have a child protection policy if their direct or indirect beneficiaries include individuals under the age of 18.

Notably, CMMB employees, interns and volunteers come into contact with children aged below 18 years on a regular basis during their program/project and field/office activities. Besides being held accountable on the above international standards, CMMB's child safeguarding policy, procedures and practices will be informed by the legal framework applicable in the countries in which it operates.

As an organization that respects the rule of law and tenets of good practices, CMMB will aim to ensure that its staff and formal partners are aware of, and respond appropriately to, issues of child abuse and the sexual harassment and/or exploitation of children. This policy forms the basis by which CMMB will ensure that anyone who represents our organization behaves appropriately toward children and does NOT abuse the position of trust that comes with being a part of CMMB.

SCOPE

CMMB's Child Safeguarding policy applies to all CMMB employees, directors, interns, volunteers, consultants, and representatives of partner agencies who have a formal relationship with CMMB during and outside normal working hours.

POLICY

CMMB employees, directors, interns, volunteers, consultants and implementing partners are expected to promote and create a safe environment for children. Additionally, they are explicitly prohibited from engaging in any activity that may result in any kind of child abuse, including but not limited to the definitions listed below.

We will take proactive steps to prevent child abusers from becoming involved with CMMB's mission in any way and will not tolerate child abuse in any form. It is the responsibility of all those working on behalf of CMMB to raise any concerns they have or concerns which are reported to them according to this policy.

Creating a safe working environment at CMMB is ***everyone's responsibility*** and failure to act on concerns or disclosures relating to child abuse and exploitation is not an option. Ensuring a safe working environment extends beyond your office or team, our standards must be upheld by our partners and vendors. It is everyone's responsibility to ensure all partners and vendors receive a copy of our policy and agree to uphold its principles.

CMMB Senior Leadership and managers are accountable for this Policy and its implementation, and all employees are accountable for adherence to the policy. Managers are responsible for promoting awareness of this policy with the people they manage. Overall responsibility for identifying individuals who work with children and ensuring they receive appropriate levels of child safeguarding training commensurate with their role's risk profile lies with managers. Managers must prioritize child safeguarding awareness raising for themselves and their teams (including volunteers), contractors, partners working with them, and communities involved in CMMB programs and provide budget lines for such activities. Senior management teams should offer further support to help implement this Policy.

Managers at all levels have a particular responsibility to support and develop systems that create and maintain a safe working environment. This means beneficiaries and those working on behalf of CMMB know how CMMB expects them to behave, how they can raise complaints and concerns, and that CMMB will take action when they do. Program teams should consult partners, community members and beneficiaries to ensure this is done in an accessible and culturally appropriate way. Managers at all levels are also responsible for ensuring child safeguarding good practice with regard to risk management assessments of activities and implementation of corresponding mitigations to ensure child safety.

Country Office HR Staff should adapt child safeguarding policies and practices to local contexts in collaboration with program staff. They should work with managers to undertake child safe recruitment and screening and volunteer checks (or where not available utilize other procedures such as statutory declarations).

All individuals associated with the delivery of CMMB's work must:

- Familiarize themselves with CMMB's Child Safeguarding policy and standards
- Conduct themselves in a manner consistent with CMMB's values and the Child Safeguarding Policy
- Treat all children with respect regardless of their race, color, gender, language, religion, opinions, nationality, ethnicity, social origin, property, disability, sexual orientation or other status

- Immediately disclose all charges, convictions, and other outcomes of an offense that they are/were subject to and relates to child exploitation and abuse, including those under traditional law, which occurred before or occurs during association with CMMB
- Never use language or behavior towards children that is inappropriate, harassing, abusive, sexually provocative, intended to humiliate or culturally inappropriate
- Never engage children in any form of sexual intercourse or sexual activity including paying for sexual services or engaging in other transactional forms of sexual services with any person under 18 years old (or under the local age of consent where higher than 18)
- Never engage in any sort of child abuse whether sexual, physical, emotional, neglect, grooming, harassment or exploitation via digital or other means
- Never engage in family violence which can include (but is not limited to) female genital mutilation, child marriage, trafficking and child labor
- Wherever possible, ensure that another adult is present when working near children
- Not sleep close to unsupervised children unless absolutely necessary however where necessary, immediately report this to your Manager and if possible, make sure another adult is present (noting that this does not apply to your own children or in cases when you are acting as a guardian)
- In the capacity of your engagement with CMMB, not visit a child's home alone or invite unaccompanied children into your own home or accommodation, unless they are at immediate risk of injury or in physical danger
- Comply with all relevant legislation, including labor laws in relation to child labor
- Not use physical or humiliating punishment on children
- Not consume alcohol or illicit drugs when working with or in contact with children
- Not discriminate against or act in favor of particular children to the exclusion of others
- Not seek to make contact or spend time with any child connected with CMMB programs or activities outside of the designated program or activity time
- Not abuse your position to withhold professional assistance, or give preferential treatment, gifts or payment of any kind to a child, or another person in relation to a child in order to solicit any form of advantage or sexual favor from a child.
- Not engage in physical contact with a child that is: unprofessional, abusive, unnecessary or excessive, that makes a child feel uncomfortable or unsafe, or in a culturally insensitive way (necessary physical contact would include attending to an injured child or removing a child from a dangerous situation).
- Not engage in child labor including hiring of children for domestic or other labor: which is inappropriate given their age or developmental stage, which interferes with their time available for education and recreational activities, or which places them at significant risk of injury
- Not do things for children involved in CMMB programs, activities or events of a personal nature that they can do for themselves such as toileting, bathing or changing their clothes
- Not use any computers, mobile phones, video cameras, cameras or social media to exploit or harass children, or access child sexual exploitation material through any medium
- Not condone or participate in behavior with children which is illegal, unsafe or abusive
- Immediately report concerns for the safety or wellbeing of a child, or a possible breach of the Child Safeguarding Policy in accordance with the Child Safeguarding Reporting Procedures
- Speak with Management about any concerns you have for your involvement in any situation where your words, actions or behavior may be interpreted as a breach of this Policy
- Act professionally towards children with whom you interact, whilst at the same time showing genuine care and compassion
- To ensure the privacy and safeguarding of children when photographing or filming a child or using children's images or stories for work-related purposes including promotion, fundraising and development education:

- Take care to ensure local traditions or restrictions for reproducing personal images are adhered to before photographing or filming a child;
- Obtain informed consent from the child and/or parent or guardian of the child before photographing or filming a child or obtaining their story. An explanation of how the photograph, film or story will be used must be provided;
- Ensure photographs and videos present children in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive;
- Ensure images and stories are honest representations of the context and the facts;
- Ensure file labels, meta data or text descriptions do not reveal identifying information about a child when sending images electronically or publishing images or stories in any form.

If an allegation is made against you, then you must inform your manager immediately. You should create a signed and dated record of the details as you know them. All subjects of complaint will be treated with respect and all allegations will be treated confidentially.

The Director of Human Resources and Director of Ethics and Compliance are responsible for reviewing and updating this Policy in line with legislative and organizational developments and hold overall accountability for CMMB's Safeguarding work.

DEFINITIONS OF TERMS RELATED TO CHILD SAFEGUARDING/PROTECTION

A child is defined as anyone under the age of 18 years.

Abuse: A deliberate act of ill treatment that can harm, or is likely to cause harm to, a child's safety, well-being, dignity and development into adulthood. Abuse includes all forms of physical, sexual, psychological or emotional ill-treatment. It also includes anything individuals, institutions or processes do, or fail to do, which directly or indirectly harms children or damages their prospects of self and healthy development into adulthood.

Sexual exploitation and harassment mean any actual or attempted abuse of a person in a position of vulnerability, differential power, or trust, for sexual purposes including, but not limited to, profiting monetarily, socially or politically from the sexual exploitation and/or harassment of another.

Safeguarding/Protection: Measures and structures to prevent and respond to abuse affecting children. It includes a set of policies, procedures and practices that we employ to ensure that CMMB itself is a child-safe environment.

CMMB CHILD SAFEGUARDING PRINCIPLES

CMMB Child Safeguarding Policy and practices are guided by the following principles:

- a) **Best interests of the child:** In all actions concerning children and when dealing with a concern for the safety or wellbeing of a child, the best interests of the child shall be our primary consideration.
- b) **Zero tolerance of child abuse and exploitation:** CMMB has a zero-tolerance approach to child abuse and exploitation. This is enacted via robust prevention and response work, offering support to survivors and holding those responsible for harm and intolerable behavior to account. CMMB will ensure all those associated with the delivery of our work have access to information about how to report concerns or allegations of child exploitation, abuse or other breaches of this policy and will take immediate action upon report of any suspected breach.

CMMB will not knowingly engage personnel to be in direct or indirect contact with children or access communities whom we work with if they pose a risk to children's safety or wellbeing.

- c) **Shared responsibility:** CMMB believes child safeguarding is a shared responsibility, meaning that successful implementation of child safeguarding measures is reliant on all those associated with the delivery of our work having access to this policy and guidance for its best-practice implementation; knowing and understanding their responsibilities and commitment to upholding child safeguarding principles. CMMB will ensure all those who work on behalf of the organization with children and vulnerable populations will receive training in relation to Child Safeguarding. This training will be carried out on a regular basis. CMMB will also ensure that all partner organizations involved in the delivery of our work have appropriate child safeguarding measures to implement the minimum standards outlined in this Policy.
- d) **Risk management approach:** CMMB has a duty of care to provide protective environments for children in all operations and activities. CMMB will act with intention and foresight to ensure child safeguarding risks are identified, monitored and mitigated in the assessment of its operations - to prevent the risk of a child being abused, exploited or harmed. A risk management approach does not diminish the fact CMMB has a zero-tolerance approach to breaches of this policy. It is expected that child safeguarding will be considered when planning a program as well as during.
- e) **Accountability and Openness:** CMMB will continue to strengthen its child safeguarding systems to ensure accountability to children, their families and the communities in which it works. Specific child safeguarding roles and responsibilities will be delegated to staff to effectively embed child- safe organizational practice across all programs, operations and activities. CMMB will ensure an organizational child- safe culture which is transparent about safeguarding issues occurring within CMMB, in line with privacy regulations and within legal frameworks and where any issues or concerns of child safeguarding or poor practice can be raised and discussed.
- f) **Confidentiality:** CMMB is committed to confidentiality in sharing sensitive information in relation to child safeguarding incidents reported to us. Information that identifies individuals will only be shared with due consideration to the safety of the child, witnesses or subject of complaint, or to protect the integrity of an investigation.
- g) **Commitment to good practice:** CMMB commits to creating and maintaining a safe organizational culture where all those whom CMMB serves and who work for CMMB feel empowered to insist on non- discriminatory and respectful behavior from each other, where poor behavior is not accepted, and where power is not abused. The safeguarding of children within CMMB's work is all of our responsibility and must be considered in every aspect of our work. A commitment to good practice is expected of all CMMB's employees.

BREACHES OF THE CHILD SAFEGUARDING POLICY

Breaches of this Policy will not be tolerated and may result in disciplinary procedures, including termination of employment.

CMMB will take action against anyone, whether they are the subject of a complaint or not, who seek or carry out retaliatory action (such as but not limited to harassment, intimidation, unfair disciplinary action or victimization) against complainants, survivors or other witnesses. Employees who are found to do this will be subject to disciplinary action, up to and including termination of employment.

If a CMMB employee is found to have made an allegation that they knew to be false they will be subject to disciplinary action, up to and including termination of employment.

REPORTING

a) Externally Facing Reporting Information

- On all CMMB websites, information on how to access CMMB's Compliance Hotline will be provided for the public, communities and partners on how to raise a concern or complaint.
- CMMB offices will post visible information on complaint mechanisms.
- CMMB requires its sub-grantees to have similar communication and reporting procedures.

b) Child Friendly Reporting Information and Processes

- CMMB provides safe environments to enable children to speak up about abuse or violence against them.
- CMMB seeks activities to enhance child safety and create an environment where their voices are heard.

c) How to Raise a Complaint or Concern

- Anyone (including CMMB's beneficiaries) can raise a concern or make a complaint to CMMB about something they have experienced or witnessed without fear of retribution.
- Complaints or concerns may be reported verbally or in writing to Country Director, SVP of Programs and Volunteers, Human Resources, Director of Ethics and Compliance or using the whistleblowing reporting system.
- CMMB's Compliance Hotline (outlined in Section 4.A.) is available to all CMMB staff and external contacts.
- Employees may also raise concerns with their Line Manager or Human Resources.

d) Requirement of proof

- CMMB does not expect all those associated with the delivery of its work to be child safeguarding experts or to have conclusive facts before making a report.
- People are required to report any knowledge or concern, founded or otherwise, that they may have of a child safeguarding incident occurring.
- Those with knowledge or suspicions should not gather evidence, speak to other colleagues or the child involved, or investigate the incident themselves.

e) Confidentiality, Safety and Wellbeing

- The well-being of the child is always of paramount importance. CMMB is committed to the confidentiality, safety and wellbeing of all involved in any report of a child safeguarding incident, including the individuals who have reported the incident and the individual against whom the allegation is made. When responding to allegations, CMMB will ensure all those involved are treated fairly, and that the rights of each individual are respected during an investigation and any applicable disciplinary process. Confidentiality must be maintained throughout the complaints process by all involved. Employees who breach confidentiality will be subject to disciplinary action up to and including termination of employment. In some cases, such breaches constitute breaking the law.

SUPPORT FOR CHILDREN WHO HAVE SUFFERED HARM

CMMB Program teams will offer support to children who have suffered harm abuse or exploitation, regardless of whether a formal internal response is carried out (such as an internal investigation). Support can include psycho-social counselling or access to other appropriate support as needed. Children can choose if and when they would like to take up the support options available to them. CMMB will strive to provide support that is sensitive and responsive to the child's needs.

F. TRAFFICKING IN PERSONS POLICY

PURPOSE

CMMB and the United States Government prohibit trafficking in persons. CMMB is committed to a work environment that is free from human trafficking and slavery, which for purposes of this policy includes forced labor and unlawful child labor. CMMB will not tolerate or condone human trafficking or slavery in any part of our global organization.

CMMB employees, subsidiaries, contractors, subcontractors, vendors, suppliers, partners and others through whom CMMB conducts business must avoid complicity in any practice that constitutes trafficking in persons or slavery.

SCOPE

CMMB's Trafficking in Persons (TIP) policy applies to all CMMB employees, directors, interns, volunteers, consultants, and representatives of partner agencies who have a formal relationship with CMMB during and outside normal working hours.

Every employee is responsible for reading, understanding and complying with this policy. CMMB managers are responsible for ensuring that employees who report to them, directly or indirectly, comply with this policy and complete any certification or training required of them. If you have any questions or concerns relating to this policy, consult the CMMB NY Human Resources department.

POLICY

CMMB will not tolerate human trafficking of any kind. Trafficking may be characterized by the activities listed below.

Any employees, directors, interns and volunteers including supervisors, involved in trafficking actions will be subject to discipline up to and including immediate termination.

DESCRIPTION OF TRAFFICKING

Human Trafficking, also known as trafficking in persons, involves the recruitment, transportation, transfer, harboring, or receipt of persons through force, fraud, or coercion for the purposes of exploitation in forced labor or commercial sexual exploitation. Trafficking includes, but is not limited to, the following activities:

- Engaging in any form of trafficking in persons.
- Procuring commercial sex acts.
- Using forced labor in the performance of any work.
- Destroying, concealing, confiscating, or otherwise denying access by an employee to the employee's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority.
- Using misleading or fraudulent practices during the recruitment of employees or offering of employment/contract positions, such as failing to disclose, in a format and language understood by the employee or applicant, basic information; or making material misrepresentations during the recruitment of employees regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, the living conditions, housing, and associated costs (if provided by the employer or agent), any significant cost to be charged to the employee or applicant, and, if applicable, the hazardous nature of the work.

- Using recruiters that do not comply with local labor laws of the country in which the recruiting takes place.
- Charging applicants recruitment fees.
- If required by law or contract, failing to provide return transportation or failing to pay for the cost of return transportation upon the end of employment.
- If required by law or contract, failing to provide or arrange housing that meets the host country's housing and safety standards.
- If required by law or contract, failing to provide an employment contract, recruitment agreement, or other required work document in writing with legally required information and in a language the employee understands.

G. FRAUD, WASTE, AND ABUSE POLICY

PURPOSE

CMMB is committed to the responsible stewardship of our resources, and maintaining a comprehensive plan for detecting, preventing, and correcting fraud, waste, and abuse. To that end, CMMB expects any individual who is aware of, or suspects acts of fraud, waste or abuse of CMMB resources to report such acts to your supervisor, the Director of Ethics and Compliance, or through the Compliance Hotline outlined above in Section 4.A. CMMB has zero tolerance for the commission or concealment of acts of fraud, waste, or abuse.

SCOPE

CMMB's Fraud, Waste, and Abuse policy applies to all CMMB employees, directors, interns, volunteers, consultants, and representatives of partner agencies who have a formal relationship with CMMB during and outside normal working hours.

POLICY

CMMB will not tolerate any acts of fraud, waste, or abuse of CMMB resources. Fraud, waste, and abuse is characterized by the definitions listed below.

Any employees, directors, interns, and volunteers including supervisors, involved in fraud, waste, or abuse of resources will be subject to discipline up to and including immediate termination. Anyone who witnesses or suspects an act of fraud, waste, or abuse has occurred, is expected to report the concern to your supervisor, the Director of Ethics and Compliance, or through the Compliance Hotline outlined above in Section 4.A and failure to do so may be considered an act of concealment and subject to disciplinary actions.

DEFINITIONS

Fraud – An intentional misrepresentation or deception, usually in the form of a false statement, to obtain money or some other unauthorized personal benefit by deliberate deception to the detriment of another party, organization, or entity. Fraud is an act that is committed knowingly, willfully, recklessly, or intentionally.

Waste – Incurring unnecessary costs as a result of deficient management practices, systems or controls; the over-utilization of services (not caused by criminally negligent actions) and the misuse of resources.

Abuse – Incidents or practices that either directly or indirectly result in unnecessary costs to CMMB, its programs, or another entity. Abuse can also occur with excessive charges, improper billing practices, payment for services that do not meet required specifications or standards and payment for unnecessary services. Abuse can occur in financial or non-financial settings.

Examples of fraud, waste and abuse activities include, but are not limited to:

- Forgery or alteration of documents (checks, contracts, purchase orders, invoices, time sheets, leave records, etc.).
- Misrepresentation of information on documents (employment history, time sheets, leave records, travel reimbursement requests, financial records, etc.).
- Theft, unauthorized removal, or willful destruction of CMMB records, property, or the property of other persons (to include the property of employees, customers, or visitors).
- Theft or misappropriation of funds, equipment, supplies, or any other asset.
- Improprieties in the handling and reporting of financial transactions.

- Serious abuse of CMMB time such as unauthorized time away from work or falsification of work hours reported.
- Authorizing or receiving payments for goods not received or services not performed.
- Vendor kickbacks.
- Misuse of authority for personal gain.
- Any computer-related activity involving the alteration, destruction, forgery, or manipulation of data for fraudulent purposes.
- Inappropriate use of CMMB-provided electronic devices such as computers, tablets, cell phones or email.
- Falsification of reports to management or external agencies

H. ANTI-NEPOTISM POLICY

PURPOSE

The purpose of this policy is to avoid favoritism, the appearance of or potential for favoritism, and conflicts of interest and loyalty often associated with nepotism. CMMB prefers to avoid bringing family relationships into the workplace whenever possible. Yet, occasionally, more than one family member may work for CMMB. Nepotism is inconsistent with the CMMB's human resource practice of making employment decisions and other business decisions based solely on individual qualifications, skills, ability and performance.

SCOPE

This policy applies to all CMMB employees, directors, interns, volunteers, consultants or otherwise personnel involved in hiring processes. For the purpose of this policy, the term family member includes individuals related more closely than second cousins by blood or marriage or unrelated persons sharing the same household.

POLICY

No CMMB employee or director may make, participate in, or attempt to influence employment or other business decisions involving a relative or pressure or cause others to do so. Therefore, there can be no direct reporting or supervisory relationship between relatives, and all "employment decisions" must be made by others.

If an individual is to be assigned to a position that is under the supervision or control of a relative who has or may have a direct effect on the individual's progress or performance, or an individual is to be assigned to a position with the same immediate supervisor as a relative, a management plan must be devised and approved by the head of the organizational unit and the Human Resources department.

J. POLITICAL ACTIVITY POLICY

PURPOSE

CMMB supports the rights of employees to exercise their personal political rights and to engage in the democratic political process. However, CMMB's activities require it to be non-political, and employees must ensure that they do not represent themselves as CMMB representatives when engaging in politics. CMMB does not contribute anything of value, including employee's work time, to political campaigns.

SCOPE

This policy applies to all persons involved in CMMB operations and affairs.

POLICY

Any individual political activity must take place outside of working hours and outside CMMB's offices. Use of CMMB properties for publishing or distributing materials on behalf of any candidate or party, or engaging in any other activity which may be considered CMMB support for, or opposition to, any candidate is prohibited.

Furthermore, any CMMB employee who chooses to make a bid for public office will be asked to take a leave of absence during that process. If an employee is elected to full-time position in office, their employment will be terminated in accordance with CMMB's Conflict of Interest policy.

On occasion, senior leaders of the organization may have to engage in US government defined 'lobbying activities' to specifically to promote the overall mission of the organization. The individuals holding roles where these activities are required will be provided with the CMMB Lobbying Policy and must abide by its guidelines, and such activities will be documented in timesheets according to the Lobbying Policy. For any questions regarding the CMMB Lobbying Policy, please contact the Director of Ethics and Compliance.

I. ANTI-CORRUPTION POLICY

PURPOSE

As a US-based organization, CMMB must follow the US federal laws as well as the laws governing the regions of our operations. Our approach to anti-corruption is consistent with the U.S. Foreign Corrupt Practices Act (FCPA) and country-specific anti-bribery laws.

SCOPE

This policy applies to all persons involved in CMMB operations and affairs.

POLICY

CMMB employees must not offer, promise, make, authorize or provide, directly or indirectly through third parties, any payments, gifts, or anything of value to any government official, including family members of the official, and former officials, in order to influence or reward their actions or decisions in connection with their official capacity for the purpose of obtaining or retaining business or securing an improper advantage. In addition, employees must not act in any way that might cause a reasonable person to believe that CMMB is providing an improper benefit to government officials.

When doing business with government representatives, employees must consult with their Managers, the Country Director and Human Resources to be certain that they are aware of any special rules that apply and obtain approval before providing anything of value to a government official.

K. DUTY OF CARE POLICY

PURPOSE

It is important that employees, interns and volunteers understand the steps taken by CMMB to meet the obligations of Duty of Care for CMMB staff members. CMMB's Duty of Care responsibilities include health, safety and security at the workplace, especially during international travel and transfers. CMMB has taken specific action to enhance the health, safety and security procedures for employees, interns and volunteers required to travel to and live-in challenging environments.

SCOPE

This policy applies to all persons involved in CMMB operations and affairs traveling overseas.

POLICY

Prior to all international travel it is advisable that you have an informal safety and security briefing with the Country Director or upon arrival when in country. You must read and follow the country safety and security plan, where available from the relevant Country Directors prior to departure.

TRAVELER SUPPORT SERVICES

In order to strengthen overall awareness and preparedness, CMMB has engaged traveler support services. Please consult Human Resources prior to your trip to receive a full briefing on all available travel support services.

Threatening Situations: Hijacking or Hostage Emergencies

While every hostage situation is different, there are some general considerations to keep in mind. The U.S. government's policy is firm: The U.S. does not make concessions with terrorists. CMMB leadership will collaborate with U.S. and foreign government to obtain the release of staff under duress. When U.S. citizens are abducted overseas, the U.S. looks to the host government to exercise its responsibility under international law to protect all persons within its territories and bring about the safe release of hostages. The U.S. works closely with these governments from the outset of a hostage-taking incident to ensure that its citizens and other victims are released as quickly and safely as possible. CMMB will immediately establish a crisis-management team to urgently seek the release of staff members. This would be done in cooperation with the police and any other appropriate authorities. The safe return of staff will be a priority and all reasonable efforts will be made to achieve the release of CMMB employees.

L. TECHNOLOGY-RELATED POLICIES AND STANDARDS

a) **ACCEPTABLE USE POLICY GUIDANCE**

CMMB grants its employees, interns and volunteers and other authorized users, access to its information technology resources, as defined below, for the purposes of conducting and facilitating its business. CMMB's information technology resources, and all communications, documents, files, records or other materials sent, received, reviewed, stored and/or created by employees, interns and volunteers while using its information technology resources, are solely the property of CMMB.

The below language is a general guide to the Acceptable Use Policy. The Acceptable Use Policy is maintained by the CMMB NY Information Technology department. For exact language, please reference document, ITS 002 - Acceptable Use Policy, and for any IT use-related questions, please contact CMMB NY, Director of IT.

The Acceptable Use Policy explains the rules governing the appropriate access and use of the information technology resources and sets forth CMMB's rights to access, review and/or otherwise monitor all information technology resources, communications, and/or documents created by its employees, interns and volunteers while using its information technology resources, or as otherwise set forth herein, regardless of where the employee is situated (i.e., on-site or at a satellite office, home office or other remote location).

For purposes of this policy, the term "information technology resources" shall include, without limitation: electronic mail (e-mail), voicemail, Internet-based communication services, text messages, chat messages, electronic archives, social media communications, and any other communications system or service, including CMMB-provided accounts and personal Web-based accounts that are accessed or used through either (i) CMMB-provided electronic networks, electronic devices, computer equipment and hardware, telecommunication networks, or telecommunications equipment licensed, owned, leased, or provided by or to CMMB (however structured, including wireless) (e.g., servers, computers, software, software accessories, stored data and files, storage devices (including flash or thumb drives), laptops, handheld computers, PDAs, iPads, tablets, mobile messaging and other telephones, voicemail systems, web pages, Internet, Intranet, peripheral devices, and any data and information contained or processed thereon or on cloud-based tools); or (ii) similar personal systems or equipment when such systems either are connected (including wirelessly) to CMMB's information technology resources or used to conduct CMMB business.

ACCESS TO, AND MONITORING OF, EMPLOYEE COMMUNICATIONS

You should not have any expectation of privacy while using the information technology resources, whether working at the office or via remote access. This includes, but is not limited to, communications on the information technology resources with any attorney, accountant, medical professional, or any other person/entity while using information technology resources. This also includes communications sent or received via personal e-mail accounts (e.g., Yahoo, gmail, i-cloud, etc.) and use of personal social media, even if they are password protected, subject to applicable federal, state or local law. The information technology resources, and all communications and documents sent, received, stored, reviewed and/or created by employees, interns or volunteers, while using the information technology resources are solely the property of CMMB. CMMB, as permitted by law, intends to, and will, exercise its right to access, review, audit, intercept, copy, read and/or otherwise monitor any and all employee, interns, or volunteers' communications and documents sent, received, reviewed, stored and/or created by employees in their use of the information technology resources at any time to ensure that the information technology resources are being used in compliance with the law, this policy and other company policies. Employees, interns and volunteers should be aware that their activities and the contents of their communications (including, for example, e-mails sent or received on personal e-mail accounts, even if password protected) made on the information technology resources may be stored on a hard drive and can be forensically retrieved and reviewed by CMMB. Employees, interns, or volunteers acknowledge that CMMB has a legitimate business interest in restricting personal usage and monitoring users' activities and communications on the information technology resources, including protecting CMMB's assets and

reputation, promoting employee productivity and ensuring compliance with the law and CMMB's legitimate corporate policies. The Organization may store electronic communications for a period of time after the communication is created. From time to time, copies of communications may be deleted.

PROHIBITED ACTIVITIES AND RESTRICTIONS ON USE

You shall use the information technology resources only as authorized by CMMB, for the purpose of conducting and facilitating CMMB business. CMMB will not tolerate the use of the information technology resources in any improper manner or for any purpose that is not authorized by CMMB. You are strictly prohibited from using the information technology resources in connection with any of the following activities:

- a) Accessing, viewing, displaying or sending any communications or documents with illegal, fraudulent, discriminatory, harassing, derogatory, threatening, obscene or pornographic content;
- b) Accessing, viewing, displaying or sending any communications or documents that would violate CMMB's Policy Prohibiting Workplace Harassment and Discrimination (the "Non-Discrimination/Harassment Policy"), including but not limited to: sexually explicit communications or documents and any communications or documents that may be construed as offensive, derogatory or discriminatory to any individual or group based upon any Protected Characteristic as defined in the Non-Discrimination/Harassment Policy;
- c) Accessing, viewing, displaying or sending any communications that are violent in nature;
- d) Accessing or downloading sites that involve gambling activities;
- e) Sending any confidential or proprietary information (as defined by CMMB's Confidential Information policy) of CMMB to any other employee or third party, except to carry out CMMB's business consistent with the employee's job responsibilities;
- f) Copying or downloading documents or computer software in violation of copyright or trademark laws or contractual requirements;
- g) Sending any communications that represent the sender as someone else or using someone else's password or log-ins without prior authorization;
- h) The operation of a private business;
- i) Transmitting or posting any material in violation of federal, state or other privacy laws;
- j) Using CMMB-provided email addresses to register for personal email subscriptions, fantasy sports teams, or other similar publications or notifications, or for personal banking, mortgages, billing notifications and other services. The sharing of CMMB-provided email addresses makes CMMB susceptible for phishing attempts, spam and other security breaches; or
- k) Downloading for business or personal use (except as specifically authorized by CMMB) any software, including without limitation file-sharing ("peer-to-peer") software (such as Limewire, BitTorrent or others) or any form of computer programs, utilities, music, videos, screensavers or executable files.

You are responsible for all activity that occurs in your use of the information technology resources. You must be always careful not to use the information technology resources in a manner that is likely to cause network congestion or significantly hamper the ability of others to access and use the information technology resources.

Software cannot be downloaded from the Internet onto CMMB's computers without prior authorization. All requests to download software should be forwarded to CMMB's IT Administrator. In cases where downloading is approved, the software must be scanned for viruses using CMMB's approved virus scanning programs and procedures before it can be opened or loaded onto any computer.

As described in the Access Management Policy, you should safeguard the passwords that are provided to you (or which you create) for use of the information technology resources. These passwords are provided to protect information that is sent electronically from people or entities outside of CMMB. You are required to provide CMMB with any access codes or passwords applicable to the information technology resources so that CMMB can monitor your use of information technology resources as described in the Access Management Policy. For exact password management guidance, please reference section 5.4 in the Access Management Policy or contact the CMMB NY IT.

Departing employees should not delete any electronic communications before departing from CMMB.

PERSONAL USE

The information technology resources are to be used by you primarily to conduct CMMB business. Incidental use of the information technology resources for personal use by employees is permitted so long as such personal use: (i) is infrequent in nature; (ii) is not done during working hours; (iii) does not interfere with your work or the work of other employees; and (iv) is consistent with IT policies and all other policies of CMMB. Even communications made for personal use are subject to review and monitoring in accordance with this policy. As such, you should have no expectation of privacy when using the information technology resources even for personal communications, including but not limited to personal e-mails that are sent or received on private, Web-based, password-protected e-mail accounts (e.g., Yahoo!, G-Mail, etc.), or personal social media usage (e.g., Facebook).

CMMB assumes no liability for loss, damage, destruction, alteration, disclosure or misuse of any personal data or communications transmitted over or stored on the information technology resources.

VIOLATIONS OF IT POLICIES AND STANDARDS

In the event CMMB determines, in its sole discretion, that you are using the information technology resources in violation of any IT policy, CMMB will take prompt disciplinary action, including but not limited to immediate termination of employment. In any instance where CMMB suspects potentially illegal activity, it also will immediately report such activity to the appropriate legal authorities.

b) SOCIAL MEDIA GUIDANCE

PURPOSE

Use of social media is an increasingly widespread phenomenon for both personal and professional activities. However, use of social media also presents certain risks and carries with it distinct responsibilities. To assist you in making responsible decisions about your use of social media, CMMB has established these guidelines for appropriate business and personal use of social media.

DEFINITION OF SOCIAL MEDIA

"Social media" are online technologies and applications, all of which you should assume can be tracked or traced, which allow users to share news, opinions, photos and videos. Social media includes all means of communicating or posting

information or content of any sort on the Internet, including a web log or blog, journal or diary, personal web site, social networking or affinity web sites such as Facebook and Instagram; professional networks such as LinkedIn; live blogging tools such as Twitter, and new applications that are created daily.

GUIDELINES FOR USING SOCIAL MEDIA:

Be responsible. You are personally accountable for everything you do online. Think before you post and be responsible for all of the information you put online.

Follow the CMMB's policies and guidelines when using social media. Follow them in any use of social media that relates to CMMB in any way, including but not limited to the following policies: Anti-Harassment/Discrimination/EEO Policy and Complaint Procedure, Conflict of Interest, Confidential Information and Electronic Communication Systems Policy.

Be transparent. If you discuss CMMB-related matters in a personal posting, you must state that you are an employee of CMMB. In addition, you must state you are speaking on your own behalf, and not on behalf of CMMB, by including a disclaimer that is similar to the following: "This post is your own and does not necessarily represent the views of Catholic Medical Mission Board." Despite such a disclaimer, CMMB staff must always consider whether their personal postings may be misunderstood as expressing an official CMMB position.

Get authorization to make official postings on behalf of CMMB. Only authorized employees are permitted to participate in social media on behalf of the CMMB.

Protect confidential information. Do not disclose any trade secret, intellectual property or other proprietary or business-sensitive information of CMMB or others with whom we do business. Trade secrets may include information regarding the development of systems, processes, products, know-how, and technology. Further, do not disclose internal reports, policies, procedures or other internal business-related confidential communications.

Respect your audience. Avoid using statements, photographs, video or audio that reasonably could be viewed as malicious, obscene, threatening or intimidating, that disparage clients or customers, or that might constitute harassment as prohibited by CMMB's Anti-Harassment/Discrimination/EEO Policy and Complaint Procedure. Examples of such conduct might include offensive posts meant to intentionally harm someone's reputation or posts that could contribute to a hostile work environment on the basis of any Protected Characteristic as defined in CMMB's Anti-Harassment/Discrimination/EEO Policy and Complaint Procedure or any other basis made unlawful by federal, state or local law or ordinance or regulation.

Be truthful. Do not post any information or rumors that you know to be false about CMMB's employees, interns, volunteers, customers, vendors, clients, or people working on behalf of CMMB.

Respect privacy rights. You are urged to respect copyright and intellectual property rights of others in their use of social media. Further, avoid disclosing personal information about CMMB's program participants/beneficiaries, donors, clients or vendors that you learn during your work at CMMB.

FACEBOOK "FRIENDING" GUIDELINES

If you choose to become a "Friend" of CMMB on "Facebook," remember that your personal "Facebook" page may be seen by others who are "Friends" of CMMB, including other employees, management, customers and potential customers. Consequently, you must be aware that your personal "Facebook" page will reflect on CMMB.

CMMB allows limited and occasional use of social networking sites during working time as long as such use is not excessive or does not interfere with work responsibilities or otherwise violate CMMB's policies.

CMMB reserves the right to monitor all public blogs and social networking forums for the purpose of protecting its interests and monitoring compliance with organizational policies. CMMB may, at its discretion, remove any posts from any social media that it finds does not support its core values, or that otherwise violates these guidelines or other CMMB policies. Additionally, CMMB reserves the right to take steps to shut down any external postings by any CMMB employee, intern or volunteer that violates these guidelines.

If you have questions regarding these guidelines, please contact Human Resources.

Employees, interns, and volunteers who violate the Social Media Policy may be subject to disciplinary action by CMMB, up to and including termination of employment.

M. WORKPLACE VIOLENCE POLICY

PURPOSE

CMMB is committed to providing a safe and healthy workplace. The purpose of this policy is to minimize the risk of personal injury to employees and damage to Organization and personal property. CMMB expects that all employees must be always treated with courtesy and respect while engaged in business with, or on behalf of CMMB, whether on or off CMMB premises.

SCOPE

This policy applies to all persons involved in CMMB operations and affairs.

POLICY

CMMB does not expect employees to become experts in psychology or to physically subdue a threatening or violent individual. Indeed, CMMB specifically discourages employees from engaging in any physical confrontation with a violent or potentially violent individual. However, CMMB does expect and encourage employees to exercise reasonable judgment in identifying potentially dangerous situations.

CMMB has a Zero Tolerance policy for any words and or actions that threatens, intimidates or coerces its employees, interns, volunteers' visitors, collaborators and partners. This includes verbal confrontations and any behavior that reasonably causes others to feel unsafe in the workplace. All employees are prohibited from making threats or engaging in violent behavior including but not limited to the following examples:

- Injuring another person,
- Threatening another person,
- Acting aggressively and creating a fear of injury or emotional distress to another person,
- Intentionally damaging CMMB property or the property of another employee,
- Bringing weapons on CMMB property or carrying one while on CMMB premises or worksite including CMMB vehicles, or
- Committing acts of violence related to or motivated by sexual harassment or domestic violence.

All employees are responsible for helping create an environment of mutual respect for one another as well as for visitors, collaborators and partners, following all policies, procedures, and for maintaining a safe and secure work environment.

REPORTING PROCEDURE

All potentially dangerous situations, including threats by co-workers, should be reported immediately to any member of management with whom the employee feels comfortable. Reports of threats may be maintained confidential to the extent maintaining confidentiality does not impede CMMB's ability to investigate and respond to the complaints. All threats will be promptly investigated. All employees must cooperate with all investigations. No employee will be subjected to retaliation, intimidation, or disciplinary action as a result of reporting a threat in good faith under this policy.

All incidents of violence or threatening behavior will be responded to immediately upon notification. If the Organization determines, after an appropriate good faith investigation, that someone has violated this policy, the Organization will take swift and appropriate corrective action.

If the employee is the recipient of a threat made by an outside party, that employee should follow the steps detailed in this section. It is important for the Organization to be aware of any potential danger in its offices. Indeed, the Organization wants to take effective measures to protect everyone from the threat of a violent act by employees or by anyone else.

N. NON-DISCLOSURE OF CONFIDENTIAL INFORMATION POLICY

PURPOSE

The protection of privileged and confidential information, including trade secrets, is vital to the interests and the success of CMMB. This is a basic component of donor care and business ethics. By necessity personal and private information is disclosed in a professional working relationship. Part of what you learn is necessary to provide services to beneficiaries or donors; other information is shared within the development of a helping, trusting relationship. Therefore, most information gained about individual donors through an assignment is confidential in terms of the law, and disclosure could make you legally liable.

SCOPE

This policy applies to all persons involved in CMMB operations and affairs.

POLICY

Any information that an employee learns about CMMB, or its members or donors, as a result of working for CMMB that is not otherwise publicly available constitutes confidential information. Employees may not disclose confidential information to anyone who is not employed by CMMB or to other persons employed by CMMB who do not need to know such information to assist in rendering services.

Anyone with access to, or who inadvertently receives, confidential material may not disclose the information to anyone who is not employed by CMMB or to other persons employed by CMMB who do not need to know such information to assist in rendering services. Any information that an individual learns about CMMB, or its members or donors, as a result of working with CMMB that is not otherwise publicly available constitutes confidential information.

Any person who discloses confidential CMMB information outside of a reasonable professional working relationship will be subject to disciplinary action (including possible separation), even if they do not actually benefit from the disclosure of such information. Discussions involving sensitive information should always be held in confidential settings to safeguard the confidentiality of the information. "Confidential" means that you are free to talk about CMMB and about your program and your position, but you are not permitted to disclose beneficiaries or donors' names or talk about them in ways that will make their identity known. No information may be released without appropriate authorization. Conversations regarding confidential information generally should not be conducted in elevators, restrooms, restaurants, or other places where conversations might be overheard.

O. POLICY PROHIBITING USE OF DRUGS AND ALCOHOL

PURPOSE

To help ensure a safe, healthy, and productive work environment for our employees and others, to protect Organization property, and to ensure efficient operations, CMMB has adopted a policy of maintaining a workplace free of drugs and alcohol. This policy applies to all employees and other individuals who perform work for the Organization. As a US-based organization, CMMB must follow the US federal laws as well as the laws governing the regions of our operations. Our approach to a drug-free workplace aligns with the US Drug-Free Workplace Act.

SCOPE

This policy applies to all persons involved in CMMB operations and affairs.

POLICY

CMMB maintains a drug-free workplace. The unlawful or unauthorized use, abuse, solicitation, theft, possession, transfer, purchase, sale, or distribution of controlled substances (including medical marijuana), drug paraphernalia or alcohol by an individual anywhere on Organization premises, while on Organization business (whether or not on Organization premises) or while representing the Organization, is strictly prohibited. In keeping with CMMB's strong commitment to provide a safe, efficient, and productive work environment, CMMB strictly prohibits the following activities:

A. Controlled Substances

No employee may engage in the unlawful manufacturing, distribution, dispensation, possession, or use of any illegal drug prior to going on duty, while on duty, while operating a vehicle that is owned or leased by CMMB, while on standby status, or while otherwise performing CMMB's business, either on or off the premises. In addition, involvement with illegal drugs outside of working hours which interferes with employee performance, or which has or may have an adverse effect on CMMB is strictly prohibited.

B. Alcohol

No employee may use, possess, manufacture, dispense, distribute or sell any alcohol prior to going on duty, while on duty, while operating a vehicle that is owned or leased by CMMB, while on standby status, or while otherwise performing CMMB's business, either on or off the premises.

On special occasions alcohol may be served at CMMB celebrations but at these events, employees are responsible for their own decision-making regarding alcohol consumption including limiting their intake, behaving in a respectful manner to all others at the event, and determining a safe means of transportation after the event. CMMB accepts no liability for the actions of staff who over-consume alcohol at an event.

C. Smoking

CMMB maintains a smoke-free workplace and thus smoking, whether with cigars, cigarettes or e-cigarettes, is not permitted within the building or directly in front of the entrance to the building. Employees who wish to smoke may smoke outside of facilities. CMMB does not provide employees with any smoking breaks.

D. Prescribed Drugs and Over the Counter Drugs

Prescribed drugs and over-the-counter drugs that are improperly used or possessed by the employee are restricted to the same extent as controlled substances. Employees taking a prescribed drug at work must keep the drug in its original container to identify the drug, dosage, date, prescription, and authorizing physician.

Employees must be fully aware of and comply with any work restrictions that should be observed while taking a drug. If use of a drug may affect an employee's ability to perform his or her job, the employee must notify Human Resources. This information will be kept confidential.

All employees must abide by this policy as a condition of employment. Violation of this policy can result in disciplinary action, up to and including immediate termination, even for a first offense. CMMB also reserves the right to discipline or terminate employees convicted of an offense which involves the use, possession, manufacturing, dispensing or distribution of illegal drugs or alcohol.

You must notify CMMB of any drug related conviction within five (5) days of the conviction. CMMB'S policy is intended to comply with all state and federal laws governing drug and alcohol testing and is designed to safeguard employees' privacy rights to the fullest extent of the law.

The Organization maintains a policy of non-discrimination and will endeavor to make reasonable accommodations to assist individuals recovering from substance and alcohol dependencies, and those who have a medical history which reflects treatment for substance abuse conditions. However, employees may not request accommodation to avoid discipline for a policy violation. We encourage employees to seek assistance before their substance abuse or alcohol misuse renders them unable to perform the essential functions of their jobs or jeopardizes the health and safety of any Organization employee, including themselves.

REASONABLE SUSPICION OR OTHER TESTING

An employee may be asked or required to submit to testing procedures designed to detect the presence of drugs and/or alcohol under certain circumstances. By way of example only, testing may be required if an employee: (1) is acting in a manner that leads to a suspicion that she/he either possesses, controls, or is under the influence of a drug and/or alcohol, (2) was directly or indirectly involved in a work-related accident or mishap where there is a reasonable assumption that drug and/or alcohol use was a factor, (3) performs safety-sensitive, safety related or security sensitive work, or (4) is suspected of having been involved in the use, possession, transfer, distribution, manufacture, and/or sale of drugs or alcohol on Company or client premises, while on duty, or while operating a vehicle or potentially dangerous equipment owned or leased by CMMB.

If management suspects an employee of working while under the influence of illegally used drugs and/or alcohol, the employee will be suspended and required to submit to a drug and/or alcohol test. Suspension shall be without pay until the results of the test are obtained by CMMB. If the results are negative, the employee will be reinstated and compensated for normal hours of work missed as a result of the suspension.

You may refuse to consent to testing. However, any employee who does not consent to and cooperate fully with any search and/or medical testing procedure will be subject to immediate termination.

TESTING PROCEDURES

Any drug and/or alcohol testing requested by CMMB will be paid for by CMMB and conducted by a laboratory licensed by the state. Any employee injured on the job, where CMMB has reasonable suspicion that the illegal use of drugs or the use of alcohol are involved, must be examined and drug-tested by a CMMB-authorized physician. Each employee asked to submit to a drug or alcohol test will be notified of their results by CMMB within 72 hours of receiving the lab results.

CONFIDENTIALITY

All information relating to drug/alcohol testing or the identification of an employee as a use of drugs or alcohol will be protected by CMMB as confidential unless otherwise required by law, overriding public health and safety concerns, or authorized in writing by the employee.

P. CONFLICT OF INTEREST POLICY

PURPOSE

CMMB holds its employees, directors and volunteers to conduct business with the highest degree of ethical standards. Especially those in management, leadership and director roles are expected to model ethical behavior in their leadership and business transactions. Acting as stewards of the resources bestowed by our donors to our century old healing mission is important that CMMB property be protected, and that business decisions and transactions be free from improper conflicts of interest, perceived or real.

Disclosing any conflict of interests should provide:

- Identification of the financial, business, or personal interest in conflict with CMMB's interest.
- Disclosure of the conflict.
- Discussion of any impact on CMMB and possible remedial actions or mitigations which may include recusal from business decision or transaction involving CMMB or the other organization or other actions that eliminate the conflict of interest or appearance of a conflict of interest.

SCOPE

This policy applies to all persons involved in CMMB operations and affairs.

POLICY

CMMB requires its Executive Level employees and directors to complete Conflict of Interest Disclosure Form on an annual basis. The disclosure questionnaire focuses on essential information and affiliations provided by employees and directors to assist in identifying whether a conflict exists and to ensure that the necessary remediation of that conflict to enable the employee, director or volunteer act in the best interest of CMMB.

Staff members directly involved in a procurement (either via procurement committee or as a purchase requester) must also sign a Conflict of Interest Disclosure Form as part of the requirements of CMMB Procurement Policies.

CMMB prohibits employees, directors and volunteers from placing themselves in a situation or relationship where their actions are, or could be reasonably interpreted to be, motivated by personal profit or gain. The following list illustrates some actions that could present a conflict of interest:

- No employee, director or volunteer may use the buying power of CMMB to acquire goods or services for his or her own gain.
- No employee, director or volunteer may use the CMMB tax-exempt number for any private purchases whatsoever.
- No employee, director or volunteer may solicit, directly or indirectly, any gift, gratuity or favor from a vendor that might reasonably be perceived by others as affecting performance of their duties. Any gifts, in excess of \$75, that employees, directors or volunteers receive must be reported to the head of their respective department.

These examples are not exhaustive and are not intended to be comprehensive; they do not change the terms of engagement for Board of Directors, volunteers, or the employment-at-will relationship between CMMB and its employees.

EXHIBIT A

DISCRIMINATION/HARASSMENT/RETALIATION COMPLAINT FORM

Instructions: If you believe that you have been subjected to harassment or discrimination in violation of the Company's Anti-Harassment/Discrimination/EEO Policy and Complaint Procedure, you are encouraged to complete this form and submit it to the Country Director, Human Resources, or the Vice President of Human Resources. You will not be retaliated against for filing a complaint.

If you are more comfortable reporting verbally or in another manner, the Company will follow its Anti-Harassment/Discrimination/EEO Policy and Complaint Procedure by investigating the claims.

For additional resources, visit: <https://www.ny.gov/programs/combating-sexual-harassment-workplace>

COMPLAINANT INFORMATION

Name:

Home Address:

Home Phone:

Job Title:

Work Address:

Work Phone:

Email:

Preferred Communication Method:

SUPERVISORY INFORMATION

Immediate Supervisor's Name:

Title:

Work Phone:

Work Address:

COMPLAINT INFORMATION

1. Your complaint of harassment or discrimination is made about:

- Name:
- Title:
- Work Address:
- Work Phone:
- Relationship to you: Supervisor Subordinate Co-Worker Other

2. Please describe what happened and how it is affecting you, and your reasons for concluding that the conduct is harassment or discrimination. Please use additional sheets of paper if necessary or attach any relevant documents or evidence.

3. Date(s) harassment or discrimination occurred:

Is the harassment or discrimination continuing? Yes No

- 4. Please list the name and contact information of any witnesses or individuals who may have information related to your complaint:

- 5. Have you previously complained or provided information (verbal or written) about related incidents? If yes, when and to whom did you complain or provide information?

I request that the Company investigate this complaint of harassment or discrimination in a timely and confidential manner (to the extent possible and in accordance with applicable law) and advise me of the results of the investigation.

Signature: _____ Date: _____

Signature of Person Reviewing Complaint _____ Date _____

EXHIBIT B

ETHICAL DECISION GUIDANCE TREE

PURPOSE

The Ethical Decision Tree can guide you to make the right decision when faced with difficult situations.

Simply go through the steps with your dilemma and it will guide you on whether to continue or instead consult your supervisor, relevant department head, or the Director of Ethics and Compliance.

