Code of Conduct for BRAC and BRAC International

1. Introduction

BRAC achieves large-scale, rapid change, by working with individuals, families, communities, and institutions, to overcome poverty. BRAC's comprehensive approach to financial inclusion, capacity development, health, education, and social justice, enables people to realize their potential. BRAC is pioneering a new kind of organization, that integrates development programmes with social enterprises, enabling both the people we serve, and our organization itself, to become self-reliant. BRAC has deep knowledge and experience, born from decades of working and being headquartered in the Global South.

BRAC's vision is for a world free from all forms of exploitation and discrimination, where everyone has the opportunity to realize their potential.

The mission of BRAC is to empower people and communities in situations of poverty, illiteracy, disease and social injustice. Our interventions aim to achieve large scale, positive changes, through economic and social programmes that enable women and men, to realize their potential.

BRAC's values are: Integrity, Innovation, Inclusiveness, and Effectiveness.

2. Definitions

For the purposes of this Code of Conduct (CoC), the terms listed below shall have the following meanings:

"**Employee**" all staff, including regular, contractual, fixed-term, project, service, trainees (including apprentices & interns), temporary staff, and non-graded staff.

"Associated Personnel" includes all persons, who are not contracted as employees, but are associated with, or representing BRAC. This includes; volunteers, outreach workers, interns, consultants, Board members, and advisors.

"Confidential Information" shall include any proprietary information, technical data, trade secrets, or know-how, including but are not limited to, research, product plans, products, services, customers, customers lists, markets, software, developments, inventions, processes, formulas, technology, designs, drawings, engineering, hardware configuration information, marketing, finances, or other business information disclosed by BRAC or any BRAC entity, donor or client, either directly or indirectly, in writing, orally, or by drawings, or inspection of parts, or equipment.

"Governing Documents of BRAC' shall include national laws (as relevant); BRAC's governing regulations, policies, statutes, guidelines and bye-laws, in place from time to time.

"Personal relationships" shall include parents, in-laws, children, siblings, spouses.

"Third Parties" shall include all agents, partners, suppliers, contractors and consultants of BRAC, and their respective management, staff, interns, and volunteers.

"You" shall include all BRAC Management, staff, interns, volunteers and Third parties, for whom this policy will be applicable.

3. Purpose:

BRAC is committed to high ethical and professional standards, and the objective of this Code of Conduct is to clarify the expected standards of behaviour, during employment with BRAC. This CoC makes explicit, which behaviour is expected, and which is not acceptable. While working with BRAC, it is a requirement for all employees and associated personnel, to adhere all policies. The CoC describes in four categories: Professional, Interpersonal, Use and Misuse of Power, and Financial and Property Responsibilities, the Behaviour (**Do's** derived from BRAC's Vision, Mission and Values), as well as a non-exhaustive list of **Don't's** (unacceptable behavior), The CoC mandates accountability from employees and associated personnel, and guides them to act in a way that is consistent with our values and principles.

4. Scope

This CoC applies to all employees and associated personnel of BRAC and BRAC International (BI). Employees include: all staff, including regular, contractual, fixed-term, project, service, trainees (including apprentices & interns), temporary staff, and non-graded staff. The term, Associated Personnel, includes all other persons, who are not contracted as employees, but are associated with, or representing BRAC. This includes: volunteers, interns and consultants/advisors.

BRAC's staffs are the fundamental and ultimate building blocks of the organization. BRAC employees are expected to exemplify BRAC's values, and further its vision. BRAC employees pledge to follow all BRAC policies. Their behaviour, decisions, and actions reflect the directives of BRAC policies.

While working with BRAC, it is a requirement for all employees and associated personnel, to adhere all policies. Particular attention must be given to the following policies:

- The Safeguarding policy with the subset policies: Sexual Harassment Elimination policy, Child and Adolescent Protection policy, Whistleblowing policy, Prevention of Workplace Bullying and Violence policy, and Adults with Special Needs policy.
- BRAC's Communication, Branding, and ICT guidelines
- BRAC's policy, Health and Safety, Environmental, and Risk Management
- BRAC's Anti-Corruption, Anti-bribery and Terrorism policy
- Conflict of Interest policy

This Code of Conduct may be amended unilaterally by BRAC when necessary.

5. Professional Behaviour (do's and don'ts)

In line with BRAC's values every, employee and associated personnel, must behave in a manner that is appropriate to their job, role, and tasks, to strengthen the professional reputation of BRAC. This is especially because different jobs, roles and tasks carry in them specific professional and ethical responsibilities (e.g. trainers, HR personnel, medical jobs, drivers, etc).

This section covers expected and unacceptable behaviours from employees, associated personnel, when conducting organizational business and representing the organization, internally and externally.

The following standards of behaviour are the minimum requirements for all employees and associate personnel:

Do:

a) *Perform duties with honesty, integrity, and sincerity*
b) *Serve clients and programme participants with fairness, transparency, promptness, clarity, respect and courtesy*
c) *Adhere to the Code of Conduct and all other BRAC policies*
d) *Disclose any criminal convictions or police investigations against you*
e) *Comply with office orders, procedures, and legal official instructions of higher authority*
f) *Adhere to all BRAC policies, operating procedures and guidelines*
g) *Respect working hours*
h) *Dress in a culturally sensitive manner*
i) *Follow travel and residence rules*

Do not:

a) *Break any national law, while performing organizational duties or in personal life*
b) *Engage in any activity, subversive of the state*
c) *Marry again, if currently married, as for BRAC, this is against BRAC policy*
d) *Participate in any violent behaviour while performing duties or in personal life*
e) *Accept, demand, or facilitate dowry in marriage*
f) *Marry or arrange marriage, for girls under 18 years of age, Or boys under the age of 21*
g) *Engage in any activities that is subversive to BRAC's interest, management or reputation*
h) *Disseminate any intellectual property, including any materials, documents, audio, video, programmes, concepts and systems, that are solely owned, trademarked and copyrighted by BRAC (unless with written permission)*
i) *Smoke outside of designated "smoking zones" during work hours*
j) *Consume alcohol during working hours, or illegal drugs at any time*
k) *Engage in willful insubordination or disobedience, whether alone or in combination with others, to any lawful or reasonable order of a superior*
l) *Engage in habitual absence or tardiness*

m) *Commit theft, fraud or dishonesty, in connection with the organization*
n) *Take or give bribes*
o) *Conduct riotous or disorderly behaviour or any act subversive of discipline*
p) *Engage in habitual negligence, or neglect of work*
q) *Falsify, tamper with, damage or cause loss of employers' official records*
r) *Disseminate or disclose confidential information, in any form (print, electronic, for publishing) to anyone (e.g. any person, firm or network of any sort) relating to BRAC, (unless with written permission). Nor change, forge or destroy any BRAC document*

6. Interpersonal behaviours (do's and don'ts)

This section covers expected and unacceptable behaviour from BRAC employees and associated personnel, when communicating and/or interacting with others, both within and outside of the organization.

One of the BRAC's core values is the promotion of inclusivity, and valuing diversity. BRAC does not accept unfair discrimination on any grounds. All BRAC employees and associated personnel, must seek to ensure that the work environment is supportive to all employees, suppliers, programme participants, and all others external partners, with which BRAC does business, regardless of gender, race, ethnic background, culture, disability, political ideology, sexual orientation, age, religion, socio-economic status, or any other factors.

The following standards of behaviour are the minimum requirements for all employees and associate personnel, with regard to discrimination and safeguarding for the prevention of abuse, that is, sexual harassment, intimidation and violence, bullying, humiliation and discrimination, neglect and exploitation.

Do:

a) *Treat everybody with respect and courtesy*
b) *Respect everybody's privacy*
c) *Practice and promote diversity and inclusion, treat everyone justly without discrimination.*
d) *Eensure a just, and safe environment for children and adolescents*
e) *Be aware of risks of harassment and exploitation in the workplace, of programme participants, and take steps to mitigate those risks*
f) *Report any abuse or discrimination, witnessed by appropriate internal (e.g. HRD) or external reporting (e.g. police) avenues*

Do not:

a) *Discriminate against anybody on the basis of race, ethnicity, religion, gender, nationality, age, sex, sexual orientation, physical or mental ability, socioeconomic status, geography or any other factors.*
b) *Violate any of BRAC' policies, with particular attention to the Safeguarding policy (do not discriminate, bully, harass, exploit, neglect or abuse anybody, with particular attention to children, adolescents, women, persons with special needs)*
c) *Commit or threaten to physically assault*

d) *Hit anybody*
e) *Assault or threaten to assault anybody with or without a weapon*
f) *Bully or humiliate anybody, including, children or adolescents*
g) *Interact sexually with anybody, without the other's consent*
h) *Sexually harass or assault anybody*
i) *Have any sexual interaction with any children or adolescents*
j) *Have any sexual interaction with fellow employees of BRAC, in exchange for money, goods or favors, or based on any form of coercion*
k) *Exploit children, adolescents, or adults, both BRAC staff and programme participants in any form*
l) *Make a wrongful, frivolous, or vexatious allegations against anyone.*
m) *Use any degrading or derogatory words or language, cartoons, pictures, e-mails, SMS, social media statements, or pranks of any kind*
n) *Favor or disfavor for personal gain of any person, organization, or enterprise dealing with BRAC in an procurement or business relationship*

7. Use and misuse of power (do's and don'ts)

This section covers expected and unacceptable behaviours from BRAC employees and associated personnel, related to potential abuse of their designated roles at BRAC.

The following standards of behaviour are the minimum requirements for all employees and associate personnel, with regard to both positive and incorrect use of power.

Do:

a) *Ensure that roles and responsibilities for different employees, associate personnel, and volunteers within BRAC programmes, enterprises, and countries are clear*
b) *Be modest and polite, when interacting with others, especially junior level staff, and programme participants*
c) *Maintain strict confidentiality of information, during and after the termination of service, and adhere to BRAC's data protection policy*
d) *Raise issues when necessary, about behaviours that may create a work environment, which is contrary to the safe and harassment-free workplace that BRAC strives to create*
e) *Have no 'conflicts of interest", which are formalized and approved, at appropriate management and audit level*
f) *Declare any personal relationships with any of BRAC employees, third parties, partners for the Personal Information Form. Human Resources decides whether there is a potential conflict of interest, needing to be solved*
g) *Provide constructive feedback to direct supervisee(s) for performance improvement*

Do not:

a) *Bully, harass, neglect, harm, misuse, discriminate, or exploit anyone, with whom one comes into contact*

b) *Criticize anyone behind their back about background, attitude, work or personal matters, or spread rumors (e.g. at the workplace or in media/social media)*
c) *Interfere in any employee, associated personnel, client or participant's personal life*
d) *Create obstacles in other's work by any means (e.g. with ill-behaviour or by inflicting mental pressure, or by any other 'blackmailing' means)*
e) *Engage any employees or programme participants, for personal work*
f) *Require BRAC employees to come to office, after working hours, or during holidays, or at head or regional office, without any purpose, nor keep them waiting for long hours without any reason*
g) *Misuse authority or position, or any official resource, for personal gain*
h) *Demand or accept bribes, or any kind of illegal or undue favours/advantages in any form (monetary or non-monetary), from any person or organization*
i) *Recruit into a direct position of authority or subordination with any person, with whom you have a personal relationship, (unless with permission for an exception from higher authority)*
j) *Get involved in business with BRAC directly or indirectly, outside your formal function within BRAC*
k) *Give job threats to junior level employees*

8. Financial and Property Responsibilities (do's and don'ts)

This section covers conduct that is related to all forms of financial irregularities, such as falsifying financial books, fraud, stealing, money-laundering, finance, for criminal activities of any sort, which are and have always been, strictly prohibited within BRAC. Responsibilities towards protection of BRAC's property and assets, are also included in this section.

The following standards of behaviour are the minimum requirements for all employees and associate personnel (which can include volunteers), with respect to responsibilities regarding finance and property of BRAC.

Do:

a) *Handle all BRAC's financial, physical, and other resources with care, at all times, ensuring their proper and professional use*
b) *Take professional care of any official assets, and any official records, in any of BRAC's offices*
c) *Ensure and record full accountability in all financial-, stocktaking-, procurement- and property transactions*
d) *Ensure the proper uses of office computer, internet, or any other equipment, to view, download, create or distribute materials, which are only related to your official work*

Do not:

a) *Engage in any form of theft, fraud, money-laundering, or falsifying financial books*
b) *Engage in any form of financing of political or criminal activities, including terrorism*
c) *Commit theft, fraud or dishonesty, in connection with the organization*

d) *Take or give bribes*
e) *Remove, destroy, modify, or steal any property, in any of BRAC's offices or premises, including official records*
f) *Use BRAC's equipment, assets, or documents, for personal use, without prior approval from appropriate authority*
g) *Use BRAC's computers or other equipment to view, download, create or distribute inappropriate material that are unrelated to your official work, including pornography*

9. Reporting and Investigation Procedures

Breaches of the Code of Conduct must be reported, investigated and dealt with, in a procedurally fair manner, for all parties involved.

Any staff experiencing or witnessing a possible breach of this Code of Conduct can:

- *Report the incident to a manager or supervisor*
- *Report it to other relevant bodies of BRAC's reporting system. such as the Sexual Harassment Redressal Committee (SHRC), Grievance Management Unit or HRD, Human Resources Compliance Committee (for BI countries)*
- *Use the methods outlined in the Whistleblowing policy if relevant*

Reporting Contact Information:

Complaints can also be lodged directly to the Chairperson, Executive Directors, Chief People Officer (CPO), Directors of Human Resources, Senior Directors, Country Representatives, and Regional Directors.

BRAC, Bangladesh:

Complaints are received through both, phone calls and emails, or in person. Report can be lodged immediately, through any of the following ways:

Calls: Anyone can call to lodge a complaint 24/7, through the helpline numbers; ***Sexual Harassment Redressal Committee***: +8801729071546, ***Grievance Management Unit:*** +880-1730346883, +880-1708491000

Emails: SHRC Complaints can be lodged through email at complaint.shrc@brac.net for Bangladesh.

BRAC International:

Calls: For countries other than Bangladesh, use the contact number for respective country offices.

Emails: voice.country name@brac.net (i.e for Uganda voice.uganda@brac.net, for Afghanistan –voice.afghansitan@brac.net)

Investigation:

BRAC internal investigations will follow the ***Internal Investigations Guidelines and***

Procedures. The core principles of investigation including confidentiality, impartiality, integrity, child protection, and gender sensitivity will be maintained. The Investigations Team is required to maintain strict confidentiality of the investigation, until a decision has been made by the authority.

Every employee of BRAC is committed to stay impartial as witness, cooperate in any investigation, and give authentic information.

Personal declaration:

- I confirm that I have read, understood, and shall abide by the Code of Conduct for the entire period I am working or associated with, and or represent, BRAC
- I understand that BRAC expects its employees and/or associated personnel, to adhere to this Code of Conduct at all times.
- I understand that violation of any of the above provisions of the Code of Conduct can, depending on the degree of severity, result in appropriate disciplinary action by the authority.

Name: _____

Employee ID: _____

Department: _____

Signature & Date: _____

Approved.
19/2/2020