

GLOBAL FUND FOR
WOMEN

CODE OF CONDUCT



CONTENTS

PART 1 - COMMITMENT TO OUR PRINCIPLES	1
Vision and Mission	3
Values	4
Culture	5
Integrity and Compliance	6
Commitment to the Code	8
Ethical Dilemmas	11
PART 2 - COMMITMENT TO A SPEAK UP, LISTEN UP CULTURE	12
Speak up, Listen Up	13
Channels for asking questions and reporting concerns	13
Anonymity and Confidentiality	14
Whistleblower Protection	14
Cooperation and Responsiveness	16
Violations	16
PART 3 - COMMITMENT TO PROMOTING WELL-BEING AND PREVENTING HARM	18
Gender Justice	19
Safeguarding	19
Child Protection	20
Anti-Sexual Exploitation and Abuse	23
Disability Justice	24
Racial Justice	24
Anti-Trafficking	26
Ethical Storytelling	26

PART 4 - COMMITMENT TO THE MOVEMENTS	28		
Movement Actors and Funded Partners	29		
Other Stakeholders	30		
PART 5 - COMMITMENT TO GLOBAL FUND FOR WOMEN	31		
• Equity, Inclusion, Diversity, and Belonging	33		
• Equal Employment Opportunity	33		
• Non-Discrimination and Preventing Harassment and Bullying	34		
• Combatting Sexual Harassment	36		
• Drug-free Workplace	36		
• Global Safety and Security	36		
• Communication on behalf of Global Fund for Women	37		
• Use of Global Fund for Women property	42		
PART 6 - COMMITMENT TO DATA INTEGRITY	43		
• Responsible data management	44		
• Digital Protection and Privacy	45		
• Confidential Information - intellectual property	47		
• PART 7 - COMMITMENT TO OPERATIONAL INTEGRITY	48		
Anti-Corruption	49		
• Conflicts of Interest	52		
• Hiring family or persons known to you	54		
• Gifts, Gratuities, and Business Courtesies	54		
• Political Activities - participation in elections	55		
• Lobbying	56		
		• Procurement Integrity	58
		• Financial Integrity	59
		• Anti-terrorist financing	60
		• Records management	61
		PART 8 - ENFORCEMENT	62
		PART 9 - ACKNOWLEDGEMENT	64



A Note from our CEO, PeiYao Chen

This Code of Conduct is not intended to make us experts on every issue, but rather to help us spot risks, obtain guidance and make good choices. Put simply: our values guide us to do the right thing even when the right thing is hard to do. And our values are the through-line in this Code of Conduct.

Please join me in resolutely affirming our commitment to work ethically and collaboratively, listen to one another and our stakeholders, and hold ourselves accountable not only for what we do but also for how we do it.

COMMITMENT TO OUR PRINCIPLES

WHAT DOES IT MEAN TO BE A FEMINIST ORGANIZATION?

Gender justice means working for progress with an intersectional lens, and dismantling the multiple overlapping systems such as patriarchy, racism, homophobia, and transphobia that impact women, girls, and gender-nonconforming people around the world.

Vision and Mission

Our 2030 Vision

We envision a world where movements for gender justice have transformed power and privilege for a few into equity and equality for all.

Our Mission

Our mission is to fund and strengthen bold and ambitious gender justice movements to create lasting meaningful change.

We offer flexible, feminist support to fuel collective action and create meaningful change that will last beyond our lifetimes. Our support for movements goes beyond money. We advance feminist peer learning and exchange through convenings and collaborations; bridge connections between and among activists; and provide tools and trainings that help strengthen movements.

Our Work

We're flipping the script on traditional philanthropy by supporting movements as they determine their own needs, set their own agendas, and drive their own solutions. The movements we work with are bold and intersectional—and they're making waves around the world.

Values

Our values guide our conversations, decisions, and interactions with colleagues, grantee partners, feminist funds and organizations, resource partners, and other stakeholders. We are:

BOLD

We are willing to take risks and be creative and imaginative.

COLLABORATIVE

We make progress together, not alone. We're ready to trust, partner, and stand with others who share our beliefs.

CURIOUS

We seek out new ideas and diverse perspectives. We are transparent, welcoming, and passionate about learning and improving.

AUTHENTIC

Our work is rooted in principles and in our commitment and connection to women's movements around the world.

Culture

We strive to uphold a working culture of collaboration, experimentation, teamwork, innovation, care, empathy, and respect.

We are committed to creating spaces where challenging conversations and experiences can be held by upholding truth and making the space as safe as possible. We value invitational language and making offerings over prescriptions. We speak our truths in "I" statements. We self-correct in real time, acknowledge our limitations, and listen for understanding when offense has been taken.

We make our best effort to plan and organize well thought-out programs with intention. When and where possible, it may be necessary to reorganize or change the plan to meet emergent needs. We value the ability to pivot and practice adaptive management.



Integrity and Compliance

The Integrity and Compliance Program is focused on supporting each of us to maintain responsible and effective governance and ethical conduct. It is designed to anticipate and respond to challenges that may arise as we pursue our mission. Without a structure, and associated tools and resources to manage such challenges, we expose ourselves to risk.

The Integrity and Compliance Program aims to accomplish two big things:

- **1. Integrity:** Define what it means to do the right thing at Global Fund for Women by putting our values into practice to set the standards of behavior across our organization.
- **2. Compliance:** Support the development of processes, procedures, and tools to ensure all Global Fund for Women personnel follow those standards.



Commitment to the Code

Preserving the trust of our stakeholders is our shared responsibility. The Code is designed to help each of us continue to meet this responsibility.

This Code covers the conduct of all Global Fund for Women personnel regardless of their employment status or location, as well as the conduct of the Board of Directors in the execution of their governance duties and responsibilities. This Code is a supplement to related Board Operating Procedures. The Code also covers the conduct of Global Fund for Women's partners and contractors.

The principles and policies established by this Code apply 24 hours a day, 365 days per year.

This Code outlines Global Fund for Women's high expectations for how we work. We commit to understanding this Code and to abiding by these principles:

- To act honestly, truthfully, and with integrity in all our transactions and dealings.
- To avoid conflicts of interest and appropriately handle actual or apparent conflicts of interest in our relationships.
- To treat stakeholders fairly, and with dignity and respect.
- To treat colleagues with respect, fairness, and good faith and to provide conditions of employment that safeguard their rights and welfare.
- To comply with both the spirit and the letter of the law.
- To act responsibly toward and for the benefit of the movements we support.
- To encourage accountability, transparency, ethical conduct, and effectiveness of the movements we support.
- To Speak Up about concerns free from any fear of retaliation.

Managers

A critical element of our Integrity and Compliance Program is the tone that is set at the top.

The atmosphere that leadership creates will shape Global Fund for Women's team behavior. If leadership upholds high standards of ethics and integrity alongside principles of intersectional feminism, personnel will be more inclined to uphold those same values. In addition to the principles outlined above, managers have a specific responsibility to lead by example.

Managers are often the first point of contact for questions or concerns, so managers must encourage communication, educate themselves on our compliance resources and processes, and be prepared to escalate concerns when necessary. Managers must also model ethical behavior and embody our values.



Individuals

- Read , understand, and uphold this Code.
- Think about how the Code applies to your role and consider how you might handle situations to avoid improper, illegal, or unethical actions.
- Consult the “Q&A” examples included here since they deal with common questions and situations. If you have questions or need clarification, ask your manager or contact one of the resources listed within the Code.
- Be proactive when a situation raises a “red flag” or troubles your conscience.
- Speak up about violations of our Code, our policies, or the law.

Ethical Dilemmas

We will encounter situations that will test our judgment and integrity. When faced with an ethical dilemma, we need to be able to recognize it as an ethical issue and rely on this Code and advice from designated colleagues listed within this document to do what is right. Here are some red flags that may indicate an ethical issue:

- Are you or someone trying to keep it a secret?
- Is it something we would not want to share publicly on social or news media?
- If it was made public, would you feel comfortable explaining it to colleagues or even investigators?
- Is your judgement impartial, or do you have a personal stake in the outcome that makes you less objective?

Before making a decision, or pursuing a course of action, consider the following:

- Does the decision or action meet the letter and spirit of the Code and other Global Fund for Women policies and procedures?
- Is it legal?
- Read the policy language. If you are unsure if the policy applies, ask your manager or Executive Team member or contact the Senior Director of Integrity and Compliance.
- If you suspect the decision or action violates this Code or other policies, Speak Up. You are not responsible for investigating violations of policies; you are responsible for raising them.

COMMITMENT TO ASPEAK UP, LISTEN UP CULTURE

Speak up, Listen Up

Global Fund for Women's Speak Up practice is designed to build the confidence of personnel to report genuine concerns about misconduct. For many cases of misconduct, a report is the only way it will be discovered and dealt with.

Global Fund for Women encourages all personnel in management roles to pay attention, actively listen, and give credence to the voices, opinions, and concerns of others. This culture values open communication, empathy, and inclusivity, promoting an environment where everyone feels heard and respected.

Managers are expected to take allegations of misconduct seriously and create an environment where individuals who report such incidents are heard, respected, and supported throughout the process. Managers at any level of the organization who have direct observation of an incident or receive a report of misconduct must report such information to any of the Speak Up channels established by Global Fund for Women.

All personnel including individual contributors and Managers receive training on the Code of Conduct and our Speak Up, Listen Up, and Investigation processes.

Channels for asking questions and reporting concerns

We approach every concern with the utmost seriousness and confidentiality, valuing the courage it takes to speak up. If you suspect any wrongdoing by Global Fund for Women, its leadership, or others on its behalf, report it. Report safeguarding concerns, financial irregularities, and other misconduct including violations of law or policy related to Global Fund for Women's operations. You can report to your supervisor, any member of the Executive team, or to the Senior Director of Integrity and Compliance. You can also report confidentially to concerns@globalfundforwomen.org and anonymously and confidentially to the third-party managed Speak Up Line: <https://globalfundforwomen.navexone.com/>

Speak up here: <https://globalfundforwomen.navexone.com/>
or send an email to concerns@globalfundforwomen.org

Anonymity and Confidentiality

We encourage individuals to provide their names when raising concerns to foster transparent communication and ensure comprehensive support. This allows responders to contact you if additional information is required. Naming yourself also helps Global Fund for Women protect you from retaliation for making a good faith report. In rare cases, disclosure of your identity may be legally required or essential for thorough investigation and resolution.

When reporting through the Speak Up line or other anonymous methods, we strive to maintain your confidentiality, sharing your information only with those directly involved in addressing the issue on a need-to-know basis. If you choose to remain anonymous, please provide detailed information. Our Speak Up line, EthicsPoint, is managed by NAVEX Global, a third-party vendor ensuring a robust and confidential reporting system for our employees, partners, and the communities they serve, aligned with our intersectional feminist principles.

Upon reporting via the Speak Up line, EthicsPoint will assign you a case number. Regularly check the site to respond to further information requests from those addressing your concern. Insufficiently detailed reports may lead to case closure.

Whistleblower Protection

Global Fund for Women is committed to fostering a safe and inclusive environment and will not tolerate retaliation against anyone who, in good faith, reports a concern or participates in an investigation.

Regardless of position or tenure, anyone found to have engaged in retaliatory conduct against someone who has raised an ethical or compliance concern will face disciplinary action. If you feel you have been subjected to retaliation, you are encouraged to report it through the Speak Up line or directly contact the Senior Director for Human Resources or Senior Director of Integrity and Compliance.



In addition to the Global Fund for Women's prohibition on retaliation, U.S. federal law also protects against any form of retaliation for disclosing information that is reasonably believed to be evidence of gross mismanagement or waste of federal funds; abuse of authority related to a federal grant, cooperative agreement, or contract; substantial and specific danger to public health or safety; or violations of law, rule, or regulation concerning federal funding. If you believe you have faced retaliation for a good faith disclosure of such conduct, you have the right to submit a complaint to the Inspector General of the appropriate U.S. federal agency.

Our commitment is grounded in intersectional feminist values, ensuring all voices are heard and protected, and promoting a culture of accountability and support for everyone involved.

Cooperation and Responsiveness

At Global Fund for Women, all concerns are taken seriously and will be thoroughly addressed. Personnel are expected to cooperate with any internal review or investigation. Depending on the nature of the concern, investigations of Code or other policy violations will be led by the Senior Director of Integrity and Compliance, Senior Director of Human Resources, or Vice President of Finance, in coordination with other business teams, legal counsel, or third-party experts as needed, all while maintaining confidentiality.

To respect the privacy of individuals affected by a report, Global Fund for Women may be unable to share detailed results of an investigation or disclose specific actions taken in response. However, whenever practicable, we will provide appropriate status updates. Our approach is rooted in intersectional feminist principles, ensuring

transparency, accountability, and respect for all individuals involved. See Global Fund for Women's [Speak Up, Listen Up and Investigation Workflow and Procedures](#) for more.

Violations

Global Fund for Women will take appropriate action against any team member found in violation of the Code or other policies. Such actions may include immediate termination of appointment, employment, or contract at the Fund's sole discretion. Additionally, violations may lead to civil or criminal penalties beyond the organization's discipline. Our commitment to upholding ethical standards and policies is unwavering, guided by intersectional feminist values to ensure a fair and just environment for all.

Practical Application

Q: I understand that I am to report violations of Global Fund for Women's policy and the law. However, I don't want to be seen as a snitch, and I don't want to get my colleagues in trouble.

A: The rule is "Speak Up!" Upholding Global Fund for Women's high ethical standards is everyone's job. A manager may not be aware of inappropriate or unethical conduct, so you have a duty to report anything that you think may be inappropriate or a violation of this Code. If reporting to your manager puts you in an uncomfortable or high-risk situation, then you must report it through any of Global Fund for Women's Speak Up channels.

Q: What if my supervisor is involved in what I perceive to be misconduct? What should I do? If I say something, I will get fired or, worse, my worklife will be made miserable until I quit.

A: Global Fund for Women protects its employees with a strong policy regarding whistleblower protection and non-retaliation. Raising your concerns is part of being ethical, part of being a leader, part of being respectful to our stakeholders, and part of being accountable. If you do speak up you will be protected from retaliation, both by our Code and by applicable law.

COMMITMENT TO PROMOTING WELL-BEING AND PREVENTING HARM

Gender Justice

At Global Fund for Women, our commitment to promoting well-being and preventing harm is deeply rooted in the pursuit of gender justice. We recognize that achieving true equity involves addressing systemic inequalities and dismantling oppressive structures that disproportionately impact women, girls, and marginalized genders. Gender justice means creating an environment where everyone can thrive, free from violence, discrimination, and exploitation. We strive to implement policies and practices that protect the well-being of all individuals and communities we serve, ensuring that their voices are heard, and their rights are upheld. Our dedication to gender justice is integral to fostering a safe, inclusive, and equitable world for everyone.

Safeguarding

Global Fund for Women sees harassment, abuse, and exploitation as manifestations of power imbalances that are deeply rooted in inequitable gender dynamics. These dynamics are compounded across multiple identity dimensions, including age, disability, nation of origin, socioeconomic status, race, or religious beliefs.

We define safeguarding as the **policies, practices, and organizational culture in place to prevent all forms of physical abuse, emotional abuse, sexual abuse, neglect, and commercial and other exploitation that results in actual or potential harm or arising as a direct result of coming into contact with our personnel or third-party partners.** This includes a responsibility to prevent inaction or inadequate action or response by Global Fund for Women personnel and Board Members in the face of harm.

This means we take all reasonable steps to prevent harm and respond appropriately whenever safeguarding concerns are raised. The people and some of the issues we include are:

- Adult safeguarding adopts a feminist, intersectional approach, recognizing the compounded vulnerabilities related to disability, age, and health to protect those at heightened risk of harm.
- Child safeguarding involves adopting of a feminist intersectional approach to taking proactive measures to prevent all forms of harm, abuse, and neglect to any person below the age of 18 years.

- Protection from sexual exploitation, abuse, and sexual harassment (“PSEAH”); and other forms of harm, including physical abuse.
- Prevention of abuse and exploitation within the workplace.
- All forms of modern slavery, including human trafficking resulting from our work.

Global Fund for Women’s safeguarding standards fall within cycled principles of safeguarding aimed at reducing opportunities for harm and abuse to arise. Read more about our Safeguarding principles and standards in Global Fund for Women’s [Safeguarding Policy](#).

Child Protection

Child protection is generally defined as the prevention of and response to abuse, neglect, exploitation, and violence against children. This includes identification of risks, implementation of prevention and mitigation activities, and survivor-centered response to abuse, neglect, exploitation, and violence. A child protection concern is NOT a safeguarding issue when the situation is caused by factors external to Global Fund for Women programming. Global Fund for Women has adopted the United Nations definition of child. The UN defines a “child” as any human being below the age of 18 years. This definition aligns with the Convention on the Rights of the Child [CRC], which is a widely ratified international human rights treaty.

Global Fund for Women commits to:

- Encouraging Open Dialogue: Creating safe spaces for children to express their feelings and thoughts about their involvement in a Global Fund for Women funded activity, ensuring they feel heard and validated.
- Providing Educational Resources: Providing accessible, age-appropriate educational materials that empower children with knowledge and coping strategies related to the topics discussed.

- Empowerment through Participation: Inviting children to participate in workshops or forums where they can learn about their rights, develop self-advocacy skills, and understand how to access support when needed.
- Building Resilience: Focusing on resilience-building activities that equip children with the confidence and skills to navigate challenging topics, fostering a sense of empowerment and agency.

To protect children from harm and ensure the integrity of our work, Global Fund for Women is committed to the following minimum standards. These standards apply to personnel regardless of whether they are on or off the clock and to third-party partners and visitors. Any violation of these standards is a serious concern and will result in disciplinary action. As such:

- Treat children with respect regardless of race, color, sex, language, religion, political or other opinions, national, ethnic or social origin, property, disability, birth or other status.
- Use language and behavior towards children that is appropriate, respectful, and culturally sensitive, avoiding any form of harassment, abuse, or sexually provocative conduct.
- Engage with children in a manner that respects their boundaries and never involves any form of sexual activity or acts, including paying for sexual services.
- Do not invite unaccompanied children into your place of residence.
- Do not sleep close to unsupervised children.
- Do not exploit or harass children.
- Do not access child pornography.
- Refrain from physical punishment or discipline of children that are not your own.
- Comply with all relevant legislation, including labor laws in relation to child labor.
- Do not photograph or film a child for non-work-related purposes.

- When photographing or filming a child for work-related purposes:
 - Comply with local traditions or restrictions for reproducing personal images,
 - Obtain written informed consent from the parent or guardian of the child before photographing or filming, explaining how the photograph or film will be used,
 - Ensure photographs, films, videos, and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive manner,
 - Ensure children are adequately clothed and not in poses that could be seen as sexually suggestive,
 - Ensure images are honest representations of the context and the facts,
 - Ensure file labels are not revealing identifying information about a child.

The standards set out above are not an exhaustive list. Other types of exploitative or abusive behavior towards children may be grounds for administrative action or disciplinary measures. Additional guidelines may be found in Global Fund for Women's [Ethical Storytelling Guidelines](#).



Anti-Sexual Exploitation and Abuse

To safeguard the health and safety of the people we work with or who work for us, personnel and third-party partners are prohibited from engaging in abusive or exploitative behaviors. While Global Fund for Women prohibits abusive or exploitative behaviors, sexual exploitation and sexual abuse constitute acts of serious misconduct and are therefore grounds for disciplinary measures, including summary dismissal in the case of employees or Board Members, or termination of contracts in the case of all others. As such:

1. Sexual exploitation and abuse by Global Fund for Women representatives 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 in the age of the 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 the exchange of assistance that is due to program participants, as funded through Global Fund for Women.
4. Sexual relationships between participants of programs funded by Global Fund for Women and Global Fund for Women representatives or its third-party

partners are strongly discouraged. Such relationships take place in the context of unequal power dynamics and thus undermine the credibility and integrity of our work. Should a sexual relationship occur between participants and Global Fund for Women representatives or its third-party partners, the occurrence should be disclosed to the relevant Safeguarding Lead or reported in line with the reporting procedures included herein.

5. Where personnel develop concerns or suspicions regarding sexual abuse or exploitation, they must report such concerns via established reporting mechanisms.

Personnel are obliged to create and

6. maintain an environment that prevents sexual exploitation and sexual abuse. Managers at all levels have a particular responsibility to support and develop systems that maintain this environment.

Disability Justice

At Global Fund for Women, our commitment to promoting well-being and preventing harm includes a steadfast dedication to supporting persons with disabilities. We understand that achieving true equity requires recognizing and addressing the unique barriers and challenges faced by individuals with disabilities. Our approach is rooted in the belief that everyone deserves to live free from discrimination, violence, and exclusion. By implementing inclusive policies and practices, we aim to create an environment where persons with disabilities can fully participate and thrive. Upholding the rights and dignity of individuals with disabilities is essential to our mission of fostering a safe, inclusive, and equitable world for all.

Racial Justice

We recognize that systemic racism and racial injustice are significant barriers to achieving true equity and well-being for all. Our approach involves actively challenging and dismantling structures and practices that perpetuate discrimination and harm individuals and communities. We understand that these challenges intersect with other forms of oppression, including sexism, homophobia, ableism, and classism. As a feminist organization, we are committed to an intersectional approach that acknowledges and addresses the multiple, overlapping ways in which discrimination and marginalization affect individuals.

We strive to create an inclusive environment where people of all backgrounds can thrive, free from discrimination and prejudice. This commitment extends to ensuring that our policies, practices, and partnerships reflect our values of equity and inclusion. We actively work to elevate diverse perspectives and voices, particularly those from communities historically marginalized by systems of oppression.

Upholding these values is crucial to our mission of fostering a safe, inclusive, and equitable world, ensuring that everyone's rights and dignity are respected and protected. We hold ourselves accountable by regularly assessing our impact, seeking feedback from those we serve, and continuously learning and adapting our practices to better align with our values.



Anti-Trafficking

Global Fund for Women unequivocally opposes all forms of human trafficking, recognizing it as a heinous crime that violates fundamental human rights. We are committed to mitigating the risk of trafficking in persons across all our operations, initiatives, and activities involving employees, interns, volunteers, independent contractors, contractors, and grantee partners. In addition to prevention efforts, we recognize our responsibility to empower survivors of human trafficking by offering meaningful employment opportunities as part of their recovery and reintegration

Global Fund for Women strictly prohibits:

- Engaging in any form of human trafficking
- Using forced labor of any kind, for any reason
- Destroying, concealing, confiscating, or otherwise denying access to an employee's identity or immigration documents
- Using misleading or fraudulent recruiting practices
- Charging employee candidates recruitment fees for employment
- Failing to pay contractually agreed return transportation costs for certain employees who have finished employment outside their home country
- Providing or arranging housing that fails to meet the host country's housing and safety standards
- Failing to provide an engagement letter or signed contract before engaging personnel

Our commitment to combatting human trafficking is integral to our mission of promoting well-being and preventing harm, ensuring that all individuals are treated with dignity and respect.

Ethical Storytelling

We tell stories to propel gender justice:

We tell movement stories from a **place of strength and power**, not deficit.

We collaborate with movements to **tell stories on their own terms** (how we tell the story, where we share, when we post).

We speak to support movements; we don't speak for them.

Our communications strategies **are non-exploitative and grounded in our values.**

We are nimble; we know language is always changing and we actively seek input from our network and the broader landscape to refine how we speak about gender justice as our understanding develops.

Additional Ethical Storytelling principles and guidelines may be found in [Global Fund for Women's Ethical Storytelling Guidelines](#).

Practical Application

Q: I was sent a link to a media campaign run by the committee advancing a Global Fund for Women-supported MLA. The article shows a video of an interview of a child and an article which discloses enough details to identify that child. The MLA advisor confirmed that the girl is easily identifiable by the members of the community. However, the team shares that they received approval from the girl's family to do the interview. Is this OK?

A: No. Global Fund for Women has strict child protection guidelines that prohibit Global Fund for Women, movements actors, and grantee partners from publishing enough information to identify or make contact with a child. Global Fund for Women also does not allow for publication showing faces of anyone under the age of 18.

COMMITMENT TO THE MOVEMENTS

Movement Actors and Funded Partners

At the heart of our mission is our unwavering commitment to the gender justice movements we support. Our funded partners are the trailblazers and change-makers driving transformative, intersectional progress across the globe. They are grassroots activists, community organizers, and visionary leaders who embody bold and ambitious approaches to justice and equity.

Our partnership goes beyond mere financial support. We believe in the power of flexibility and autonomy, allowing our partners to define their own priorities and strategies. By providing unrestricted funding, we enable them to adapt to emerging challenges and opportunities with agility and resilience.

We also invest in the collective strength of our partners through initiatives that foster feminist peer learning, collaboration, and mutual support. By facilitating convenings and knowledge exchanges, we help bridge connections among activists, amplify diverse voices, and cultivate a robust ecosystem of shared resources and expertise.

Our commitment is to nurture and sustain the movements that are reshaping our world. We stand with our partners as they craft solutions that reflect their lived experiences and visionary aspirations, ensuring that the change we create together is profound, lasting, and meaningful for generations to come.





Other Stakeholders

We are committed to advancing gender justice that extends beyond financial support to embrace a wide spectrum of stakeholders dedicated to transformative progress. From policymakers and academics to advocates and philanthropists, we collaborate closely with a diverse community united in driving intersectional change on a global scale.

Together, we empower stakeholders to define their own paths forward. Through flexible funding and strategic guidance, we enable swift adaptation to emerging challenges and the seizing of opportunities with resilience and determination.

Central to our approach are initiatives that foster collaboration, peer learning, and mutual support among stakeholders. By facilitating dialogues and knowledge exchanges, we amplify diverse voices and cultivate a robust network of shared resources and expertise.

Our collective goal is to nurture and sustain movements that redefine our world. By standing shoulder to shoulder with stakeholders across sectors, we strive for enduring, impactful change that reflects the richness of lived experiences and inspires a future anchored in justice and equity.

COMMITMENT TO GLOBAL FUND FOR WOMEN



Equity, Inclusion, Diversity, and Belonging

We show up for each other by acknowledging and affirming our chosen identities and expressions of those identities. We honor chosen pronouns and allow space for diversity of religious identity, political identity, and socio-economic status. We are committed to checking our biases and noticing when we make assumptions about each other's experiences based upon our outward presentations.

We are committed to ensuring the well-being and self-determination of everyone we meet and work with. Global Fund for Women is committed to fostering an inclusive and welcoming environment for everyone we interact with regardless of gender identity or expression, sexual orientation, race, ethnicity, nationality, religion (or lack thereof), ability, neuroatypicality, socioeconomic status, or any other visible or invisible identities they may belong to. We recognize and affirm the diversity of our community, including transgender, non-binary, intersex, and gender non-conforming individuals.

While we recognize that every person we interact with will bring to it their own belief systems and lived experiences, we expect that all will embody the values of respect, inclusion, openness, support, and kindness in all interactions so that we can build an intersectional feminist community.

Equal Employment Opportunity

Global Fund for Women provides equal employment opportunity to all individuals regardless of their race, color, creed, religion, sex, gender identity or expression, age, sexual orientation, pregnancy, national origin, disability, veteran or military status, citizenship status, or any other characteristic protected by state, federal, or local law in the United States. Please see the [Employee Handbook](#) for more detail related to EEO.

Non-Discrimination and Preventing Harassment and Bullying

Global Fund for Women is committed to ensuring its work is free of discrimination and harassment. In furtherance of this commitment, the organization strictly prohibits all forms of discrimination and harassment. Specifically, Global Fund for Women prohibits managers and employees from discriminating against or harassing other personnel as well as contractors, consultants, movement actors, grantee partners, and others working with the organization. In addition, Global Fund for Women prohibits contractors, independent contractors, movement actors, grantee partners, and others working with the organization from discriminating against or harassing Global Fund for Women personnel. This includes:

- Treating people with dignity and respect
- Being mindful and conscious of culture, gender, religion, and other visible or invisible differences
- Reporting harassment, bullying, and discrimination against you or another person
- Maintaining confidentiality when complaints are made

Prohibited harassment includes:

- Racial or ethnic slurs, epithets, and any other offensive remarks
- Offensive jokes, whether written, verbal, or electronic
- Threats, intimidation, and other menacing behavior
- Inappropriate verbal, graphic, or physical conduct
- Sending or posting harassing messages, videos, or messages via text, instant messaging, or social media
- Other harassing or discriminatory conduct based on one or more of the protected categories identified in this section of the Code

Please see the [Employee Handbook](#) for more detail related to our anti-discrimination commitment.

Practical Application

Q: My colleague and I recently interviewed a candidate for a new job. The candidate mentioned during the conversation that they had young children. Later in the interview, my colleague asked the candidate how they planned to manage the responsibilities of raising a family with the significant travel burden that this role requires. Was that an acceptable question to ask? What role did I have in that moment and afterwards?

A: No, this is an unacceptable question to ask of any candidate or employee. Global Fund for Women prohibits conduct which has the purpose or effect of creating an intimidating, hostile, or offensive work environment. Furthermore, we base employment decisions only on factors that reflect suitability for a role, such as relevant experience, technical knowledge, and aptitude. In the interview, you should advise the candidate that they do not need to answer the question and move on to the next topic. Afterwards, you should raise this incident with HR so they can retrain your colleague on the anti-harassment policies and how they translate to acceptable interview behaviors.

Q: I supervise several people. One afternoon one of my staff told me that they feel like they are being harassed by another manager. Because they were vague about the details of the events and who did what, should I investigate the situation myself to find out more information before I report the issue?

A: No. You should report the incident to HR immediately. HR will work with you to determine next steps.

Combatting Sexual Harassment

Global Fund for Women aims to foster a work environment centered around mutually respectful conduct. Sexual harassment includes a broad spectrum of conduct, including harassment based on sex, gender, gender identity or expression, and sexual orientation - all of which are not tolerated by the organization. Please see the [Employee Handbook](#) and [Safeguarding Policy](#) for more detail related to sexual harassment.

Drug-free Workplace

Global Fund for Women is committed to providing a safe, quality-oriented and productive work environment, wherever we work globally. Alcohol and drug abuse poses a threat to the health and safety of Global Fund for Women personnel and to the security of any Global Fund for Women equipment. For these reasons, Global Fund for Women is committed to the elimination of drug and alcohol abuse in the workplace.

Whenever Global Fund for Women personnel are working at their workstations or are conducting work globally, they are prohibited from:

- Using, possessing, buying, selling, manufacturing, or dispensing an illegal drug (this includes the possession of drug paraphernalia)
- Being under the influence of an illegal drug while working
- Consuming alcohol to point where they are no longer capable and coherent, any alcohol consumed during a Global Fund for Women sanctioned event must be consumed responsibly.

Please see the [Employee Handbook](#) for more detail related to our drug-free workplace.

Global Safety and Security

Global Fund for Women is committed to minimizing safety and security risks and ensuring personnel and Board Members are provided the information, support, and training they need to reduce their risk exposure while maximizing the impact of our work. It is critical that everyone traveling for Global Fund for Women understands and manages the health, safety, and security risks taken when working on behalf of Global Fund for Women.

- Everyone has an obligation to learn and understand the context and security issues where they are located. Personnel and Board Members must adhere to all pertinent policies and plans concerning safety and security and will be accountable for their actions.
- Personnel and Board Members have the right to withdraw from or refuse to take a work assignment or travel in an area due to health, safety and security concerns.
- Global Fund for Women has the right to suspend activities or withdraw personnel and Board Members from situations that it considers to be too dangerous.
- Personnel and Board Members should not remain in a location if they have been instructed to withdraw from it by Global Fund for Women.
- Effective safety and security management for Global Fund for Women is a leadership function. Managers at each tier of the organization are responsible and accountable for ensuring that safety and security policies, standards, plans, and procedures are followed.

Communication on Behalf of Global Fund for Women

Global Fund for Women encourages sharing information internally and externally for the purposes of gathering information, generating new ideas, and learning from the work of others. It also helps others learn about our work. Social media platforms provide inexpensive, informal, and timely ways to participate in an exchange of ideas and information. However, information posted on a website is available to the public and, therefore, Global Fund for Women has established guidelines governing acceptable social media use. Additional guidelines for brand messaging and logo usage are found in the [Brand Book](#). These guidelines should be followed on all social media posts regarding Global Fund for Women - even posts regarding Global Fund for Women on your personal social media accounts.

Global Fund for Women personnel are powerful ambassadors. We are passionate about the work we do and naturally want to share it with others. But to protect the organization's reputation, we must think carefully about how we communicate. Our [Spokesperson Policy](#) ensures that all external communications align with the organization's values, mission, and strategic goals. The policy designates specific individuals who are authorized to speak on behalf of the organization, including the CEO, Executive Team, and other key leaders. This ensures that our messaging is consistent, accurate, and representative of our organization's stance on various issues.

Avoid disclosing any information about Global Fund for Women or its stakeholders that has not already been approved for external release. A good rule of thumb is to ask yourself whether the information has already been shared publicly through our official communications channels, such as our company website and social media pages. When in doubt, refrain from posting the information.

If approached by reporters, bloggers, or other influencers, only authorized personnel may speak officially on behalf of Global Fund for Women. Personnel who receive a media inquiry should pass the information along to Global Fund for Women's Brand and Communications team immediately. Unless authorized, refrain from engaging with reporters, even with a response like "no comment." For more information on how to be an effective brand ambassador, please review our [Spokesperson Policy](#) and [Ethical Storytelling Guidelines](#), or contact the Brand and Communications team.

Practical Application

Q: I have worked with Global Fund for Women for several years and know a lot about the organization. Recently, a Facebook friend of mine posted an article about us online, and I was quick to respond with my opinions and refute a few of the points the article made, citing my experience and knowledge of Global Fund for Women. Speaking on behalf of the organization is not one of my job responsibilities. Is this okay?

A: No. You should not be speaking on behalf of Global Fund for Women or divulging information online that might be sensitive or confidential. If you identify yourself online as a Global Fund for Women employee, you should also make clear that any opinions or ideas you post are your own—not those of our organization. It does not matter if your comments are positive; taking a stance on issues

related to Global Fund for Women or making comments about our work should be reserved for authorized personnel. Refer this post to the Brand and Communications team.

Q: Who is authorized to speak on behalf of the organization?

A: Designated spokespeople include the CEO, VP of Communications and VP of Programs, and other leaders as determined by the Brand and Communications team. These individuals are trained and briefed on key messages and organizational priorities before any public engagement.

Q: I've been asked by a local news outlet to comment on Global Fund for Women's stance on a recent policy change. Can I provide a statement?

A: No, you should direct the inquiry to the Brand and Communications team, who will coordinate a response from an authorized spokesperson. This ensures that our official position is accurately represented and aligned with our overall strategy.

Q: What should I do if I am approached by the media?

A: Refer any media inquiries to the Brand and Communications team, who will then direct them to the appropriate spokesperson. Personnel are not authorized to speak on behalf of the organization unless explicitly directed by the Brand and Communications team.

Q: A journalist emailed me asking for a quote about our recent work in crisis response. How should I handle this?

A: Forward the email to the Brand and Communications team and let the journalist know that they will be in touch. The Brand and Communications team will ensure that the response is crafted by the appropriate spokesperson.

Appropriate LinkedIn Posts About Employees' Work:

When posting on LinkedIn about our work at Global Fund for Women, it is important to focus on content that highlights achievements, contributions to our mission, and professional milestones. Posts should be celebratory and informative, showcasing the impact of their work while reflecting our organizational values.

Examples of appropriate content include:

- Celebrating major project milestones or successful initiatives led by employees.
- Highlighting speaking engagements, published articles, or thought leadership contributions made by staff.
- Sharing team successes that reflect our commitment to gender justice and social change.
- Recognizing employees who have received awards, certifications, or other professional acknowledgments.



Practical Application

Q: I'd like to post on LinkedIn about my team's recent success in securing a significant grant that will advance our work in gender justice. Is this appropriate?

A: Yes, this is appropriate. But please make sure the post is reviewed by the communications team to ensure it aligns with our messaging and that any sensitive details about the grant are not disclosed. Be sure to focus on the impact of the grant, how it aligns with Global Fund for Women's mission, and celebrate the team's hard work.

Q: How are external communications, such as social media posts, managed?

A: Social media and other external communications are managed by the Brand and Communications team. All content is carefully crafted to ensure it aligns with our organizational values and strategic messaging. Approval from Brand and Communications is required before any sensitive or significant posts are made.

Q: I want to share a success story from our recent campaign on my personal social media account. Do I need approval?

A: Yes, if the story is related to Global Fund for Women's work, it should be reviewed by the Brand and Communications team first. This ensures that all external communications are consistent and align with our organizational messaging.

Use of Global Fund for Women Property

Our stakeholders expect us to use our resources only in support of our mission. Our assets, including funds, computers, other equipment and supplies, and any office space, are to be used only for our mission. Using Global Fund for Women-issued computing devices for personal use is generally not permitted. See the [Employee Handbook](#) for more on the use of Global Fund for Women property including computing devices.

**COMMITMENT TO DATA
INTEGRITY**

Responsible data management

Digital technology used in participant engagement, data collection, and research may introduce digital safeguarding risks for participants related to digital privacy and security and protection of personal data. Global Fund for Women receives data on individuals and organizations through self-registration (ex: donations, newsletter sign-ups), solicitation (ex: surveys, research), and transfers (ex: donor lists, referrals). Our goal is to ensure the safeguarding of information, including both privacy and security practices, with particular attention to personal and sensitive information, and adherence to data minimization principles. Digital tools must meet the basic safeguarding and ethical considerations for ensuring data collection and research is conducted safely and following the principle of 'do no harm' (e.g. informed consent, privacy and confidentiality, safe locations).

Before introducing digital technology and tools, it is essential to consider the risks and benefits of this for all participants and determine whether this technology is necessary and can be used safely. To this end:

- Avoid sharing or publishing staff personal numbers or personal details with participants.
 - Be cautious when interacting with unknown online actors and refrain from accepting contact requests on personal social media accounts.
 - Refrain from storing any data collected on personal mobile devices, USBs, or flash drives. If phones are used for data collection, ensure data is transferred securely and deleted from phones as soon as it is safe to do so.
- Do:**
- Set appropriate boundaries for data collectors and participants; this might include agreement that there is no communication between data collectors and participants outside of agreed hours.
 - Set up password protection and auto-lock on devices.
 - Set up encryption on devices.
 - Set up auto deletion of data after transferring to central database.
 - Encrypt transmission.

Digital Protection and Privacy

At the core of everything we do is rooted in our unwavering commitment to integrity. We comply with all applicable privacy policies, rules, laws, and regulations and build rigorous privacy protections into our funding agreements and, where applicable, program design.

Personal Information should be used only when needed and access to personal information should be restricted only to those who actually need it. We can transfer or share Personal Information only with approved third parties. Such sharing is subject both to our policies and procedures and to contractual obligations. We must be aware of any such obligations.

Personal Information means any information or data that can be used to identify an individual, either on its own or in combination with other information. It can include, but is not limited to, European Union Personal Data, Personally Identifiable Information, Protected Health Information, and Special Categories of Personal Data (sometimes referred to as Sensitive Personal Information).

Seek guidance and take care when working with Sensitive Personal Information or protected data. Protect this information by limiting its use, access, transmission, and storage and by ensuring the appropriate security measures, as described in the referenced guidelines, are in place to protect it at all times.

Please be prepared to speak up and ask questions if you are unsure about a situation or need to report an actual or suspected data security issue or data loss incident. For more on this topic, please consult Global Fund for Women's [Digital Protection Guidelines](#).

Practical Application

Q: One of the consultants supporting a Global Fund for Women MLA is pursuing an advanced degree in their home country. They would like to leverage the work of the MLA and publish a report on their experience with this MLA. The University they will work through requires that such reports be made public. Is this a concern for Global Fund for Women?

A: This is OK so long as two things happen.

1) Personally Identifiable information about movement committee members or other related individuals is not made public without first obtaining written informed consent from each individual.

2) any confidential Global Fund for Women information, or know-how is protected through a formal written non-disclosure agreement (“NDA”) with the University. An NDA would legally bind the university to maintain the confidentiality of any sensitive information disclosed in the consultant’s report. This includes any data, methodologies, or insights that are not meant for public dissemination. The NDA can specify what information can and cannot be included in the public report. This helps ensure that only non-sensitive information is published, while more sensitive details remain protected. See the Senior Director of Integrity and Compliance for more on this.



Confidential Information - intellectual Property

Everyone must be careful to avoid disclosing Global Fund for Women’s confidential or proprietary information to unauthorized persons. Confidential and proprietary information may only be disclosed to a third party under an applicable obligation of confidentiality, such as a non-disclosure or other contractual agreement, and/or with appropriate management approval.

In alignment with our commitment to knowledge sharing, we recognize the importance of respecting the intellectual property rights of others, particularly those belonging to historically marginalized communities. When engaging with knowledge, practices, or cultural expressions originating from these groups, we are committed to obtaining proper consent, giving appropriate credit, and ensuring that our use does not exploit or misappropriate their contributions. We believe that honoring these principles is essential to fostering mutual respect, collaboration, and equity in all our partnerships and initiatives.

COMMITMENT TO OPERATIONAL INTEGRITY

Anti-Corruption

Global Fund for Women takes a zero-tolerance approach to fraud, bribery and other corrupt behaviors. We are committed to this approach in our interventions, activities, and business processes.

Global Fund for Women employs all legal and safe tactics to avoid and resist paying bribes to Public Officials, even if it results in denials, delays, inconvenience, and increased cost to our operations. The same applies to all third parties engaged by the organization, including contractors, movement actors, and grantee partners.

No one is authorized to pay a bribe or request a bribe on behalf of Global Fund for Women or use the organization's name to do the same.

Individuals are not expected to resist bribery to the point of putting themselves or others at real risk of personal harm or injury. A payment under such circumstances is considered extortion rather than bribery.

See the [Anti-Bribery and Corruption Policy](#) for more on this topic.



Practical Application

Q: A contractor in Latin America was told that they could hire a consultant to acquire all the necessary permits needed from this foreign government to register and start a new project. However, the consultant requested a \$5,000 retainer and said that they would use the money to “speed up the process.” Since the Global Fund for Women contractor does not know where the money is going, and is not the one using it, should they say anything to their direct supervisor?

A: The phrase “speed up the process” should raise a red flag as it suggests that the consultant may use this money for a bribe, which is likely prohibited by local law and by this Code. Personnel are required to take steps to ensure this money is not used as a bribe and must seek the advice of management before proceeding with this consultant.

Q: I understand the Code provision about giving or receiving bribes. However, I heard that there is an exception to the rule for small bribes—small bribes are commonly used to get things done in some of the countries where we work, and these small bribes are not illegal. If I really need to get something done, is it ok to pay a small bribe?

A: The short and direct answer is no. Global Fund for Women does not allow for the payment of bribes under any circumstance. Bribes are against the law. The Code requires you to comply with all relevant anti bribery laws and precludes the payment of bribes under any circumstances.



Conflicts of Interest

A conflict of interest exists where an employee, intern, contractor, or Board Member has an interest, relationship, or friendship which could, or could be perceived to, interfere with their ability to decide an issue in the best interest of Global Fund for Women.

The existence or discovery of a conflict of interest does not constitute a breach of policy as long as it is disclosed and mitigated as soon as possible.

In accordance with the organization's Conflict of Interest Policy and Procedures, all actual or potential conflicts of interest are to be declared, these declared conflicts are subsequently managed to mitigate the associated risks, and decisions and actions are documented to ensure transparency and accountability. See the [Conflict of Interest Policy and Procedures](#) for more on this topic.



Practical Application

Q: What if a conflict of interest helps Global Fund for Women or a movement?

A: Even when a conflict of interest might help Global Fund for Women or the movement, the right thing to do is to disclose the conflict and to recuse yourself from any decision making related to the conflict. And of course, document the conflict using the disclosure of relationship form.

Q: I believe I might have a personal conflict of interest with a Global Fund for Women movement committee activity. Is it ok for me to remain engaged since I think I can be objective?

A: The Anti Bribery and Corruption Policy requires that personnel disclose relationships that may be perceived as potential or actual conflicts of interest. Global Fund for Women will review the matter and determine whether recusal is necessary.

Q: In my previous role with another feminist organization, I worked with an amazing advisor who I consider a good friend. Is it ok for me to recruit this person to support Global Fund for Women work?

A: Yes. It is ok to suggest that this person apply for an open consulting or employment opportunity with Global Fund for Women. However, you cannot be part of the review or decision making because of your relationship with this person. You also cannot supervise them or manage their consultancy, if a contractor. To ensure we treat all persons equally and fairly, we will require you to recuse yourself and have other Global Fund for Women staff take responsibility for selection and decision making.

Hiring family or persons known to you

Global Fund for Women does not prohibit employment or engagement of family members or personal relations so long as that individual is not a direct report. Safeguards will be established by the organization to ensure that such employment or engagement does not result in a conflict of interest. See the [Employee Handbook](#) for more on the Employment of Relatives and Domestic Partners.

Gifts, Gratuities, and Business Courtesies

Gifts and entertainment should never be used or allowed to influence business decisions.

When offers of gifts and entertainment are made or accepted in situations where they are not appropriate, they can look like, or may in fact be, bribes. Gifts can expose us to accusations of unfairness, unlawfulness, and risk our reputation among our stakeholders.

We should be able to accept and make offers of gifts and entertainment ONLY when they:

- are proportionate in the context; and
- do not create any sense of expectation or obligation on the recipient or the giver.

Organizations like Global Fund for Women that receive restricted funding are also subject to strict rules regarding gifts to government officials. To ensure compliance with these rules, Global Fund for Women personnel may not offer any business courtesies (such as entertainment or personal gifts) to government employees. However, providing meals or refreshments at business meetings or shared events is permitted, as long as it is done in a transparent manner and in line with our policy. If a government employee requests any other type of business courtesy, respectfully decline, explain that our policy prohibits offering or providing such gifts, and immediately report any such request to the Senior Director of Integrity and Compliance. More on this topic may be found in the [Anti Bribery and Corruption Policy](#).

Practical Application

Q: It's very common for hosts to give gifts like a tote bag, typical garment, or other small local token to Global Fund for Women staff at convenings or other work trips. Is it OK for me to keep such items?

A: While our policy generally prohibits the acceptance of gifts to avoid any appearance of impropriety or bribery, we understand that in certain cultural contexts, refusing a small token of appreciation can be seen as disrespectful. In such cases, it is acceptable to graciously accept small, non-monetary tokens such as tote bags, typical garments, or other local souvenirs, provided they are of nominal value and not intended to influence business decisions.

Political Activities - Participation in Elections

Global Fund for Women does not fund political contributions, in cash or in kind, anywhere in the world. This prohibition includes support of political activity, political parties or their representatives, political campaigns, and candidates or any of their affiliated organizations.

Global Fund for Women personnel have the right to engage as an individual in the political process and make political donations, as long as it is not represented that Global Fund for Women is making the contribution and provided there is no conflict of interest involved. Any questions or concerns about political activities may be directed to your manager, the Senior Director of Integrity and Compliance, or Senior Vice President of Global Operations.

Practical Application

Q: What if I am wearing Global Fund for Women apparel or other Global Fund for Women branded accessories when participating in a political activity?

A: Wearing Global Fund for Women apparel or any other Global Fund for Women branded accessory could be perceived as Global Fund for Women supporting that political event or a political party. Global Fund for Women personnel should not wear branded apparel or accessories when participating in politicized events in their personal capacity. If you are unsure, consult Senior Vice President of Global Operations before participating in a political activity.

Lobbying

Any lobbying activities throughout the world by Global Fund for Women must comply with local, state, and federal laws regarding influencing government policies and government officials. To assure that the organization maintains its non-profit status, it must not exceed the acceptable limits on resources spent on lobbying.

U.S. federal funds (including nonfederal funds used to match federal funding) may not be used to attempt to influence legislation or influence decisions regarding grants and contract awards in the U.S. Further, U.S. federal funds may not be used to influence the outcome of an election, referendum, initiative, or similar procedure in the U.S. or other country, at the federal, state, or local level. Similarly, no funds from the U.K. may be used to attempt to influence legislation in the U.K. No funds from private foundations may be used to attempt to influence legislation anywhere in the world. Please contact the Senior Vice President of Global Operations if you are approached about potential lobbying.



Procurement Integrity

We often submit proposals for funding from various stakeholders. We source funds honestly. Sourcing funds honestly means we avoid overpromising, budget realistically, use donor source selection information and confidential competitor information appropriately, and maintain integrity in our interactions with other Feminist Funds and third parties. We are committed to engaging in agreements and conduct that uphold lawful and fair competition. We are proud to source funds on the merits of our abilities alone.

To meet our mission, we must engage employees, consultants, contractors, grantee partners and movement actors based on objective criteria. Our goal is to hire the most qualified candidates and do business with the best partners and resources, based on ethical hiring and procurement practices that both promote transparency and integrity and comply with applicable laws and regulations. Fair and transparent competition is the basis for the ethical hiring of employees and selection of partners. Consult the [Employee Handbook](#), [Grant Making Policy](#), and [Procurement Policy](#) for more on this topic.

Practical Application

Q: We have relied on the same contractor for years now, so why is Finance asking me to recompet? I've already told them that the quality of the work is superior and we're getting a great deal. Plus, I don't have time to conduct competition; we need to get this contract signed yesterday!

A: Global Fund for Women personnel are accountable to various funders who contribute to the organization. We all must be able to demonstrate to those stakeholders that we are good fiscal stewards of the funds entrusted to us. If you haven't checked prices with other contractors, how do you really know that you are still getting the best value? Reliable internal controls are critical for proper, complete, and accurate accounting and financial reporting. Each of us must follow the Procurement Policy and Procedures related to those controls. In the rare circumstance that there is only a single or sole provider of a good or service, you should carefully follow procedures for sole sourcing.

Fundraising

Global Fund for Women will raise funds in compliance with our Gift Acceptance Policy and be truthful in solicitation materials. We will respect the privacy concerns of individual donors and always use funding we receive consistent with donor intent. We will disclose important and relevant information to potential donors. We commit to transparency and accountability by regularly reporting on the use of funds, and we will comply with all applicable laws and regulations governing fundraising. Any potential conflicts of interest will be disclosed and managed appropriately. Finally, we will ensure proper stewardship and recognition of our donors to honor their support and contributions.

Financial Integrity

We maintain effective controls over financial reporting to ensure a complete and accurate record of our financial transactions. Proper oversight and accountability of Global Fund for Women's assets helps us meet our financial, legal and regulatory obligations, ensuring that we remain a trusted partner and maintain that trust.

Various financial policies provide more information on this topic. These policies should be read in conjunction with this Code and other related policies like the [Anti-Bribery and Corruption Policy](#).

Basic informational data about the organization, such as the IRS Form 990, will be made available on Global Fund for Women's website or otherwise made available to the public. All solicitation materials, financial records, and program reports will be complete and accurate in all material respects. Further, Global Fund for Women will provide comprehensive and timely information to the public, the media, and other stakeholders and will be responsible in a timely manner to reasonable requests for information.

Practical Application

Q: I travel a lot for Global Fund for Women and work hard to get all my expenses reconciled and reported on time. It can get confusing because sometimes a host will pay for my travel, and sometimes I bill it to my personal credit card for reimbursement later. In reviewing my latest personal credit card, I noticed a \$200 credit from a hotel I stayed at during a conference where I was invited to give a presentation. When I checked out, the hotel charged me for the room, so I paid the expense and got reimbursed by Global Fund for Women. I am guessing that the sponsoring agency discovered that the room was charged to their master account and had the hotel credit my card. Since my travel was already reconciled and there are many times my reimbursements don't cover my actual travel costs, can I just keep the credit? After all, who will know?

A: The definition of honesty is doing the right thing even when no one is watching. The fact that probably no one will notice this overpayment does not remove your responsibility to do the right thing. You should reimburse Global Fund for Women the amount of the overpayment of the refund.

Anti-Terrorist Financing

Individuals, companies, and organizations are sometimes subject to restrictions from various donors. Global Fund for Women personnel play an important role in ensuring the eligibility and responsibility of contractors, consultants, movement actors or grantee partners. To qualify as responsible, an individual or organization must have the technical capacity, experience, and ability to work alongside Global Fund for Women. It must further have adequate accounting and operational controls; a satisfactory record of performance, integrity, and business ethics; and must be otherwise qualified and eligible to receive funds from Global Fund for Women. Part of the eligibility determination may include vetting information against established Govern-

ment and International Organization databases. It is our responsibility to comply with these requirements to prevent engagement with terrorists, criminals, and other prohibited entities or individuals. [The Grantmaking Policy and Procedures](#) and [Procurement Policy and Procedures](#) provide more information on our vetting and excluded party's verification process.

Records Management

We are responsible for ensuring that the organization's records are prepared accurately and honestly. Records must be supported by enough documentation to provide a complete, accurate, valid, and auditable trace of each transaction. This includes documentation regarding contracts, purchases, expenses, and all activities related to fulfilling our mission. Fair and accurate records are essential for managing our activities and maintaining the accuracy and integrity of our financial reporting and disclosure.

- Do not alter documents to conceal, exaggerate, or falsify information;
- Approve payments only if they are for an authorized purpose and supported by adequate documentation; and
- Never destroy documents in a manner that violates the Fund's document retention policy.

All Global Fund for Women records must accurately and fairly reflect our transactions in sufficient detail and in accordance with our established policies, procedures and practices. Some employees have special responsibilities in this area, but all of us contribute to the process of recording operational results or maintaining records.

Our reporting and record-keeping should accurately reflect our activities and always be aligned with our accounting and record-keeping processes and the law. Global Fund for Women will not tolerate dishonesty, including false recordkeeping. Global Fund for Women personnel should come forward with any concerns pertaining to questionable accounting, financial reporting, timekeeping, expense reporting, or auditing matters. If anyone, including a manager, instructs you to make an inaccurate record or report, you should speak up immediately and communicate your concerns to the Vice President of Finance or any of the various reporting options in this Code. Various financial policies, [The Grantmaking Policy and Procedures](#), and the [Procurement Policy and Procedures](#) provide more information on records management.

ENFORCEMENT

Anyone who violates Global Fund for Women's Code or any Policies and Procedures, regardless of position or tenure, will be subject to disciplinary action, up to and including termination.

The severity of the disciplinary action will depend on the nature of the offense, any prior conduct history, the veracity of the facts, and other relevant factors. Potential disciplinary measures include mandatory additional training, verbal or written warnings, and, as a last resort, termination.

Furthermore, violations of laws or regulations may result in legal action against individuals, colleagues, Global Fund for Women, or its stakeholders (including contractors, movement actors, and grantee partners), potentially leading to fines, activity suspension, debarment, or imprisonment.

Global Fund for Women personnel are required to sign a statement confirming their understanding of and commitment to this Code. Everyone will sign the Acknowledgement Statement upon induction and whenever the Code is updated, or as determined by the organization.

ACKNOWLEDGEMENT

As emphasized in Global Fund for Women’s Code of Conduct, our work is grounded in the spirit of justice, equity, and the highest ethical standards. Upholding these principles requires a collective commitment from each of us to foster a respectful and inclusive environment.

By signing this form, I affirm the following:

- I have read and understand the principles and policies outlined in Global Fund for Women’s Code of Conduct.
- I commit to adhering to the standards of conduct described in the Code and related policies.
- I will complete all required training on ethics and compliance topics, recognizing the importance of continual learning and growth.
- I will use the resources listed in the Code to speak up if I have any doubts about the proper course of conduct or if I become aware of potential violations of our standards or the law.
- I will report any situation involving a conflict or perceived conflict of interest, as described in the Code and related policies, through the appropriate channels.
- I will fully cooperate in internal and external audits and investigations by providing truthful information and preserving all relevant materials.
- I understand that violating the law, our Code, or related policies may result in disciplinary action, in accordance with local laws and internal procedures.

Our organization is dedicated to fostering a culture rooted in transparency and accountability. We will not tolerate retaliation against individuals who courageously raise concerns about legal violations, our Code of Conduct, or related policies.

Name: _____

Signature: _____

Date: _____

**Global Fund for Women
Code of Conduct - 2024**