



# Ethics & Anti-Harassment Training (2019)



# Agenda

1. Review of DAI's Business Code of Conduct and Anti-Harassment Policy
2. Conversation Starters
  - Large group discussion
3. Case Studies
  - Small group discussion
4. Training & Code of Conduct Certifications

DAI's *Code of Business  
Conduct & Ethics* and Anti-  
Harassment Policy

# DAI's Code of Business Conduct and Ethics

## Corporate Values:

- Integrity
- Responsibility
- Excellence
- Global Citizenship



DAI Code of  
Business  
Conduct  
and Ethics



[www.dai-global-conduct.com](http://www.dai-global-conduct.com)



"If you see something, say something." In every incident of fraud, conflicts of interest or bribery, someone takes the initiative to report their concerns. Taking personal responsibility to report is your duty as a DAI employee.

DAI recently conducted a review of significant incidents of fraud, sexual harassment and kickbacks to identify practices that must be strengthened. Many of the recommendations are reflected in the case study take-aways in this issue. We recognize that saying something when you see something can be difficult. To encourage you to report:

- DAI expects supervisors, COPs, Team Leaders and Home Office Managers to be receptive and respectful in listening to your concerns and the details of the allegation. They must also preserve the confidentiality in which the information is provided and your identity if you are concerned about vulnerability to retaliation outside the DAI workplace. They are also expected to pass allegations of ethical violations to the Team Leader, Chief of Party (their deputies) or directly to the ECO to assure a timely response.
- DAI has a strict non-retaliation policy. We recognize the concern employees have about possible retaliation outside of the workplace. DAI will protect your identity to insulate you from this vulnerability.
- Don't wait thinking that someone else may have reported the issue. Your perspective on the allegation will be important to the timely investigation and resolution of the matter.
- Raising the issue quickly will help prevent the problem from developing into something worse.

If you believe performance has been falsified, please

## Procurement Fraud

### Case Study I

A review of bank reconciliations found irregularities in electronic payments made by the project. A project associate noticed multiple payments to a single bank account and contacted her supervisor and the Ethics & Compliance Officer. The associate was already suspicious because she recognized that the DCOP was able to approve requests, sign procurements and authorize payments.

#### Action taken:

A quick investigation revealed that the DCOP inflated the number of consultants needed from two to five with the names of fake individuals. He was also forging the COP's approval and funneling payments for the falsified consultants to his own bank account. A second manager confessed to colluding with the DCOP to inflate the number of consultants. Criminal charges have been lodged. The former employees will be debarred from working on any projects funded by the client.

**What would be your concerns regarding inadequate separation of duties on a project? What can be done to limit the risk of procurement fraud under these circumstances?**

#### Take-aways:

- Be alert to fraud indicators (e.g., signatures that appear duplicated by machine or forged and vulnerability to internal control weaknesses).
- Clear separation of duties is essential. Workload is not an excuse to limit controls or take short-cuts. Address internal control issues quickly.
- Quality of the relationships on the project and with the home office must support a comfort level in reporting concerns and allegations as well as enforcement of policies and procedures.
- Understand the consequence of committing fraud are firing, ruined reputation and criminal charges.

Issue 7  
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# No Harassment Policy at DAI

DAI's work environment must be free of all harassment based on gender, race, religion, ethnicity, color, national origin, ancestry, citizenship, age, physical or mental disability, pregnancy, childbirth or related medical condition, marital or veteran status, sexual orientation, or any other basis protected by law, ordinance, or regulation.

# What is Harassment?

## Harassment can be:

- Verbal communication (in-person, electronically via email, social media or chat apps)
- Non-verbal communication
- Visual (images, posters, etc.)
- Physical conduct
- Threats
- Retaliation

## Harassment does:

- Create an intimidating, hostile or offensive work environment
- Unreasonably interfere with an individual's work performance
- Adversely affect an individual's employment opportunities

# What is NOT Harassment?

- Constructive performance feedback
- Asking a coworker for a date and accepting “No” as an answer
- High fives, fist bumps, shaking hands if culturally appropriate

Beware when:

- An individual is the direct supervisor or has seniority in a reporting line
- Behavior is culturally questionable

**BE PREPARED TO CALL-OUT THE BEHAVIOR AS INAPPROPRIATE!**



# DAI's Non-Retaliation Policy

- Anyone may submit a good faith concern or complaint regarding ethics or compliance without fear of dismissal or retaliation of any kind.
- DAI will not discharge, demote, suspend, threaten, harass, or in any manner discriminate against any person in terms and conditions of employment based upon any lawful actions that person may take in making a good faith report of ethics or compliance concerns.
- Supervisors are expected to listen to allegations in a respectful manner.

# HOW TO REPORT ETHICS ISSUES AT DAI

At DAI, you have **ethical issues**, question and concerns



CONTACT THE ETHICS & COMPLIANCE OFFICER (ECO) AT [ethics@dai.com](mailto:ethics@dai.com), or

Mike Walsh at [mike\\_walsh@dai.com](mailto:mike_walsh@dai.com) or call +1-301-771-7998 skype Michael.f.walsh

NATIONAL  
HUMAN  
TRAFFICKING  
HOTLINE

24/7 Toll free  
Confidential  
200+ languages

GET HELP

REPORT TRAFFICKING

CALL  
1-888-373-7888

TEXT  
"BeFree" (233733)

EMAIL  
[help@befree.org](mailto:help@befree.org)



Talk with your supervisor, manager  
Chief of Party or their deputy.

Reach out to  
management,  
**Human Resources**,  
or other project  
support staff.



Call the Ethics Hotline anonymously  
at +1-503-597-4328 or  
[www.dai.ethicspoint.com](http://www.dai.ethicspoint.com).

Alert USAID's OIG Hotline at  
[ighotline@usaid.gov](mailto:ighotline@usaid.gov) or  
visit <https://oig.usaid.gov> or call +1-  
202-712-1023.

All reports ultimately go through the Ethics & Compliance Officer for review and next steps.

# WHAT HAPPENS WHEN DAI RECEIVES AN ETHICS REPORT ?

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The typical investigation process is as follows:



## 1. ECO Review

Ethics & Compliance Officer reviews the matter in consultation with HR, internal audit, contracts, and legal.



## 2. Investigation

ECO assesses the evidence. If there's credible evidence of fraud, bribery, conflict of interest, or other ethical failure, the ECO notifies the client.



## 3. Client Notification

ECO informs the client of the outcome of the investigation as well as corrective actions.



## 6. Reporter Informed

ECO informs reporter how DAI responded.



## 5. Lessons Learned

DAI adjusts policies and practices to minimize risk in the future.



## 4. Action Taken

DAI management takes appropriate action, potentially including disciplinary measures in accordance with labor law.

# Europe Home Office Points of Contact



**Jeremy Finch**  
Director, Internal Audit & ECO  
DAI/Europe



**Amanda Page**  
Director, HR  
DAI/Europe



**Helle Weeke**  
Senior Vice President &  
General Counsel  
DAI Global



**Mike Walsh**  
Chief Ethics &  
Compliance Officer  
DAI Global



**Another**



**Another**



**Another**



**Another**

# USG Home Office Points of Contact



**Mike Walsh**  
CECO



**Helle Weeke**  
Senior Vice President &  
General Counsel



**Sonja Lichtenstein**  
Senior Manager  
Project HR Services



**Kristina Mascelli**  
Manager  
Project HR Services



**Franca Rofe**  
Senor  
Director, HR



**PTD**



**Project Manager**



**Internal Audit**

# Conversation Starters



Select only a few slides that  
are most relevant to your  
activities and risks.

The slides may be edited to assure they are most appropriate for your  
audience.



Customs Officer:

“Your Yellow Fever card is expired. You cannot enter the country, unless we can work this out....”



Vehicle Checkpoint:

“You must pay \$50 if  
you wish to pass!”

## Co-workers chatting over coffee:

“My husband just applied for the IT advisor position. Don’t tell anyone that he’s my husband. I want to avoid the appearance of a conflict of interest.”



Deputy Chief of Party to an  
employee:

“Look, I told you before, I don’t  
want to hear it. Unless you can  
give me proof, I don’t want to  
hear it!”



Deputy Office Director talking to recruiter after an interview with the candidate:

“I don’t need to conduct any more interviews. I think she’ll do fine in the role. Plus, we’ll have another pretty smile in the office.”





## DAI Colleagues discussing an incident:

“He already had a few drinks when I arrived at the gathering. He kept insisting that I join him. I was really uncomfortable! And now I keep getting text messages from him.”



Supervisor to employee:

“There’s no need to report. We found it and stopped it, so no fraud, right?”



Supervisor to employee:

“I know you worked for one of our competitors. Let me be clear, nobody should ask you for proprietary information about your previous employer. We don’t do business like that at DAI.”



A DAI supervisor and employee discussing next steps:

“Why don’t we ask the beneficiaries? They may have additional thoughts about the problem and possible approaches.”



DAI project employee:

“I don’t know what to do!  
If I say something, nobody will  
believe me because he’s the boss  
and he’s a close friend of the  
Chief of Party.”



Two women speaking to each other:

“I’m telling you because you’re my friend, but I don’t want this to get out because if he loses his job, he’ll certainly come after me. Please don’t say anything to anyone else on the project.”





Supervisor to an  
employee:

“Do you really want to report that? If that gets reported to the client, we’ll be thrown off the project, so think very carefully before taking this any further.”



# Case Studies



# Instructions

1. Your Session Leader will place you in small groups and provide you with 1-2 case studies.
2. In your group, read through the case studies and discuss the questions at the bottom.
3. Be prepared to present back to the larger group about your case studies and your responses to the questions.
4. Summarize the discussion by offering take-away lessons from the case discussions.

**20  
minutes**

**10  
minutes /  
group**

**5-10  
minutes**