

Global Code of Conduct & Ethics



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MESSAGE FROM THE CEO

CHAI's mission is to save lives by helping people gain access to essential medicines and health services. Over the past decade, CHAI has worked in partnership with governments to bring transformational changes that address some of their most intractable global health problems, first focusing on the HIV/AIDS pandemic and later expanding to address malaria, vaccines, maternal and child health, and human resource and health systems challenges.

CHAI has always been and must remain an entrepreneurial, mission driven organization. We have been successful because we recruit people committed to the urgency of our mission and give them the latitude to innovate and challenge the *status quo*. Yet our ability to continue to advance this mission hinges on strong and trusting relationships with our partners and the patients and governments we serve. Governments will trust CHAI so long as we help them be successful in addressing their challenges and we act in a cooperative and respectful manner in their countries. Donors will continue to support CHAI if they trust us to be effective in our work and good stewards of their resources.

As our organization grows, we must balance our entrepreneurial, decentralized management philosophy with effective and efficient management systems to ensure that we are compliant with all laws in each country where we work and are operating with impeccable financial control. This Code is an important part of this effort. It defines the "CHAI way" of doing business, ensuring that everyone is aware of and can be held to the highest professional standards no matter where they work or how long they have been with CHAI. This common baseline strengthens managerial accountability, which is the foundation of our decentralized operating model.

I ask each member of the CHAI community to make a personal commitment to adhere not only to the letter of this Code, but also to its spirit. With our dedication to our values and compliance with the Code, we can ensure that CHAI continues to be dynamic and impactful while living up to our commitments to our donors, our colleagues and most importantly, to the people we serve.

Thank you for your commitment to our mission, values and the CHAI community.

Ira C. Magaziner
Chief Executive Officer
Clinton Health Access Initiative (CHAI)

PURPOSE & GUIDING PRINCIPLES

The Global Code of Conduct & Ethics (**Code**) defines expectations for individual and organizational conduct at the Clinton Health Access Initiative (**CHAI**). It sets CHAI-wide standards for workplace behavior and explains the procedures and consequences when these standards are not met. The Code supplements our shared values, ensuring that every member of our diverse, multinational CHAI community understands how we treat colleagues, partners, resources and, most importantly, the people impacted by our work.

This Code applies to all CHAI employees, volunteers and contractors (together, **CHAI Staff**), and all CHAI Staff are required to adhere to it as a condition of CHAI service. This Code does not constitute an employment contract with CHAI employees. It is subject to, and does not change the terms of, existing CHAI employment contracts.

As a U.S.-based organization, certain U.S. laws apply to the activities of CHAI Staff regardless of location. When local laws are in conflict with this Code, guidance should be sought from the appropriate member of CHAI's Senior Leadership team (**SLT**). In all cases, the Code is the minimum level of compliance required and should guide all CHAI conduct and decision-making.

The SLT has adopted this Code and must approve all revisions. This Code will be reviewed on an annual basis and will be recirculated to the entire CHAI community with all changes/additions highlighted. Questions regarding Code content should be directed to CHAI's [Safety Officer](#).

Individual Responsibility and Accountability

Each CHAI Staff member is responsible for implementing the Code. CHAI's open-door policy encourages CHAI Staff members to share their questions, concerns, suggestions, or complaints about individual or organizational activities with a member of CHAI management without fear of retaliation or harassment. In most cases, a manager is in the best position to address an area of concern. However, if uncomfortable speaking with your manager or if unsatisfied with your manager's response, contact any member of the SLT or submit a concern via the CHAI Helpline. See "[Reporting Concerns & the CHAI Helpline](#)" for more information about the procedures and protections afforded to those who report concerns.

While all CHAI Staff share responsibility to abide by and monitor adherence to the Code, CHAI managers have leadership responsibilities related to the Code. Each manager is expected to:

- Reinforce the Code and make sure their team understands expected behavior
- Seek to personify the values and conduct in the Code, reinforcing them in action and word
- Create an open environment where everyone is comfortable raising questions and concerns
- Immediately escalate any known or suspected violation or other unethical/unlawful behavior to the Executive Vice President for Human Resources (**EVP for HR**). Failure to report violations may result in disciplinary action, up to and including termination of employment.

CHAI VALUES

- *We are driven by our mission to save lives.*
- *We work with urgency.*
- *We work in cooperation with & at the service of partner governments.*
- *We recognize our staff is our greatest asset.*
- *We are frugal.*
- *We operate with humility.*
- *We operate based on trust.*
- *We have an entrepreneurial and action-oriented culture.*

CREATING AND MAINTAINING A RESPECTFUL WORKPLACE

Professional & Respectful Conduct

- *Promote a respectful and professional working environment consistent with our shared values*
- *Treat all colleagues, partners, donors and the public in a fair and consistent manner, with respect and dignity, and free of favoritism, prejudice, insensitivity and discourteous language*
- *Observe and respect local laws and customs, making extra effort to learn and respect local customs when outside of one's home country*
- *Keep confidential all sensitive information, whether marked as such or if it can be reasonably assumed to be sensitive, whether it pertains to CHAI colleagues, partners or third parties, and adhere to each government's patient privacy and confidentiality requirements*
- *Avoid any conduct that compromises CHAI's integrity. Giving or accepting bribes or unauthorized gifts is strictly prohibited*
- *Do not make any decisions that could undermine the safety, health and well-being of yourself and/or your colleagues*
- *Avoid behavior or activities that could damage the neutrality and/or reputation of CHAI*

Diversity & Equal Employment Opportunity

All CHAI employment decisions are based on merit and performance. Under no circumstances should a candidate or staff member be rejected, terminated or refused a promotion or training based on race, color, religion, sex (including gender identity and pregnancy status), sexual orientation, ethnicity, national origin, age, disability, HIV status, political or interest group affiliation, genetic information, veteran status, marital or parental status or any other characteristics protected by applicable local laws.

Harassment-Free Workplace

CHAI does not tolerate harassment or sexual harassment of any kind. Harassing conduct in any form is offensive, impairs morale and work performance, undermines the integrity of work relationships and causes serious harm to the stability of our organization. For similar reasons, we also do not tolerate harassment (including sexual harassment) by third parties with whom CHAI Staff work (e.g. vendors, partners). CHAI employees who engage in harassing behavior will be subject to termination.

Harassment means any verbal or other conduct that demeans, insults, or intimidates an individual staff member or group of staff members relating to one of the protected characteristics listed above in a way that could detrimentally affect that person's employment and/or work environment. Examples of harassment include, but are not limited to:

- Negative stereotyping based on protected characteristics, including but not limited to gender, race, ethnicity and age;
- Using racial or ethnic slurs or offensive slang terms (whether or not directed at the listener);
- Making inappropriate or disrespectful comments about a person or group of persons; and
- Excluding individuals from using facilities or work space because of a personal bias.

Sexual harassment means sexual advances, requests for sexual favors, and verbal or physical conduct of a sexual nature where (i) submission to such conduct is explicitly or implicitly tied to continued employment or advancement and/or (ii) such conduct creates a hostile work environment. Examples of sexual harassment include, but are not limited to:

- Unwelcome verbal or physical advances;
- Sexual or sexually-charged jokes;
- Written or spoken references to sexual conduct and/or gossip regarding one's sex life;
- Suggestive or demeaning comments about an individual's body or sexual activities;
- Displaying sexually suggestive videos, objects, pictures, cartoons, and magazines;
- Unwelcome requests for sexual acts or behavior; and
- Unwelcome and repeated or aggressive requests for dating or a relationship.

Substance- and Smoke-Free Workplace

Being under the influence of drugs or alcohol at work puts you, your colleagues and other parties at risk and could jeopardize CHAI's reputation and long term effectiveness. CHAI Staff may not possess, distribute or be under the influence of illicit drugs while on CHAI premises or when conducting CHAI business. CHAI Staff may not work or drive a CHAI vehicle while under the influence of drugs or alcohol. Concerns about alcohol or drug use should be directed to a manager or CHAI's [Safety Officer](#).

To protect and enhance our indoor air quality and to contribute to the health and well-being of all CHAI Staff, all CHAI offices and vehicles are entirely smoke free.

Violence-Free Workplace

CHAI has a zero-tolerance policy for violence, or threats of violence, in the workplace. No CHAI Staff may possess firearms or weapons while on CHAI property or in connection with any work-related activity, unless approved for security purposes in exceptional circumstances by CHAI's Safety Officer. Any violence or threat of violence against a colleague or CHAI partner, regardless of time or location, is cause for termination. If someone is in immediate danger, always contact local law enforcement authorities before reporting the incident to a CHAI manager and/or the Safety Officer.

COMMITMENT TO PERSONAL INTEGRITY

Conflicts of Interest

CHAI Staff are expected to fulfill their CHAI responsibilities with the utmost good faith and loyalty. Consistent with this duty, CHAI Staff must avoid any conflict or appearance of a conflict between personal or outside interests and those of CHAI. Conflicts of interest are not always obvious, even to individuals involved. Most conflicts fall into a gray area where ethics and public perception are more relevant than statutes or precedents.

Conflicts of interest come in two types:

- **Personal conflict of interest:** where an individual's actions and/or activities are intended to or do in fact result in improper influence or improper gain or advantage to that individual or his/her immediate family members or other close relations, or a business entity in which they possess a significant economic interest.

- ***Organizational conflict of interest:*** where an individual's actions and/or activities put the interests of an outside entity before CHAI's interests, in a way that undermines CHAI's interests or reputation.

To ensure that CHAI maintains objectivity and independence in decision-making processes and to protect against any perception that CHAI favors or is influenced by personal considerations, CHAI Staff must be vigilant in identifying and avoiding conflicts. If there is ever a question regarding whether a conflict exists, contact the EVP for HR.

Personal conflicts of interest generally include (but are not limited to):

- Awarding a contract to a business owned by a family member or close contact without proper disclosure and transparent procurement process.
- Making business decisions based on personal financial interests or to gain favor.
- Soliciting or accepting a personal loan or any free service or discount or other fees from or on behalf of a current or potential supplier or contractor.

Organizational conflicts of interest generally include (but are not limited to):

- Endorsing pharmaceutical or other health products in exchange for a return benefit for CHAI or using a possible endorsement to influence the conduct of third parties.
- Taking on outside employment where responsibilities would directly conflict or interfere with CHAI duties.
- Sharing confidential CHAI donor names, contact details or other proprietary information with other organizations without first securing permission from the donor.

Disclosure & Clearance

CHAI Staff must disclose any potential conflict of interest to their manager as soon as the conflict arises. Managers should evaluate whether a conflict exists and, if so, act to mitigate its negative effects. Managers should consult their respective next higher manager if the conflict cannot be resolved and/or they are involved in the conflict. In case of disagreement with a manager's decision regarding a possible conflict, contact the next higher manager, an SLT member or the [CHAI Helpline](#).

Gifts and Hospitality

In general, it is improper for CHAI Staff to give or accept gifts or hospitality from or to a party seeking to create or bolster a business relationship with CHAI. Examples of improper gifts include accepting an expensive meal or event tickets from suppliers wishing to do business with CHAI or personal use of a vendor's vacation home. If, however, the gift is of minimal value and if it would give offense to refuse it, CHAI Staff may accept the gift and then promptly disclose it to their direct manager. If a CHAI Staff member has a pre-existing relationship with a donor or outside party accepting a gift or invitation could appear improper, seek approval from the EVP for HR.

Political & Lobbying Activities

As a not-for-profit organization under the U.S. tax code, CHAI may not participate or intervene in, or contribute to, any political party or campaign on behalf of or in opposition to any candidate for elected office in the US or any other country. Further, CHAI may not devote a substantial part of its activities to lobbying for or against any legislation. However, these restrictions on political and

lobbying activities apply only to CHAI and its resources and are not meant to discourage support for your preferred candidates or political parties. Personal involvement in such activities is permitted, provided that it does not interfere with work performance or involve CHAI resources. Direct any questions about political/lobbying activities to a manager or an SLT member.

RESPECT FOR CHAI ASSETS, RESOURCES AND REPUTATION

Safeguarding Confidential Information

In the course of CHAI work CHAI Staff may be exposed to confidential and/or proprietary information that relates to CHAI's business or financial affairs or to the affairs of governments or other partners (collectively, "Confidential Information"). Examples of Confidential Information include financial information, costing and budgeting information, briefing materials, reports, product information, scientific or technical information and other non-public information concerning CHAI or partner activities.

Every effort must be made to safeguard materials or documents containing Confidential Information against loss/theft/unauthorized access. All Confidential Information must remain confidential during and after the completion of employment or service, unless the information becomes publicly available. CHAI Staff may not disclose or benefit from any Confidential Information while working for CHAI or at any time thereafter. All tangible Confidential Information must be returned to CHAI at the end of CHAI employment/service.

Protecting Intellectual Property

All intellectual property (IP) created, made, conceived or reduced to practice by CHAI Staff in the course of CHAI employment or service or using CHAI resources or Confidential Information is owned by CHAI. Examples of IP include discoveries, inventions, improvements, enhancements, processes, methods, techniques, software, and works of authorship directly related to their work at CHAI. CHAI Staff are expected to promptly disclose potentially valuable IP and agree to assist CHAI in establishing CHAI's ownership rights in that IP.

Preventing Corruption and Fraud

CHAI is committed to detecting and preventing corruption and fraud throughout the organization. All CHAI Staff are expected to be honest, transparent and fair in their dealings with all internal and external parties. Any detected or reported cases of fraud or corruption will be thoroughly investigated by CHAI's Chief Financial Officer (CFO). See the [Investigations](#) section for details. .

"Corruption" means directly or indirectly offering, making, promising, approving or authorizing the making of any payment or gift with the intent to influence an act, mission or decision-making process. All CHAI Staff are expected to adhere to the Federal Corrupt Practices Act (FCPA)¹, which

¹ The FCPA prohibits corruptly giving anything of value to any foreign official, party or candidate for political office for purposes of influencing any act by a foreign government or foreign government "instrumentality" to assist CHAI in obtaining or keeping business. Additionally, the FCPA applies to corporate payments made to third parties (e.g., consultants, agents or other intermediaries) if there is reason to believe that corrupt payments would be made to a government official for purposes of obtaining or keeping CHAI business. (Contact the Safety Officer with any questions about the statute's applicability.)

applies to all international activities by representatives of a U.S. company (including nongovernmental organizations), as well as any other local anti-bribery laws and regulations.

CHAI defines “fraud” as the use of deception to enrich or advantage oneself or a third party, or to avoid an obligation or cause loss to another party. “Fraud” encompasses deception, bribery, forgery, extortion, corruption, theft, conspiracy, embezzlement, misappropriation, false representation, concealment of material facts and collusion. Examples of fraud include, but are not limited to:

- *Unauthorized use of CHAI Staff time, property, credit cards, cell phones or other resources;*
- *Submission of personal or fictitious expenses for reimbursement of fictitious or inflated vendor invoices or payroll records for payment;*
- *Receipt of kickbacks or other unauthorized personal benefits from vendors or others;*
- *Forgery or fraudulent alteration of any check, bank draft, statement, billing record, form, report, return or other financial document;*
- *Intentional failure to disclose material related to party transactions, noncompliance with donor/grantor requirements or restrictions or other required disclosure matters; and*
- *Intentional misrepresentation of professional training experiences, or accomplishments or other misrepresentations that are designed to mislead CHAI or our partners or which can otherwise damage CHAI’s reputation.*

If you encounter possible corruption or fraud, notify your manager and/or the CFO or call the [CHAI Helpline](#) without delay.

Responsible Use of CHAI Resources

All CHAI equipment and supplies (including motor vehicles, computers, email accounts, mobile phones, credit cards, etc.) are furnished to facilitate our work and mission. CHAI Staff are expected to use and maintain these resources with utmost care and to take proper measures to safeguard all assigned CHAI equipment and data to prevent unauthorized access, loss or theft. CHAI Staff are prohibited from downloading and/or installing CHAI-licensed software on personal computers (doing so violates CHAI’s usage agreements with vendors and is considered piracy).

Occasional personal use of CHAI resources (e.g., emails and phone calls) is permitted, provided that it is not excessive, does not involve unprofessional or inappropriate content (e.g., pornography) and does not interfere with CHAI responsibilities or productivity.

Protecting Your Privacy and Personal Data

During the course of employment or service, CHAI Staff may provide CHAI with personal, medical and financial information, including:

- Medical records and personal health history
- Contact information and national identification numbers for CHAI Staff and family members
- Bank account details and tax forms

CHAI is committed to protecting this sensitive information. CHAI Staff with access to this personal data must take special care to safeguard and use it only to the extent necessary in accordance with applicable law. CHAI Staff may not access colleagues’ sensitive information without specific

authorization and an articulated business need. CHAI will not release personal information without express written consent of the involved staff member unless legally required to do so. CHAI Staff are expected to take similar precautions with all partner and patient-identified data as further described below under the [Ethical Obligations in Global Health](#).

Media and Social Media

Because today's media and social media platforms disseminate information almost instantly, it is critical that any story, article or posting that references CHAI is accurate, thoughtful and authorized. Moreover, as some of CHAI's work is confidential and/or politically sensitive, CHAI Staff are expected to consider the potential impact of any publication on relationships with donors and government partners. Unless authorized by CHAI's Chief Executive Officer (CEO), no one at CHAI should speak to the media on behalf of CHAI, and no one should speak on behalf of the Clinton Foundation or President Clinton. While CHAI maintains a close relationship with the Foundation, CHAI Staff should make their best efforts to properly affiliate themselves with CHAI, not the Clinton Foundation, especially when communicating externally. Contact the Communications Manager with questions about how to communicate this affiliation.

Press/Media Inquiries

General media inquiries and contacts about CHAI (including requests for interviews, quotations or articles) must be referred to the Communications Manager at press@clintonhealthaccess.org. Media inquiries regarding CHAI's Board of Directors (or any member thereof), CHAI donors or President Clinton should be referred to the Communications Manager, with a copy to the CEO. Media inquiries regarding the details of a particular program must be referred to the Program Leadership Team (PLT) member and/or CD overseeing the program with a copy to the Communications Manager. Ahead of any major CHAI-coordinated events where media will be involved, confer with the Communications Manager and appropriate PLT member and/or CD to develop a communications plan.

Social Media

CHAI Staff are considered to be speaking on their own behalf in social media postings and will be held personally responsible for what they communicate. Social media communications includes all words and photos posted to a blog, social media platform (e.g., Facebook or Twitter) or website. Specifics about CHAI's work or work completed by an individual while working at CHAI should not be discussed on social media sites without approval from the Communications Manager.

Because an individual CHAI Staff member and/or CHAI can be held legally responsible for information posted or published via social media (even if published from a personal account and even if restrictive privacy settings are used), it is **NOT** appropriate to post anything (including recommendations or evaluations) related to CHAI colleagues or any of CHAI's partners, donors, suppliers or vendors without written permission.

ETHICAL OBLIGATIONS IN GLOBAL HEALTH

Working with Patient Data

Sensitive Data and the Right to Privacy

Protecting patient privacy and confidentiality is fundamental to CHAI's reputation and CHAI's ability to execute its mission. CHAI Staff frequently come in contact with patient medical records and sensitive, personally identified information like HIV status or financial data (collectively, sensitive personal information or "SPI"). To protect the rights of patients to their SPI, CHAI Staff must take steps to prevent disclosure of SPI and/or any linkage between individuals and their SPI, regardless of how that SPI came to CHAI or its intended purpose.

As CHAI and/or CHAI Staff can be held liable in the event of an unintended disclosure of SPI, proper data security protections are critical whenever handling data with SPI. CHAI Staff should first attempt to "clean" data by removing all identifying information. To the extent that the desired data cannot be de-linked from SPI, the file must be encrypted prior to sharing within CHAI and should not be shared with any third parties. Please note that some countries prohibit the removal of SPI data (electronically or otherwise), so CHAI Staff must be aware of and adhere to each government's patient privacy and confidentiality requirements.

Conducting "Research"

CHAI does not typically engage in activities that would be considered "human subjects research" as that term is typically used within the scientific community.² However, when CHAI activities involve interacting with human subjects or collecting their personally identifiable information, CHAI Staff have an important obligation to protect the rights and dignity of the individual participants. In any situation where data (behavioral, diagnostic or otherwise) is collected from an individual directly by CHAI Staff and in all cases where CHAI may wish to publish the resulting analysis (whether the data is collected directly by CHAI Staff or on behalf of CHAI by a third party), CHAI must ensure that each participant provides his/her **informed consent**. Informed consent means that the participant receives and understands both the benefits and the risks associated with participation and voluntarily agrees to participate. All CHAI Staff whose work involves human subjects research and/or individually identifiable data must review the CHAI Research Ethics Policy, including the guidelines for data collection and storage of sensitive patient data and informed consent.

Photos and Recorded Images

Consent is also required when taking photos or videos or otherwise recording images or a person's voice. If an individual's name, voice or likeness might be used to further the work of CHAI (whether in connection with programming, fundraising or other CHAI activities), consent is required. Contact the CHAI Contracts Department for a copy of the appropriate Consent Form.

² "Human Subjects Research" means the collection of data through a direct interaction with the living subject (e.g., a patient interview) or any intervention which involves a physical procedure on the subject to gather data (e.g., a diagnostic test) or a manipulation of the subject's environment for research purposes (e.g., withdrawing or substituting a treatment). (See the CHAI Research Policy for a detailed definition of "research" and associated terms.)

Working with Children

CHAI holds as a universal value that all children, in all circumstances, have the right to feel and to be safe and to live free from harm, exploitation and abuse. Whenever directly interacting with children:

- Strive to protect children from harm, actively evaluating situations to identify possible risks and working to mitigate those risks.
- Use language and behavior that is age-sensitive, culturally appropriate and respectful. Never use language that is condescending, harassing, abusive or sexually provocative.
- Obtain consent from a parent or guardian of a child (as defined by applicable local law) before conducting an interview or taking photographs or recorded images.
- Never possess, access, or distribute child pornography or take degrading, sexually suggestive or otherwise inappropriate photographs.
- Never engage children in any form of sexual activity or acts, including paying for sexual services or acts.
- Report possible physical or mental violence, injury, abuse, maltreatment or exploitation of children to the appropriate local authorities and to CHAI's EVP for HR.

Working in Clinical Settings

As part of our programmatic activities, CHAI Staff may be asked to work in a clinical setting. If your work puts you in contact with ill or severely immunocompromised patients, you are expected to practice careful hygiene and to take all precautions to minimize introduction or spread of infection.

CHAI Staff who are qualified healthcare professionals (i.e., doctors and nurses) must remember that they are invited into facility as mentors and advisors, not as clinicians. These clinicians are expected to encourage best practices in clinical medicine, while being respectful of the practices and expertise of local doctors and nurses. However, even if qualified to practice medicine, ***no CHAI Staff may provide "direct patient care"*** in connection with CHAI work. CHAI defines "direct patient care" as: (i) performing surgery or other medical procedures; (ii) prescribing medications; (iii) making official diagnoses; (iv) documenting in a patient's medical record; or (v) providing one-to-one psychological counseling and/or prescribing medical treatment for a mental illness. Protocol and procedures regarding patient interactions are further described in the CHAI Clinical Care Policy, which is signed by all clinicians at hire.

All CHAI Staff are asked to be mindful of this prohibition on direct patient care when communicating with partners about CHAI work. Any request by a CHAI partner to provide direct patient care in connection with CHAI activities must be declined. In cases of acute need, CHAI may agree to second or subcontract a clinician to the national ministry of health or entity capable of securing liability insurance or governmental immunity. All exceptions must be approved by the EVP for HR.

VIOLATIONS

Reporting Concerns & the CHAI Helpline

Every CHAI Staff member has a responsibility to ask questions, raise concerns and report possible violations of the Code and any other unethical or unlawful behavior. In most instances, It is best to approach a direct manager or Human Resources (HR) officer, but if uncomfortable speaking with either HR or a direct manager or if unsatisfied with their response, complaints can be made directly to any member of the SLT or via the **CHAI Helpline**.

The CHAI Helpline is a third party “whistleblower” service that allows CHAI Staff to report (anonymously or by name) possible Code violations or other instances of suspected misconduct. Anonymous reports will be taken just as seriously as reports where individuals identify themselves.

CHAI Helpline

Email: chai@whistleblowersecurity.com

Toll Free (US): 1-866-921-6714

Intl Phone: +1 403-230-6120

Web: www.whistleblowersecurity.com

Reports of violations or suspected violations are kept confidential to the fullest extent practicable, consistent with the need to conduct an adequate investigation. All disciplinary action (up to and including termination of employment) will be carried out in accordance with applicable local laws.

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation of CHAI’s policies or any other possible legal or ethical lapses must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of CHAI’s policies or other legal or ethical standard. Any allegations that prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense, and subject the violator with disciplinary action, to the extent permitted by applicable law, up to and including termination of employment.

No Retaliation

CHAI does not tolerate any form of harassment, retaliation, or adverse employment consequence against any CHAI Staff member who expresses concerns or lodges a good faith complaint under this Code or otherwise. Any CHAI Staff member who harasses, retaliates, or takes adverse action against someone who has reported a violation in good faith because of that report is subject to disciplinary action, to the extent permitted by applicable law, up to and including termination of employment.

Investigations

The EVP for HR is responsible for examining reported complaints and allegations concerning violations of this Code, as well as suspected legal or ethical lapses, at his/her discretion. Preparation of a written record of the investigation findings for a reported complaint/allegation is also at the discretion of the EVP for HR. The EVP for HR must immediately notify CFO of complaints/allegations regarding fraud or corruption, accounting practices, internal controls, or audits. The CFO oversees all financial investigations, notifying the head of the Finance Committee of CHAI’s Board regarding any viable complaint. Any investigation found to have merit is reported to the Chief Operating Officer and CEO. The EVP for HR annually reports to the SLT on the number and the nature of reported potential whistleblower complaints and allegations and their outcomes.