



# Global Standards of Business Conduct

REVISED: July 2024

## **Global Standards of Business Conduct | July 2024**

---

Water.org has positively transformed millions of lives around the world through access to safe water and sanitation. We have been pioneering market-driven financial solutions to the global water crisis for more than 30 years – giving women hope, children health and communities a future.

Our approach is proven and powerful; we think in terms of practical, market-based economic solutions and believe in the power and autonomy of the people we serve. Our solutions come from collaboration – connecting the right partners and participants with the right expertise and resources, leading to solutions that work.

Our impact, our approach, and ultimately our ability to achieve our vision of safe water and the dignity of a toilet for all, are driven by our global team of determined, curious, insightful, and bold thinkers and doers. Imperative to our success is ensuring we settle for nothing less than the highest standards of business conduct.

Water.org's Global Standards of Business Conduct (hereby referred to as the "Standards") is designed as a guide to ensure we, the employees of Water.org, observe the highest standards of integrity and ethics as we conduct business.

The policies contained in this document express Water.org's expectations for how business is to be conducted globally, in all countries of operation. This is a guide to help us make the right choices, providing clear instructions for appropriate business conduct and decisions which impact the organization, clients, partners and the people we empower.

The Standards provide a common set of expectations for our conduct, a key element of which is that, at a minimum, employees abide by applicable laws and regulations. In some instances, the Standards may differ by local laws or norms. It is our expectation that the higher standard will be followed.

Any employee who is found to have violated the Standards will be subject to discipline determined by management in its sole discretion. Nothing within the Standards should be understood in any way as a limitation on management's right to decide what action is appropriate under given circumstances.

## Table of Contents

---

International Operations Policy .....	4
Global Diversity .....	4
Ethics Policy .....	4
Confidentiality and Non-Disclosure .....	4
Conflict of Interest .....	5
<i>Outside Employment</i> .....	5
<i>Bribery and Corruption</i> .....	5
<i>Anti-Fraud</i> .....	6
<i>Gifts and Entertainment</i> .....	6
<i>Political Activities</i> .....	6
Equal Opportunity in the Workplace .....	6
Non-Discrimination and Anti-Harassment .....	7
Reporting Violations .....	7
<i>Global Anonymous Reporting</i> .....	8
Communications .....	8
<i>Social Media</i> .....	8
Technology Use and Digital Communications .....	9
Relationships in the Workplace .....	9
Records .....	10
Safety and Security .....	10
Acknowledgment .....	11

## **International Operations Policy**

---

The Water.org Standards is designed to provide overarching guidance for all locations. In addition, each location where we operate will have its own set of policies and work rules providing guidance to employees for the country in which they are working. In some instances, the laws of two or more countries may conflict, or a local law may conflict with a provision in the Standards. In the event a provision in the Standards does not meet local requirements, or violates local law, then the local law or regulation will govern. It is the responsibility of all Water.org employees to know our local policies and procedures as well as the global Standards.

## **Global Diversity**

---

Diversity and inclusion of thought, skill, knowledge and culture creates a foundation that drives our strong ability to navigate the complex and constantly changing global water crisis. Diversity strengthens us by promoting unique viewpoints and challenges each of us, every day, to think beyond our traditional frames of reference. Water.org is committed to building a talented, diverse workforce and creating an environment in which each of us has the opportunity to excel based on our performance.

Our Standards promotes diversity and inclusion and prohibits *all* forms of discrimination and/or harassment, including discrimination for any protected groups (e.g., gender, race, religion, etc.) in accordance with local and country specific employment laws.

Our diversity and inclusion efforts are comprehensive and range from our recruiting, selection, and hiring policies and practices to developing a premier global work environment that values unique perspectives, encourages individual growth and treats all employees with respect and dignity.

## **Ethics Policy**

---

It is the policy of Water.org that we comply with all governmental laws, rules, and regulations applicable to our business. Additionally, we are expected to conduct our duties and responsibilities with accuracy, honesty, integrity and to be forthcoming in all day-to-day operations.

We have a well-founded reputation for meticulous operational dealings. We care how results are obtained and will not tolerate employees achieving results at the cost of violation of law or dishonest dealings.

## **Confidentiality and Non-Disclosure**

---

Water.org employees have a duty to protect confidential information and to take precautions to ensure that it is not used or disclosed improperly.

Confidential information includes all information that is not public and can be harmful to Water.org or its employees if disclosed. Confidential information includes, but is not limited to, any data, programs, procedures, financial data, business plans, trade secrets, proprietary information, and/or personal employment data to include protected health information.

A best practice is to assume that all information and correspondence sent through, received by, or stored within our digital communications (e.g., electronic mail, voicemail accounts, websites, etc.), as well as the information we create, send, receive, process or store on Water.org technology is confidential, unless the contrary is clear.

Some of the ways in which employees are expected to protect confidential information and personal data include using only approved Water.org systems and applications; using caution with social media; and having awareness when sharing confidential information in public spaces and forums. Confidential information should not be shared with anyone inside or outside the organization unless permitted to do so under applicable law, regulations, and Water.org policy or procedures.

Employees are expected to report any known or suspected disclosure of confidential information without fear of retaliation for expressing such concern. Nothing in the Standards should be interpreted to prevent employees from engaging in activities that are protected under laws and regulations. Furthermore, employees are also expected to respond truthfully to questions or concerns from the government, a regulator or in a court of law.

### **Conflict of Interest**

---

Water.org employees should avoid any actual or apparent conflict between an employee's own personal interests and the interests of the organization. A conflict of interest can arise when you take actions or have personal interests that may interfere with your objectives and effective work performance. For example, a conflict can arise when your judgment could be influenced, or might appear as being influenced, by the possibility of personal or financial benefit.

Even when not intentional, the appearance of a conflict may be just as damaging as an actual conflict. It is each employee's responsibility to report any suspected conflicts of interest to your immediate supervisor, Human Resources, and/or appropriate member of the leadership team. Please see the Reporting Violations section.

The following sections provide additional guidance with respect to activities and situations that could give rise to a conflict of interest.

### **Outside Employment**

You may not operate or work in any business that interferes with your responsibilities as a Water.org employee; benefits from your status as a Water.org employee; is similar in nature to your role as an employee of Water.org; benefits from the use of Water.org assets; or in any way reflects negatively on Water.org. Additionally, employees should avoid employment or outside interests that may create, or give the appearance of creating, a conflict of interest. For example, working for a business associate that has any influence or conflict (either direct or indirect) with Water.org.

### **Bribery and Corruption**

Anti-corruption practices are an essential component of the Standards, given that we operate globally and in many different environments. We are committed to comply with the U.S. Foreign Corrupt Practices Act (FCPA) and all other applicable global anticorruption standards in all business relationships.

Employees may not engage in bribery or corrupt practices. This is vital to maintaining the trust of our colleagues, clients, and others we work with. We do not solicit, accept, offer, promise, or pay bribes, including facilitation payments – whether directly or through a third party.

A bribe is any money, goods, services, or “other thing of value” (e.g., business opportunities; stock options; cash or cash equivalents; sponsorships; political contributions; etc.) offered or given with the intent to gain an improper advantage for Water.org.

You are prohibited from making payments to, or engaging in transactions with, government officials (e.g., any person acting in an official capacity on behalf of a national, state, or local government entity; any officer or employee of a public international organization or any department or agency like the United Nations, World Bank, or World Trade Organization; any political party or official thereof, etc.) to improperly influence their duties. All contracts must include a requirement to comply with all laws, keep accurate books and records, and where appropriate, contain specific anti-bribery commitments.

We do not conduct any activities in breach of applicable economic sanctions or undertake services which assist clients in breaching applicable sanctions and laws. Suspected violations or any requests for a bribe

must be immediately reported to your immediate supervisor, Human Resources, and/or appropriate member of the leadership team. Where criminal behavior is suspected, immediate action is taken.

### ***Anti-Fraud***

Water.org subscribes to a zero-tolerance policy for actions constituting fraud. Employees must comply with all ethical principles and policies of the organization and all laws and regulations governing the activities of the organization. It is the responsibility of employees to report any suspected unethical or fraudulent activity to their immediate supervisor, Human Resources, and/or appropriate member of the leadership team.

### ***Gifts and Entertainment***

Accepting gifts and entertainment can cause a conflict, or appearance of a conflict, between personal interests and professional responsibility. Our position on gifts and entertainment stems from our values of complete transparency and objectivity. We recognize, as a global company, we may encounter situations in which local practices will come into play. In some countries where gift giving is a custom or tradition, it is good practice to politely explain this policy to those with whom we work and exercise good judgment in accordance with all local laws and regulations. Good judgment includes business gifts of reasonable value (e.g., minimal or insignificant value and non-cash) and only with the approval of immediate supervisor and appropriate member of the leadership team.

This extends to the giving of gifts or supplies in any form to interviewees and others we may encounter in field visits. Water.org does not compensate those we interact with in the field for their time. We understand and recognize their time is valuable and acknowledge that to participate in our visit they may take off work and/or keep their family home. Compensating interviewees and others in the field in any form can be perceived as influencing their responses which can impact the authenticity of the content. We are grateful for their time and the stories they make possible that help connect donors and partners to the work we do of making safe water or sanitation possible for others in need.

Providing entertainment must not be intended to create an improper advantage for Water.org. All expenditures for entertainment provided by Water.org must be authorized and accurately recorded in accordance with the office's respective Expense Reimbursement policy. It is not allowable to provide gifts to interns/contractors/volunteers.

Before gifts or entertainment are provided, in accordance with the statements above, due consideration should be given to align with Water.org standards towards creating an environment free from harassment, hence, any such act should be executed with utmost care for dignity of other employees.

### ***Political Activities***

It is the policy of Water.org to refrain from making contributions to political candidates and political parties; organizational funds shall not be provided to political candidates and/or entities of organizations. Furthermore, employees shall refrain from using job title or Water.org affiliation in connection with any personal political activities. Only the CEO or President can authorize employees to represent or communicate information and views on issues of public concern that have an important impact to the organization.

### ***Equal Opportunity in the Workplace***

---

Water.org provides equal employment opportunity in conformance with all applicable local and country laws and regulations to individuals who are qualified to perform job requirements. We administer our personnel policies, programs, and practices in a manner that complies with applicable anti-discrimination law in all aspects of the employment relationship, including but not limited to recruitment, hiring, work assignment, performance management, promotion, transfer, termination, total rewards, and/or selection for training.

Supervisors are responsible for implementing and administering equal employment in the workplace; maintaining a work environment free from unlawful discrimination; ensuring employment related decisions are based on merit; and promptly identifying and resolving any problem areas regarding equal employment for any protected groups (e.g., gender, race, religion, etc.) in accordance with local and country specific employment laws.

If you believe you have observed or been subjected to prohibited discrimination, you should immediately report the incident in accordance with your local policies if applicable, otherwise to your immediate supervisor, Human Resources, and/or appropriate member of the leadership team.

You will not be subjected to harassment, intimidation, discrimination, or retaliation/victimization for exercising any of the rights protected by this section and the various legal statutes of all local and country specific policies and procedures. Please see the Reporting Violations section below.

### **Non-Discrimination and Anti-Harassment**

---

Water.org believes that employees should treat and be treated by each other with dignity and respect. We are committed to providing employees a work environment free of intimidation, insult and harassment.

In general, harassment is defined as verbal or physical conduct related to one's protected class (as defined in accordance with local and country specific employment laws) that unreasonably interferes with an employee's work performance and/or creates an intimidating or hostile work environment. The determination of an intimidating or hostile work environment can be based on a number of circumstances, including but not limited to, the frequency of inappropriate conduct (e.g., vulgar, offensive, profane, or insulting behavior, comments or jokes directed toward a coworker, either in person or in written form), its severity, and whether it's threatening or humiliating.

### ***Sexual Harassment***

Water.org believes that employees have a right to a workplace free of sexual harassment. No employee shall imply or threaten that another employee's refusal to submit to sexual advances will adversely affect that employee's employment, evaluation, pay, advancement opportunities, job assignments or any other aspect of employment.

Other forms of sexual harassment are also absolutely prohibited and includes, but is not limited to touching, making improper or unwelcome advances or propositions; using abusive or vulgar language of a sexual nature; commenting or joking about an employee's physical appearance; and/or displaying sexually suggestive cartoons, pictures or photographs.

An employee who feels that he or she has experienced or observed any kind of discrimination or harassment should report such incidents in accordance with local policies on reporting if applicable, otherwise as set forth below in the Reporting Violations section.

### **Reporting Violations + Global Anonymous Reporting**

---

Reporting violations of Water.org policy or procedure should be reported to your immediate supervisor, Human Resources, and/or the appropriate member of the leadership team. Violations can be reported directly to Human Resources if there is reason not to report an issue with immediate supervisor or appropriate organization leaders.

Any employee who believes he or she has been subjected to intimidation or retaliation for reporting a violation should notify Human Resources immediately.

## ***Global Anonymous Reporting***

A key component for reporting violations is to provide a good faith avenue for employees to raise concerns anonymously with the reassurance they will be protected from reprisals or victimization from filing a report. Water.org has retained Lighthouse, a highly reputable global third-party organization specifically equipped to deal with serious concerns relating to financial reporting, unethical or illegal conduct, violations of the Standards and/or regional or local laws. Employees who have been victim of or have witnessed unethical behavior can contact Lighthouse 24-hours a day, seven days a week. Reports can be submitted via website [www.lighthouse-services.com/water](http://www.lighthouse-services.com/water) or via email [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com).

Any employee who is, after investigation, found to have provided false information or to have acted in bad faith may be subject to disciplinary action. However, if an employee voluntarily reports they were involved in a violation, self-reporting may be given consideration when determining the appropriate disciplinary action to be taken.

## **Communications**

---

To avoid providing inaccurate, incomplete, or material information to outside sources, all external and formal media inquiries must be referred to an organizational leader of Water.org. Only authorized employees, as determined by organizational leaders, may engage in discussions about Water.org with the media.

Any use of social media, chat rooms, blogs, or other digital communication methods with regard to Water.org information must be in strict compliance with Water.org's Standards and applicable local policies. Employees are expected to show good judgment in relation to all such communications that may have impact on Water.org, employees, and or stakeholders.

## **Social Media**

We understand that social media can be a fun and rewarding way to share your life and opinions with family, friends and co-workers around the world. However, use of social media also presents certain risks and carries with it certain responsibilities.

Social media includes all means of communicating or posting information or content of any sort on the Internet, including to your own or someone else's web log or blog, journal or diary, personal web site, social networking or affinity web site, web bulletin board or a chat room, whether or not associated or affiliated with Water.org, as well as any other form of electronic communication.

The same principles and guidelines found in Water.org policies apply to your activities online. Ultimately, you are solely responsible for what you post online. Before creating online content, consider some of the risks and rewards that are involved. Keep in mind that any of your conduct that adversely affects your job performance, the performance of fellow employees or otherwise adversely affects stakeholders of Water.org or Water.org's legitimate business interests may result in disciplinary action up to and including termination.

Carefully read the Global Standards and your local handbook. Pay particular attention to the Ethics Policy, the Confidentiality and Non-Disclosure Policy, and the Non-Discrimination & Anti-Harassment Policy, and ensure your postings are consistent with these policies. Inappropriate postings that may include discriminatory remarks, harassment, expressions of hate or intolerance of any kind regarding any protected class, solicitations to commit crimes, plagiarism of copyrighted material, child pornography, perjury, blackmail, and threats of violence or similar inappropriate or unlawful conduct will not be tolerated and may subject you to disciplinary action up to and including termination.

Be respectful to fellow employees and Water.org stakeholders. If you decide to post complaints or criticism, avoid using statements, photographs, video or audio that reasonably could be viewed as malicious, obscene, threatening or intimidating, that disparage employees or stakeholders or might constitute harassment or bullying. Examples of such conduct might include offensive posts meant to

intentionally harm someone's reputation or posts that could contribute to a hostile work environment on the basis of race, sex, disability, religion or any other status protected by law or company policy.

Express only your personal opinions. Never represent yourself as a spokesperson for Water.org. If Water.org is a subject of the content you are creating, be clear and open about the fact that you are an employee and make it clear that your views do not represent those of Water.org, fellow employees or stakeholder. If you do publish a blog or post online related to the work you do or subjects associated with Water.org, make it clear that you are not speaking on behalf of Water.org. It is best to include a disclaimer such as "The postings on this site are my own and do not necessarily reflect the views of Water.org."

Refrain from using social media while on work time or on equipment we provide, unless it is work-related as authorized by your manager or consistent with the Company Equipment Policy. Do not use Water.org email addresses to register on social networks, blogs or other online tools utilized for personal use.

Water.org prohibits taking negative action against any associate for reporting a possible deviation from this policy or for cooperating in an investigation. Any associate who retaliates against another associate for reporting a possible deviation from this policy or for cooperating in an investigation will be subject to disciplinary action, up to and including termination.

This policy does not restrict activities protected by law. If you have questions or need further guidance, please contact Human Resources.

### **Technology Use and Digital Communications**

---

Water.org has security measures in place to safeguard all forms of technology (e.g., hardware and software) and Digital Communications (e.g., electronic mail, voicemail accounts, websites, etc.) used in the course of Water.org business operations.

The use of Water.org technology and/or digital communications in a manner considered disruptive, offensive, illegal, and/or harmful to Water.org, or otherwise contrary to Water.org policies and procedures is prohibited. Moreover, the use of unauthorized codes or passwords to gain access to another employee's technology or digital communications is prohibited.

### **Relationships in the Workplace**

---

To avoid actual or apparent conflicts of interest, Water.org prohibits employing relatives. For the purposes of this policy, a relative includes the following:

- the employee's spouse, civil partner or partner; and
- the employee's, the spouse's or the civil partner's or partner's natural and adopted children, step-children parents, step-parents, grandparents, great-grandparents, brothers, sisters, half brothers and sisters, grandchildren, great-grandchildren, aunts, uncles, nieces, nephews, cousins and persons married to them.

In addition, persons involved in a fraternizing relationship may not be employed in a position that results in direct supervision; might cause a conflict of interest; or have a negative effect on Water.org's business operations. If you are in a fraternizing relationship, Water.org requests that you complete a [consensual relationship disclosure](#) (also available in the policy center).

This policy is intended to protect employees from favoritism, retaliation and incidents of sexual harassment in support of maintaining a professional work environment. Where doubts exist as to the specific meaning of the terms used above, employees should make judgments based on the overall spirit and intent of this policy.

## **Records**

---

All Water.org records must be correct and complete and follow all policies and procedures for data storage and retention, to include destroying documents when applicable retention periods have expired. Effective record management helps us meet business needs and obtain relevant documents. For more detail refer to the Record Retention Policy which provides standard criteria and guidelines for maintaining and discarding organizational records.

We will comply with internal or external audits or investigation of records, by providing the information required and never try to delay or impede any investigation by altering, hiding or destroying documents.

## **Safety and Security**

---

The safety, security and well-being of employees is one of Water.org's highest priorities. Given the volatility of socio-political and physical risks, conducting normal business activities entails exposure to risk factors, some of which are outside the control of the organization. Our intent is to ensure that employees are equipped and supported to operate in diverse global environments with varying risk profiles and to reduce the risks to their safety and security.

Therefore, Water.org is committed to providing its employees with a global safety and security framework, support, and tools to identify and manage risks associated with its activities. The organization's (or third party providers', as applicable) risk management and emergency response procedures will be conducted in full compliance with international law and legal frameworks.

Safety and security require the active participation of employees to take proper steps to protect themselves, assets, and information by complying in all respects with applicable policies, guidance and tools and avoiding actions which place themselves and others at unnecessary risk.

### **Acknowledgment**

---

I have received a copy of Water.org's Standards and acknowledge that I have read and fully understand its contents. I understand and agree to comply with Water.org's Standards.

The Water.org Standards do not create an expressed or implied employment contract, promise or covenant of any type between Water.org and me. I further understand and agree that no person other than Human Resources has the authority to approve and implement modifications and additions to the Standards.

Employee Name (Please Print)

---

Employee Signature & Date

---