

LIVING OUR VALUES



Chemonics International **STANDARDS OF BUSINESS CONDUCT**

CARING ► EXCELLENCE ► INNOVATION ► INTEGRITY ► OPPORTUNITY

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EXCELLENCE

INNOVATION

CARING

INTEGRITY

OPPORTUNITY

Chemonics International began its work in 1975 in countries as diverse as Afghanistan and Cameroon. Within the first decade, our projects spanned four continents and most sectors of international development, from agriculture to the environment, business to finance, and governance to health. Today, we operate in the same wide arena and with a heightened sense of mission.

By promoting meaningful change around the world, we help people live healthier, more productive, and more independent lives.



CONTENTS

LIVING OUR VALUES	1
APPLYING OUR STANDARDS	2
A PROCESS FOR SOUND DECISION MAKING	3
TEN PRINCIPLES THAT DEFINE OUR BUSINESS CONDUCT	
■ Treat Others with Respect	6
■ Be a Good Business Partner	8
■ Keep Complete and Truthful Records	10
■ Protect Chemonics and Client Assets	12
■ Maintain Objectivity in Decision Making	14
■ Think Carefully Before Giving or Accepting Business Favors	16
■ Promote Fair and Healthy Competition	18
■ Uphold the Integrity of the Procurement Process	20
■ Exercise Integrity in Recruiting and Hiring	22
■ Follow U.S. Law and International Agreements on Corruption	24
GETTING ASSISTANCE AND RAISING CONCERNS	26
INDEX	27



Farmers like this member of the Eco Tea Cooperative in Ilam, Eastern Nepal converted to organic tea farming and obtained certification, allowing them to secure greater livelihoods and meet growing market demand.

LIVING OUR VALUES

Chemonics has always maintained high standards of professionalism and integrity. This document, *Living Our Values*, gives written expression to what our company has long practiced. It is a clear statement of what we believe in and the way we work.

Living Our Values contains 10 important principles that serve as standards of business conduct at Chemonics. Together these represent a critical business resource and an aid to good decision making. *Living Our Values* is intended to help us recognize issues involving business integrity and take appropriate actions with confidence. As individuals, *Living Our Values* helps us:

- Follow the law
- Increase awareness of integrity issues
- Make good decisions
- Communicate openly and honestly
- Carry out effective international development work

Chemonics' work in international development is rich with promise and idealism. Our work also involves practical choices that may pose challenges to ethical decision making. Our standards of conduct help us resolve these challenges.

OUR VALUES

Chemonics' standards of business conduct have their origin in our company values. These remain constant in a changing world and are the foundation of all our work:

CARING

We are passionate about making a difference in the communities we serve.

EXCELLENCE

We aspire to leadership and excellence for ourselves and our work.

INNOVATION

We are thinking, learning professionals who innovate and share knowledge.

INTEGRITY

We prize honesty, respect, and trust in our relationships.

OPPORTUNITY

We create work environments where initiative, opportunity, and teamwork abound.

APPLYING OUR STANDARDS

Chemonics' standards of business conduct apply to all employees worldwide, the Board of Directors, consultants, authorized representatives, and all others acting on Chemonics' behalf. The company also expects everyone who represents its interests to strictly observe the laws and regulations of the countries in which we work, as well as comply with the terms of our contracts and other funding agreements..

Chemonics' policies and procedures implement our standards of business conduct. Our policies and procedures are available in our Policy Manual, our Quality Management System, from our supervisors, and from the senior vice president of Human Resources. Laws, regulations, and policies change as our business evolves. It is important to obtain the most current information when making decisions.

These standards of conduct do not constitute a contract and do not provide any rights, contractual or otherwise, to Chemonics' employees or any third parties.

We are all responsible for upholding our standards of conduct, making decisions with integrity, doing the right thing, and reporting potential issues. The key to maintaining a healthy work environment is for everyone, individually, to take action to ensure we are living our values.

Chemonics policy and U.S. and other applicable laws and regulations prohibit retaliation against anyone who reports a concern or who cooperates in an investigation.

A PROCESS FOR SOUND DECISION MAKING

Sometimes competing pressures make it hard to make the right decision. In those circumstances, the following process may help us determine the best course of action.

BE AWARE

- Become familiar with Chemonics' standards of business conduct and keep a copy handy.
- Be alert to situations in which you are asked to do something you think might be wrong.
- Learn to recognize situations that may involve improper or illegal conduct — either your own or someone else's.

WEIGH YOUR OPTIONS

- In deciding on a course of action, ask yourself:
 - Is it right? Is it legal? Does it reflect Chemonics' values?
 - How will what I do reflect on Chemonics?
 - How will I explain my logic and reasoning to others? How will it appear to others?
 - Who else will be affected by my decision?
- Review all the facts until the issue is clear in your mind.

SEEK ADVICE

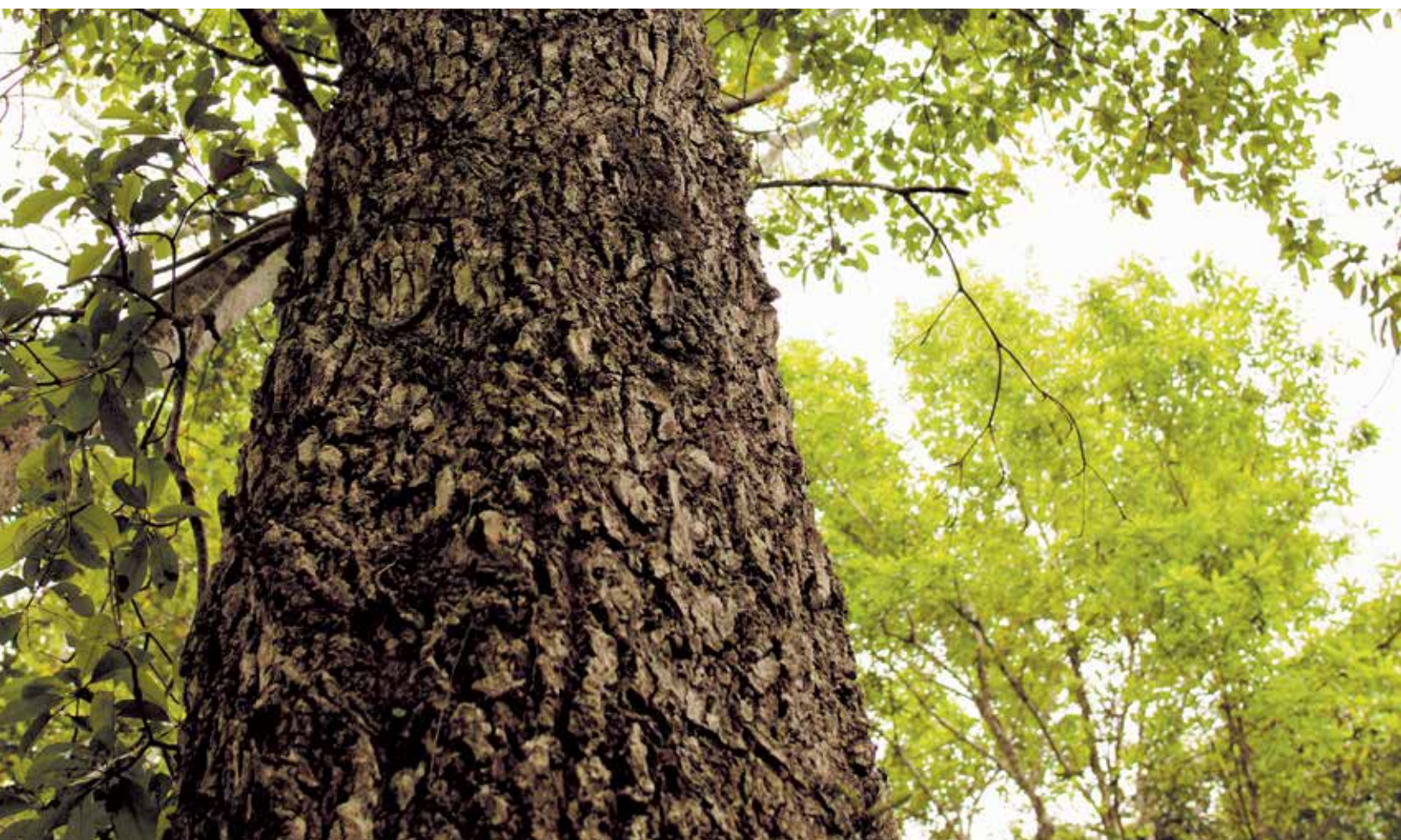
- Refer to Chemonics' standards of business conduct and to company policies for guidance.
- Confer with trusted colleagues, supervisors, and Chemonics experts.
- Process other people's advice and weigh the options again.
- Assess the risks and consequences and ways to reduce them.
- Think creatively. Ask yourself if there is any solution you haven't yet considered.

TAKE ACTION

- Recognize that taking the right action may be the most difficult step, requiring courage, creativity, diplomacy, and negotiation skills.
- Find the courage to take the right action, even if it is difficult.

BE A LEADER

- Guide others through the process of decision making, rather than being judgmental or telling them what to do.
- Mentor others to help them make decisions freely and independently.



Chiclet tree, Guatemala.



TEN PRINCIPLES THAT DEFINE OUR BUSINESS CONDUCT

Living Our Values describes 10 fundamental principles of business conduct at Chemonics.
Within each principle, we explain the standards we all must follow.

TREAT OTHERS WITH RESPECT



Access and exposure to literacy resources such as this reading room serve as an important component towards building basic skills and improving assessment scores for students in Zambia.

TREAT OTHERS WITH RESPECT

One of our company's great strengths is the diversity of our people. We work and collaborate with people of different races, nationalities, religious beliefs, ages, genders, and cultures. We are deeply committed to treating each other with understanding, dignity, and respect.

Chemonics supports the principles established under the United Nations Universal Declaration of Human Rights. We are committed to providing equal opportunity in all aspects of employment and to maintaining a work environment free from discrimination, harassment, and sexual exploitation or abuse. We uphold these policies worldwide, including in countries that have no specific legal prohibitions against sexual or other forms of abuse, discrimination or harassment.¹ We each have a responsibility to create and maintain an open and positive work environment where we respect our differences and value and acknowledge everyone's contributions. Our company is most productive when every staff member practices this principle.

As a company, we are also committed to the safety and security of our people and the communities we serve. To the best of our ability, we each must promote and take steps to provide a safe environment for our employees and beneficiaries. To this end, Chemonics abides by the following child safeguarding core principles² in our international development work:

- We strictly follow local and international laws and standards related to child welfare and protection.
- We prohibit our employees and consultants from engaging in child abuse, exploitation, or neglect.
- We consider child safeguarding in project planning and implementation and work to reduce the risk of child abuse, exploitation, or neglect in our projects, where applicable.
- We require that all employees, consultants, and others acting on behalf of Chemonics recognize child abuse, exploitation, or neglect and report potential violations to the company for investigation and appropriate action, up to and including termination of employment.

In addition, Chemonics firmly values human dignity and human rights for all people. We share the U.S. government and other donor policies of zero tolerance on Trafficking in Persons.³ All individuals and companies working with Chemonics are prohibited from engaging in or supporting any form of human trafficking, defined as the recruitment, transfer, or harbor of any person by means of threat, use of force, or coercion for the purpose of exploitation. Forms of exploitation include, but are not limited to, prostitution or other forms of sexual exploitation, forced labor or services, and slavery or practices similar to slavery.

We demonstrate respect when we:

- Treat others fairly and respectfully, as we would want to be treated ourselves.
- Never use violent, threatening, hateful, harassing, or intimidating behavior.
- Speak respectfully about individuals, peoples, countries, organizations, competitors, and clients.
- Use positive, open discussion to resolve problems and disagreements.

¹ See the Chemonics Policy Manual, 3.A2.

² See "USAID Acquisition Regulation (AIDAR)," 752.7037 Child Safeguarding Standards, and see "Standard Provisions for U.S. Nongovernmental Organizations," M27 Child Safeguarding.

³ FAR 52.222-50

BE A GOOD BUSINESS PARTNER



With the support of a USAID project, companies like *Pro Mujer Oriente* – a small business in the Ucayali province of Peru that works to support victims of domestic violence – have learned techniques to improve the quality of their products, lower costs, and increase income.

BE A GOOD BUSINESS PARTNER

Being a good business partner means dealing honestly and directly with clients, beneficiaries, subcontractors, suppliers, and other business associates. It means representing services and qualifications truthfully when marketing or negotiating.

Being a good business partner means entering into commitments carefully, only creating expectations we can meet, and making promises we can keep. It means faithfully honoring the commitments we do make, even when we have no contractual or written obligation to do so.

We strive to make business expectations and commitments explicit, so that misunderstandings do not arise. We all share the obligation to be familiar with our procedures, especially those that involve communicating information about our services, negotiating contracts, and entering into and executing other kinds of company agreements.

In keeping with the high standards that are part of Chemonics' culture, we:

- Deal honestly with clients, beneficiaries, subcontractors, consultants, suppliers, and staff.
- Represent Chemonics' qualifications and the credentials of staff, subcontractors, and consultants accurately and without exaggeration.
- Enter into agreements with consultants, potential employees, and other organizations only if expressly authorized to do so.
- Honor our word, whether written or spoken.
- Deliver what we promise, including fulfilling contractual obligations and other business commitments in good faith.
- Make every effort to do excellent work and provide competent service.



KEEP COMPLETE AND TRUTHFUL RECORDS



Pharmacies like the AMREF Clinic in Nairobi, Kenya are able to deliver high-quality antiretroviral drugs to more than 350,000 patients across the country with assistance from a USAID-funded pharmaceutical supply chain project.

KEEP COMPLETE AND TRUTHFUL RECORDS

Our reputation as individuals and as a company depends on the trust we inspire in others, including clients, supervisors, or other people to whom we are accountable. Trust is built in part on the completeness and accuracy of our financial statements and documentation, written records, and verbal statements. Each of us is responsible for ensuring that all financial records, including our work time, travel, materials, and other expenses, are recorded accurately and completely.

Chemonics uses company funds only for purposes that are properly justified and can be independently verified. Chemonics also expects accurate recordkeeping and disclosure because of the company's commitment to transparency in the expenditure of public funds.

Chemonics follows Generally Accepted Accounting Principles and complies with Financial Accounting Standards Board guidelines to manage and report financial information. In addition, the company is regularly audited by the Defense Contract Audit Agency (DCAA) of the United States Government. We believe that audits and associated recordkeeping help us remain vigilant in meeting our obligations to our clients and the public.

We have a responsibility to:

- Record transactions completely and accurately. We never alter documents to conceal, exaggerate, or falsify information.
- Make or approve payments only if they will be used for an authorized and specified purpose.
- Record work time accurately, on the day the work was performed, and to the appropriate billing code.
- Make sure all cost and pricing statements are complete, accurate, and current when negotiating contracts related to U.S. government work.





PROTECT CHEMONICS AND CLIENT ASSETS



To support private land ownership and the development of a market economy, a project in Kyrgyzstan trained activists to educate and advise villagers across the country on their rights and obligations.

PROTECT CHEMONICS AND CLIENT ASSETS

Chemonics assets – and those of the U.S. government and other clients at our disposal – are meant for business, not personal, use. We all have a duty to ensure that these assets are used properly and responsibly.

Company assets include a wide range of resources, from office equipment to vehicles, computer hardware and software, telephones, e-mail, Internet services, time at work and work product, proprietary company information, printed and electronic documents, trademarks, intellectual property, and other assets.

Chemonics is committed to putting the power of information technology in the hands of employees worldwide. Technology makes it easy to collect and store data. As a result, we have access to sensitive information about the firm, its employees, consultants, and partners. We have a duty to protect and handle information carefully, treating it as we would any other valuable corporate asset.

The responsible use of assets extends equally to government assets and assets of other institutions or individuals. We must report to a supervisor any situation that threatens the security or condition of corporate, government, or other legally protected assets.

We have a responsibility to:

- Use assets as Chemonics and the U.S. government or other clients authorize them to be used. We consult applicable regulations or an authorized Chemonics representative for permission to borrow, loan, or dispose of Chemonics or government property.
- Use Chemonics' telephones, faxes, e-mail, and Internet for Chemonics business. We never use them for illegal activity, gambling, pornography, or outside business interests.⁴
- Use information provided through Chemonics systems for Chemonics business purposes only.
- Protect proprietary information that gives, or may give, Chemonics a competitive advantage.
- Protect sensitive information about employees, consultants, or subcontractors.
- Follow laws governing the use of intellectual property, including software licenses, patents, copyrights, and trademarks.⁵
- Get owner permission in writing before disclosing or using the proprietary information or assets of another institution or individual, or their patented or copyrighted assets. We use written or visual material – including photographs and quotations – only with proper attribution or permission.

⁴ See the Chemonics Policy Manual, 12.F1.

⁵ See the Chemonics Policy Manual, 12.F1.

MAINTAIN OBJECTIVITY IN DECISION MAKING



A Water Operators Certification Program established by Chemonics in Jordan helps to improve public water quality and availability, optimizes water and wastewater treatment facility productivity, and creates critical job opportunities for vulnerable populations such as women, youth and rural workers.

MAINTAIN OBJECTIVITY IN DECISION MAKING

In making sound business decisions, we strive to ensure that our professional objectivity is not compromised. Our judgment, choices, and actions can be impaired if our private interests interfere with the company's interests.

We safeguard our objectivity by avoiding financial, business, and other relationships that might compete with company interests. We expect our staff to be extremely cautious, scrupulously avoiding even the appearance of a conflict between our duties as employees and our personal interests.

Since conflicts of interest do arise from time to time, even in good faith, we expect staff to disclose all potential conflicts freely and promptly to supervisors, and to work with Chemonics to resolve conflicts in a mutually satisfactory way.

To maintain objectivity and independence in our work, we:

- Honor our responsibilities to Chemonics and its clients by avoiding business and financial actions, relationships, or situations that might conflict — or create the appearance of a conflict — with our loyalty to Chemonics or the projects we manage.
- Promptly disclose all potential conflicts of interest to a supervisor, and seek advice to resolve them.
- Don't engage in any business activities, investments, or loans in the country to which we are assigned, unless we are a citizen or legal resident of that country or have Chemonics' express approval.⁶
- Request prior written approval from Chemonics' president before maintaining a financial interest, through direct or indirect ownership, in a business that does or seeks to do business with, or is in competition with Chemonics.
- Don't use proprietary information belonging to Chemonics, its partners, or suppliers (or pertaining to Chemonics' relationship with these parties) to influence personal decisions or the decisions of others regarding investments in any country in which Chemonics works.
- Participate in social causes or in civic, political, or religious activities unrelated to Chemonics' work only on our own time and at our own expense.
- Remember that when we are in a country other than our own, we represent the U.S. government as well as Chemonics and should not interfere in the internal political affairs of the host country.

⁶ See the Chemonics Policy Manual, 4.B2.

THINK CAREFULLY BEFORE GIVING OR ACCEPTING BUSINESS FAVORS



Nigerian cocoa farmers like Sunday Dada are smiling again because the USAID MARKETS project brought hope back to Nigerian cocoa production. Cocoa farmers who were trained on and applied improved cultural practices like pruning increased their yields from .47 tons per hectare to .63 tons in 2011.

THINK CAREFULLY BEFORE GIVING OR ACCEPTING BUSINESS FAVORS

Business partners, current or potential suppliers, subcontractors, vendors, and other business acquaintances may offer us business favors. Favors might typically include gifts, meals, entertainment, discounts, travel and transportation, lodging, goods, or services.

Even when such favors are of very little monetary value, we need to be alert to the possibility that they may influence our business decisions improperly or create the appearance of doing so. In deciding whether to give or accept a favor, we should ask ourselves the following questions:

- Does a business favor compromise my judgment?
- Does it create a feeling of obligation?
- Could it affect my choice or use of a subcontractor or supplier?
- Does it influence the business relationship improperly?
- Does it create any doubt about my reputation or that of Chemonics?
- Does it give even the appearance of favorable treatment or impropriety?

If the answer to any of these questions is yes, the favor should not be offered or accepted.

At Chemonics, we:

- Do not accept or offer business courtesies of any value, if they could be perceived as affecting our objectivity or influencing business decisions.
- Adhere to the monetary guidelines in Chemonics' policy manual in situations involving business courtesies to or from non-government employees, such as current or potential suppliers or subcontractors.⁷
- Make sure we abide by current U.S. government restrictions on gifts, services, entertainment, or other benefits to U.S. government employees.⁸
- Return any gifts that do not meet these criteria, with a letter explaining Chemonics' policy. If a gift is impractical to return, management may make it available to all staff or donate it to charity.

⁷ See the Chemonics Policy Manual, 4.B3.

⁸ 5 Code of Federal Regulations (CFR) Part 2635.



PROMOTE FAIR AND HEALTHY COMPETITION



A primary education program in Georgia uses groundbreaking software to tailor hundreds of children's stories precisely to a particular grade level, increasing literacy among Georgian elementary students.

PROMOTE FAIR AND HEALTHY COMPETITION

Chemonics seeks to maintain a level playing field in the course of doing business. We foster fair play and promote healthy competition to keep our industry dynamic and robust. When a party has an unfair advantage, competition is stifled. The public and foreign assistance beneficiaries feel the negative consequences.

Chemonics rigorously observes U.S. laws and regulations that prohibit practices that may reduce competition. These laws govern a wide range of our business activities, including setting prices, purchasing, and selling and marketing our services.

An example of an anti-competitive practice would be a collusive bidding scheme where a group of companies with the capability of providing the same services conspire to exchange bid information, and take turns submitting the low bid. Another example would be if a competitor offered Chemonics money not to bid on a contract.

As a point of clarification, the teaming agreements Chemonics uses do not constitute an unfair restriction of trade, because the company is not, through a teaming agreement, colluding with other prime contractors on price.

Laws and regulations concerning fair competition can be quite complex. Consult with a supervisor or the Chemonics Risk Management Division for answers on specific situations.

As leaders, we:

- Promote competition that is fair and honest.
- Arrive at prices in our proposals independently, without disclosing these prices to any organization that is submitting a proposal, as required by the Federal Acquisition Regulation (FAR).
- Never enter into agreements or understandings with competitors concerning prices or other collusive bidding practices.
- Never enter into agreements or understandings with competitors to allocate or divide markets, or rotate or alternate submission of bids or proposals. One example would be an agreement that Chemonics will bid on contracts in one technical field, while a direct competitor will bid on contracts in a different field.

UPHOLD THE INTEGRITY OF THE PROCUREMENT PROCESS



A financial services project in South Africa expanded access to financial services and lower financing costs for historically disadvantaged small and medium enterprises.

UPHOLD THE INTEGRITY OF THE PROCUREMENT PROCESS

U.S. government procurement integrity regulations are designed to ensure that contractors don't have an unfair advantage when competing for government contracts. Employees, consultants, subcontractors, and authorized representatives must observe these regulations carefully, avoiding actions that give us real or perceived unfair competitive advantages.

We are prohibited from obtaining any government source selection information or contractor proposal information, if that information is not available publicly. Source selection information includes competitive range determinations, rankings of proposals or competitors, and reports and evaluations of government source selection panels.⁹ Contractor proposal information includes proposed costs or prices, and indirect costs and direct labor rates.¹⁰ Similarly, we can't have access to pre-solicitation scopes of work unless the information is available publicly.

If we have any doubt about Chemonics' right to receive certain information, we should ask the person offering the information to confirm the propriety of the exchange.

If source selection or contractor proposal information is improperly disclosed to us, or we are unsure as to whether it is proprietary or source selection information, we must report it immediately to our supervisor and to the Chemonics Risk Management Division.

We uphold government procurement integrity when we:

- Seek information for the preparation of proposals aggressively yet always fairly.
- Don't seek, accept, or use government source selection information, such as technical evaluation plans.
- Respect competitors' confidential or proprietary information, such as cost or pricing data submitted to the government as part of a proposal. We don't seek, receive, or use this information.
- Always refuse proprietary or source selection information that improperly comes into our possession, and immediately report the incident to a supervisor.

⁹ See Federal Acquisition Regulation 2.101 and 3.104.

¹⁰ See Federal Acquisition Regulation 3.104 and 41 United States Code (USC) 423.

EXERCISE INTEGRITY IN RECRUITING AND HIRING



A sustainable agriculture project in Afghanistan established a network of veterinary field units to provide herders with access to medicines and vaccines for their livestock, thereby strengthening food security and incomes.

EXERCISE INTEGRITY IN RECRUITING AND HIRING

Chemonics is firmly committed to providing equal opportunity in all aspects of employment. These commitments require us to be thoughtful, careful, and thorough in recruiting and hiring competent people. In all our dealings, we treat job applicants with dignity and respect.

As a U.S. government contractor, we have special responsibilities with regard to employment of current and former U.S. government employees.

Current and former USAID employees are subject to complex laws and regulations that may limit the company's ability to recruit and hire these individuals.¹¹ The U.S. government has these guidelines to restrict companies from gaining an unfair competitive advantage. Our responsibility to strictly follow these guidelines is closely linked to our desire to promote fair and healthy competition, uphold the integrity of the procurement process, and avoid conflicts of interest.

We do not enter into employment-related discussions with government employees who have had, or will have, a role in awarding or managing our contracts.¹² USAID employees are also subject to certain restrictions on their activities after they leave government service.

In summary, we:

- Recruit and hire people in a responsible manner, by treating others with respect and without discrimination.
- Promote child-safe screening procedures for the people we hire, particularly anyone whose work may involve direct contact with children.
- Notify a supervisor and the Office of Business Conduct if a current or former USAID employee contacts us regarding employment at Chemonics.
- Don't discuss employment possibilities with USAID officials who are participating in a procurement for which Chemonics is competing.

¹¹ See 5 CFR 2635-2641, 41 USC 423 (the Procurement Integrity Act), and 18 USC 207.

¹² See the Chemonics Policy Manual, 1:K; 2.G.



FOLLOW U.S. LAW AND INTERNATIONAL AGREEMENTS ON CORRUPTION



A new automated customs inspection and clearance system developed with the support of a business policy reform project in Mongolia is facilitating trade and supporting economic growth.

FOLLOW U.S. LAW AND INTERNATIONAL AGREEMENTS ON CORRUPTION

Wherever it exists, corruption undermines the health and credibility of social, economic, and democratic institutions.

Chemonics takes a strong position on U.S. law and international agreements on corrupt business practices. We take the necessary steps to make sure the company, its staff, authorized representatives, and subcontractors comply with the U.S. Foreign Corrupt Practices Act, the Anti-Bribery Convention of the Organization for Economic Cooperation and Development (to which the United States is a signatory), the U.K. Anti-Bribery Act, and similar laws and regulations in countries in which we work.

We don't make payments or offer anything of value to government officials to influence their official acts or decisions, obtain or retain business, direct business to any person, or secure any improper advantage.

If we are solicited for money, favors, or anything of value by or on behalf of a government official to obtain or retain business, we must immediately report the incident to the chief of party, the director of the project in Washington, D.C., or Chemonics' Office of Business Conduct.

In addition, offering, providing, soliciting, or accepting any money, fee, commission, credit, gift, gratuity, object of value, or compensation to improperly obtain or reward favorable treatment on a government contract or subcontract is called a kickback and is a crime.¹³

Under limited circumstances, we may reimburse government officials for meals, entertainment, transportation, or lodging expenses in connection with performance of a contract or other business reasons. These reimbursements can only be made if they are consistent with other principles and standards in this document, and with Chemonics policy and USAID regulations, and allowed under U.S. and local law.¹⁴

In keeping with our commitment to integrity, we:

- Never offer anything of value to a government official to obtain or retain business, either directly or through an intermediary.
- Never accept anything of value from a subcontractor, vendor, grantee, or supplier for, or because of, improper favorable treatment on a government contract or subcontract.
- Never directly or indirectly solicit, offer, or accept bribes or kickbacks in any form.

¹³ See Federal Acquisition Regulation 3.502.1 and 41 USC 51-58.

¹⁴ See the Chemonics Policy Manual, 4.B3.

GETTING ASSISTANCE AND RAISING CONCERNS

We provide guidelines in this document to address situations we are likely to encounter as a company and as employees. At times, however, we may face complex issues that have no apparent precedent, or for which there is no easy answer. We need to work together to find solutions in these circumstances. So what should you do if you:

- Want more information?
- Have a question?
- Need advice on what to do?
- Think you've made a bad decision?
- Think someone else has made a mistake?

A number of resources in the organization are available to help you get advice, resolve conflicts, or report possible violations of these standards. If you need help:

- In most cases, try to work out issues with colleagues directly. If this effort is unsuccessful, talk with a supervisor.
- If a situation requires special knowledge from the Finance and Administration, Human Resources, or Risk Management Divisions, contact a leader in those departments. In cases involving alleged harassment, contact the senior vice president of Human Resources immediately.
- If you work outside the United States, discuss concerns with the chief of party or a Chemonics senior vice president.
- Report inappropriate behavior by a chief of party to the director of the project in Washington, D.C., to a senior vice president, to the president, or to the Office of Business Conduct.
- Contact Chemonics' Office of Business Conduct at BusinessConduct@chemonics.com or use Chemonics' HelpLine at 888.955.6881 (WhatsApp: +1.202.355.8947). Our Office of Business Conduct is an additional resource to help employees determine the right course of action in difficult situations. Employees, consultants, subcontractors, suppliers, clients, and other concerned parties should contact the office regarding possible violations of Chemonics' standards, company policies, or government laws and regulations.
- Submit a concern online at: www.chemonics.com/reporting. Reports may be made anonymously or directly.

We expect our leaders to support employees who come forward to discuss questions or concerns about business conduct. It is our firm policy that no retaliation in any form shall be allowed for good faith reporting of suspected misconduct. U.S. law also protects employees who report concerns involving fraud, waste, abuse, or other violations of laws or regulations that they reasonably believe have occurred.

Chemonics conducts inquiries into or investigations of all reports. Chemonics makes every effort to maintain confidentiality or anonymity to the extent possible under the law; however, disclosure may be necessary in some cases to conduct an investigation effectively.

If substantiated, violations are resolved through appropriate corrective action or discipline, including termination of employment. Violations also may result in civil or criminal penalties.

INDEX

Accurate company records	11
Anti-competitive business practices	19
Asking questions	3, 26
Avoiding conflicts of interest	15
Bid rotation	19
Bid suppression	19
Books and records	11
Bribes	25
Business conduct office	26
Business courtesies	17
Business expenses	11
Business records and documents	11
Collusive bidding	19
Company assets/resources	13
Company proprietary information	13
Company values	1
Competitive information	13, 21
Competition laws	19
Competitors' information	21
Competitors, ownership interest in	15
Computer networks	13
Computer use	13
Confidentiality	26
Conflicts of interest	15
Consultants	2, 9, 21
Company policies	2, 3
Corrupt business practices	25
Disciplinary action	26
Discrimination	7, 23
Diversity	7
E-mail	13
E-mail for personal use	13
Employment discrimination	7, 23
Entertainment	17
Fair competition and pricing	19
Financial interests	15
Financial records	11
Financial reporting	11
Financial statements	11
Foreign Corrupt Practices Act (FCPA)	25
Gifts	17
Giving gifts	17
Government; dealing with	23, 25
Government officials	23, 25
Gratuities (to public officials)	25
Harassment	7
Help line; Help resources	26
Hiring employees	23
Hiring; government employees	23
Improper payments	25
Information technology	13
Intellectual property	13
Internet usage	13
Intimidation	7
Investigations	26
Kickbacks	25
Labor charging	11
Market division	19
Meals	17
Misusing company property, records, or funds	13
Non-retaliation	2, 26
OECD Convention	25
Personal business, using company time or resources for	13, 15
Personal financial interests	15
Personal relationships	15
Personal use of company resources	13
Physical assets	13
Policies	2, 3
Price fixing	19
Pricing information	11, 19, 21
Procedures	2
Procurement	17, 21
Proprietary information	13, 21
Questions	26
Receiving gifts	17
Records	11
Relationships with subcontractors and suppliers	9, 17
Reporting concerns and violations	2, 3, 26
Respect	7, 23
Retaliation	2, 26
Sensitive information	13
Sexual harassment	7, 26
Source selection information	21
Timesheets	11
Trafficking in Persons	7
Unfair competition	19, 21
Use of company resources	13
Values	1, 3
Vehicles	13
Whom to contact for advice or assistance	3, 26





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