



Welcome the stranger.
Protect the refugee.

HIAS Code of Conduct

Introduction

In keeping with its vision, mission, and values, HIAS is committed to maintaining the highest degree of ethical conduct among all its associated Personnel¹ and organizations that collaborate with HIAS. To help increase understanding, this Code of Conduct details HIAS' expectations of Personnel in key areas.

Scope and purpose

This Code of Conduct applies to all HIAS Personnel. It aims ensure that HIAS operates in a manner consistent with its vision, mission, and values.² Organizations that collaborate with HIAS are expected to have a Code of Conduct that aligns with HIAS' or adopt HIAS' Code of Conduct for use by all staff and volunteers. A separate Supplier Code of Conduct applies to HIAS vendors and suppliers.

This Code of Conduct sets out the conduct expected of HIAS Personnel while under contract to the organization or with a legally binding relationship. It forms part of all employment contracts or binding relationship agreements. The principles defined in the Code of Conduct are to be

¹ "Personnel" include employees, board members, consultants, contractors, fellows, interns, or volunteers, or others working on behalf of HIAS in any HIAS global location or on behalf of HIAS in a non-HIAS location.

²Vision

HIAS stands for a world in which refugees find welcome, safety and opportunity.

Mission

Drawing on our Jewish values and history, and working with host communities, HIAS provides vital services to refugees, asylum seekers, and other forcibly displaced and stateless persons around the world and advocates for their fundamental rights so they can rebuild their lives.

Values

Welcome • Acogimiento • Hospitalité • הכנסת אורחים (Hachnasat Orchim)

We Welcome the Stranger

Justice • Justicia • Justice • צדק (Tzedek)

We Pursue Justice

Empathy • Empatía • Empathie • חסד (Chesed)

We Approach our Clients with Empathy

Partnership • Compañerismo • Coopération • חברותא (Chevruta)

We Believe in Changing the World through Partnership

Courage • Coraje • Courage • אומץ (Ometz)

We Act with Courage to Build a Better World

Resilience • Resiliencia • Résilience • רוח (Ruach)

We Adapt and Thrive, Continuously Demonstrating our Resilience



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upheld by HIAS Personnel inside and outside the workplace at all times, whether or not “on duty” for HIAS. Breaches of the Code of Conduct are grounds for disciplinary action, up to and including termination of employment, contract, agreement, or relationship with HIAS. Failure to report a violation of the Code of Conduct is itself a breach of the Code of Conduct.

Although local laws and cultures differ from one country to another, HIAS’ Code of Conduct is consistent with international and UN standards and is binding in all contexts. HIAS Personnel are expected to adhere to the Code of Conduct and abide by local laws and regulations. Where local law is stricter than the Code of Conduct, local law takes precedence. If local law is absent or less strict, the Code of Conduct standard shall apply.



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Code of Conduct Standards

HIAS Personnel agree as follows:

1. Adherence to Law, HIAS Values and Policies, and Humanitarian Principles

- 1.1 I will abide by all applicable laws and HIAS policies. I will be sensitive to local customs.
- 1.2 I will promote and adhere to HIAS' values of welcome, justice, empathy, partnership, courage, and resilience.
- 1.3 When acting on behalf of HIAS, I will adhere to the core humanitarian principles of humanity, neutrality, impartiality, and independence.
- 1.4 I will not take part in any form of corruption, including bribery, theft, or fraud. Fraudulent acts include but are not limited to forgery, alteration of a document, or falsifying a time sheet, business record or document. (Further information can be found in HIAS' Anti-Corruption and Anti-Fraud Policy.)
- 1.5 I will not provide or receive any monetary assistance or engage in a relationship with any individual or entity that is a known terrorist or terrorist group, or any individual or entity that is found in applicable sanction lists checked by HIAS.
- 1.6 I will not work under the influence of any substances, such as alcohol or legal or illegal drugs, that may influence my judgment, or jeopardize the safety or security of others on HIAS premises or work sites.
- 1.7 I will not be in possession of illegal substances on HIAS premises or work sites.

2. Conflicts of Interest

- 2.1 I will perform my personal duties and conduct myself in a manner that avoids any real or perceived conflicts with the interests of HIAS.
- 2.2 I will declare any real or perceived financial, personal, intimate, or familial conflicts of interest in matters of official business, either financial or non-financial -- in accordance with HIAS' Global Staff Conflict of Interest Policy (for staff) or the HIAS Conflict of Interest Policy (for board members and Key Officials).
- 2.3 I will not be involved in awarding benefits, contracts for goods or services, or employment or promotion within HIAS to any person with whom I have a financial, familial, or potentially compromising personal relationship.
- 2.4 I will not solicit any gift for myself personally in connection with my employment or relationship with HIAS.
- 2.5 I will not accept cash of any value or gifts worth more than the equivalent of \$50 USD at a time (or \$150 per year in total) from anyone as a part of my service with HIAS, per the Anti-Corruption and Anti-Fraud Policy. A Country Office, with the concurrence of the Regional Director, may establish a lower limit on the value of acceptable gifts.

3. Treatment of Others

- 3.1 I will always treat all people with respect and dignity.
- 3.2 I will not sexually, physically, or emotionally abuse others.
- 3.3 I will not engage in discrimination, harassment, sexual harassment, bullying, or abuse of power.



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- 3.4 I will not recruit or utilize children (defined as under 18 years of age) for labor which could be harmful or hazardous, prevent children from attending school or participating in typical childhood activities or that violate local child labor laws, consistent with the standards of the International Labour Organization.
- 3.5 Particular Considerations in the Treatment of HIAS Personnel and Partners
 - 3.5.1 I will ensure all relationships with co-workers and those working on behalf of HIAS are respectful and appropriate.
 - 3.5.2 I will support equal opportunities and promote a respectful work environment that honors the dignity and worth of each individual, in line with HIAS' Diversity, Equity, and Inclusion Statement.
 - 3.5.3 If I am in a senior management or supervisory role, I will not make romantic or sexual advances or engage in any romantic or sexual relationship with anyone in a position over which I have direct or indirect authority. Further information can be found in HIAS' Anti-Discrimination, Harassment, Bullying and Abuse of Power policy.
 - 3.5.4 I will not engage in a romantic or sexual relationship at work that involves improper use of power, rank, or position.
 - 3.5.5 I will disclose any romantic or sexual relationship with a HIAS colleague to HR in my country office, regional office, or headquarters, as soon as practicable when such relationship occurs. I understand I may be asked questions about a relationship to ensure it is welcome, voluntary, and consensual, and without any form of coercion, exploitation, or abuse of power.
- 3.6 Particular Considerations in the Treatment of Program Participants
 - 3.6.1 I will not engage in any activities that commercially exploit others, including forced labor, human trafficking, or conduct that contributes to human trafficking.
 - 3.6.2 I will not hire any current HIAS program participant for personal services, such as house cleaning or childcare.
 - 3.6.3 I will not exchange money, employment, goods or services for sex, sexual favors or any form of humiliating, degrading, or exploitative behavior. This also includes any exchange of assistance due to program participants.
 - 3.6.4 I will not engage in a romantic or sexual relationship with a program participant. (If I am a "HIAS community worker," I will immediately disclose to HR any romantic or sexual relationship with a program participant.) I understand I may be asked questions about a relationship to ensure it is welcome, voluntary, and consensual and without any form of coercion, exploitation, or abuse of power.
 - 3.6.5 I will not take photographs or videos of program participants without their written consent and will not publicize these without their permission.
 - 3.6.6 I will not publish photographs, videos or other personally identifiable information of program participants for personal purposes, including my social media accounts.
 - 3.6.7 I will immediately report any knowledge, concern, or suspicion of conduct that violates HIAS' PSEA Policy or Anti-Human Trafficking Policy.



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- 3.7 Particular Considerations in the Treatment of Children (defined as under 18 years of age)
 - 3.7.1 I will place the rights of the child at the center of the HIAS' activities and seek to ensure the best interests of children. Centering the rights of the child and best interests of the child applies even if it conflicts with local standards.
 - 3.7.2 I will immediately notify HIAS if I have been involved in any incident of child abuse that might affect my suitability to have contact with children in my duties.
 - 3.7.3 I will not cause harm to children through sexual, physical, neglect, or exploitation.
 - 3.7.4 I will not engage in any form of physical discipline with children who are program participants.
 - 3.7.5 I will not engage in sexual activity or a romantic relationship with children. Mistaken belief as to the age of a child is not a defense.
 - 3.7.6 I will avoid being alone with a child where I cannot be observed by others, unless necessitated by my job function.
 - 3.7.7 I will not make unsolicited, personal contact with children who are or were program participants via any means, including social media, except as necessitated by my job function.
 - 3.7.8 I will not take photographs of children who are or were program participants without the child's consent or assent (depending upon age and developmental level) *and* that of their parent or guardian. I will not publicize these for professional or personal reasons without the written consent of the parent or guardian.
 - 3.7.9 I will immediately report any knowledge, concern, or suspicion of conduct that violates HIAS' Child Safeguarding Policy.

4. Integrity and Accountability

- 4.1 I will promote integrity and accountability and immediately report a violation of the law, HIAS policy, or this Code of Conduct.
- 4.2 I will not retaliate against anyone who reports a violation of an applicable law, rule, regulation, HIAS policy, or this Code of Conduct, per the HIAS Whistleblowing Policy and other policies.

5. Health, Safety & Security

- 5.1 I will seek to ensure the health, safety, security, and welfare of all HIAS Personnel, partners, and program participants.
- 5.2 I will adhere to all legal and HIAS health and safety requirements in force at my location of work or when traveling on behalf of HIAS.
- 5.3 I will comply with all global, country, or location-specific security policies and procedures. I will be proactive in informing management of any necessary changes to such guidelines.
- 5.4 I will behave in a manner so as to avoid any unnecessary risk to the safety, health, and welfare of myself and others, including partner organizations and communities with whom we work.



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6. Use of HIAS Property

- 6.1 I will be responsible for the proper use of information, assets, and resources to which I have access by reason of my employment with HIAS.
- 6.2 When interacting with the program participants, I will always wear or be in possession of HIAS apparel for identification purposes, unless prevented by security concerns.
- 6.3 I will account for all money and property entrusted to me by HIAS.
- 6.4 I will not use HIAS' work equipment, software, e-mail, or social media platforms to engage in or encourage activity that is in violation of applicable law.
- 6.5 I will not use a HIAS vehicle or office for sexual activity.
- 6.6 I will not use a HIAS vehicle or office for personal use without written authorization by the Country Director or departmental director.
- 6.7 I will not use HIAS' work equipment, including computers, cell phones, office walls, vehicles, and internet access, for the purposes of viewing, downloading, displaying, or disseminating material that is discriminatory, harassing, bullying, pornographic or sexually explicit in nature.

7. Confidentiality and Data Protection

- 7.1 I will exercise due care in all matters of official business. I will not divulge any confidential information relating to colleagues, work-related matters or any sensitive information unless legally required to do so or on a "need to know" basis.
- 7.2 I will respect the confidentiality of personal data. I will adhere to all HIAS policies and procedures and applicable laws to the protection of personal data.

Questions, Complaints, and Reports

HIAS Personnel are: (1) strongly encouraged to ask their supervisor or HIAS human resources about this policy and its application to any actual, potential or hypothetical acts; (2) required to report breaches of the Code of Conduct to HIAS' General Counsel by email (ethics@hias.org) , via www.hias.ethicspoint.com, via telephone (1-888-208-3103) in the US or via local number available on the website); and (3) responsible for knowing the formal reporting channels described in the below policies and procedures. HIAS Personnel are protected from retaliation by the Whistleblowing Policy and other applicable HIAS policies or procedures.

HIAS Personnel receiving reports of a violation of the Code of Conduct must refer the report immediately per the HIAS Whistleblowing Policy or other applicable policy.

Related Policies and Documents

- Information Security Policy
- Global Anti-Discrimination, Harassment, Bullying, and Abuse of Power Policy
- Board and Key Persons Conflict of Interest Policy
- Global Staff Conflict of Interest Policy



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- Whistleblowing Policy/Complaints Policy and Procedures
- Global Safety and Security Policies and Procedures
- Employee Handbook (where applicable)
- Anti-Corruption and Anti-Fraud Policy
- Safeguarding Policy for the Protection from Sexual Exploitation and Abuse (PSEA)
- Safeguarding of Children Policy
- Anti-Human Trafficking Safeguarding Policy
- Supplier Code of Conduct
- Diversity, Equity, and Inclusion Statement

Document Type: Board Policy

Version number: 2

Owner: Human Resources

Persons who prepared the document: Office of General Counsel & Human Resources

Person who approved the document: Board of Directors

Date of Approval: March 11, 2024

Date of next review: March 11, 2029



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Employee Code of Conduct Certification Form

I hereby affirm and acknowledge that I have received a copy of this Code of Conduct and I fully understand all the terms contained herein. I agree to comply with all terms of this Code of Conduct and to report violations of this Code of Conduct or related policies and procedures. I understand that it is my sole responsibility to ask any questions about this Code of Conduct and I confirm that I have had ample opportunities to do so.

I understand that if I do not comply with the Code of Conduct, if I fail to disclose violations of the Code of Conduct when I am aware of them, or if I intentionally conceal a violation of the Code of Conduct, that I may face disciplinary action. This includes a range of actions up to and including termination of my employment or other relationship with HIAS. I understand that failure in these areas could result in criminal or civil penalties or fines. I understand HIAS has the discretion to pursue legal action as it deems necessary.

I understand that this policy should be signed upon employment or relationship with HIAS and the January 1 every year thereafter.

Print Name: _____

Position or Affiliation with HIAS: _____

Signature: _____ Date: _____