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HIAS ANTI-CORRUPTION AND ANTI-FRAUD POLICY

I. Introduction

A. Policy Statement

HIAS is committed to conducting its operations around the world in an honest, ethical and lawful manner. We have a zero-tolerance approach to corruption and fraud of any kind. We will not tolerate misleading another party for the purpose of obtaining a benefit for oneself. Nor will we tolerate acting improperly to influence the actions of another party. As an international humanitarian organization whose mission it is to serve refugees, asylum seekers and other displaced persons, we are committed to acting professionally, transparently, fairly and with integrity and accountability in all of our dealings and relationships. We are committed to implementing and enforcing effective systems of control and prevention to counter corruption and fraud in all forms – including, but not limited to bribery, kickbacks, theft and extortion.

Corruption and fraud undermine organizational health by diverting valuable resources from important priorities, and by subverting democratic and civic values, public accountability and the rule of law. Corruption and fraud can cause significant harm to HIAS and its beneficiaries, including loss of current funding and grants; disqualification from future funding opportunities through suspension or debarment; and a significant loss of productivity, reputation and time. A contract or grant secured through corruption or fraud may be legally unenforceable and create critical business and operational uncertainty for HIAS’s partners, allies, affiliates, vendors and other stakeholders. Corrupt and fraudulent actions can also lead to the civil or criminal liability of HIAS and the wrongful actor (as defined herein).

B. Consequences of Corruption and Fraudulent Behavior

1. Financial Harm - harm that can be measured in monetary terms
2. Operational Harm - harm causing deficiencies or delays in the organization’s operations and activities
3. Reputational Harm - harm to the respect and trust of the organization

C. Risk Factors for HIAS

This Anti-Corruption and Anti-Fraud Policy (this “Policy”) expresses HIAS’s commitment to prevent, identify, report, investigate, and sanction corruption and fraud in order to minimize programmatic and financial risks to HIAS and comply with applicable law. From a broad perspective, the following risk factors carry the potential to threaten the stability or success of HIAS’s operations:

1. Operating in unstable, dangerous or corrupt environments.



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2. Operating in bureaucratically inefficient environments without an effective rule of law, or legal or administrative processes or remedies.
3. Misusing funds or poor accountability with direct cash-based intervention (CBI), food and commodity distribution and other direct refugee assistance programs.
4. Lack of adequate controls over financial and programmatic management.

II. Purpose and Scope

The purpose of this Policy is to guide HIAS Personnel (as defined herein) on the following:

1. Identification of different forms of corruption and fraud in order to prevent and mitigate them.
2. Responsibility of HIAS Personnel to abstain from involvement in corruption and fraudulent behavior.
3. Responsibility of HIAS Personnel to safely prevent, identify and report corruption and fraud.
4. Implementation and strengthening of procedures for the detection, investigation, and sanctioning of fraud and corruption.

HIAS Personnel are responsible for reading and consenting to this Policy in its entirety, including all footnotes.

III. Applicability

This Policy applies to and binds all HIAS staff and associated personnel (collectively referred to as “HIAS Personnel” and individually referred to as a “HIAS Person”). “HIAS Personnel” is defined as all: (i) permanent, fixed term and temporary staff; (ii) board members and any of their assistants authorized to access HIAS confidential and/or proprietary information; (iii) consultants, independent contractors and sub-contractors; (iv) third-party representatives and agents; and (v) volunteers, community workers, interns and public service or legal fellows, in each case who work on behalf of HIAS in any HIAS or non-HIAS global location.

This Policy also applies to external parties, such as HIAS’s partners and vendors, working with or receiving funding from HIAS. In short, this policy applies to HIAS Personnel and any individual or entity having a direct or indirect contractual relationship with HIAS, or an individual or entity that is funded, in whole or in part, with HIAS resources. This Policy forms a part of an employee’s terms and conditions of employment and may be subject to change at the discretion of management. Adherence to this Policy is mandatory, and non-compliance could lead to termination of employment or engagement with HIAS, and/or other legal or disciplinary action at HIAS’s discretion (consequences explained more fully below).



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All questions or requests for interpretation should be directed as indicated in the **Questions About This Policy** Section.

IV. Compliance and Laws

HIAS and HIAS Personnel are subject to the anti-corruption and anti-fraud laws of each country in which HIAS operates, as well as any other applicable legal or regulatory rules or codes of conduct that apply to HIAS's operations. HIAS and HIAS Personnel must also comply with all applicable anti-fraud, anti-bribery and/or anti-corruption policies of any funder or donor from whom HIAS receives funds.¹

It is a violation of this Policy for a HIAS Person to knowingly, willingly, intentionally, or recklessly commit a fraudulent or corrupt act (defined below) in the course of executing or purporting to execute his or her duties or while acting in his or her capacity as an employee of or in association with HIAS.

If any provision of this Policy conflicts with an applicable law or regulation, the law or regulation controls. In such a case, the remainder of this Policy shall remain in force and be construed as if the conflicting provision were deleted.

V. Definition of Corruption and Fraud and Their Various Forms

All acts of fraud and corruption can be categorized as either opportunistic or systemic. When the act is opportunistic, the wrongdoer seizes an isolated opportunity to use for improper gain. Systemic fraud or corruption involves fraud or corruption embedded in the system, rather than an isolated incident. Although both types of actions are harmful, systemic acts are much more of a threat and much more harmful to an organization.

Fraud is:

Any act or omission, including misrepresentation or concealment of a material fact, that knowingly or intentionally misleads, or attempts to mislead, a party to obtain a benefit, whether directly or indirectly, whether for oneself or for a third party.²

"Fraud" describes a broad range of dishonest or illegal activities. As observed by the U.S. Department of Justice, "fraud is defined by nontechnical standards and is not to be restricted by any common-law definition of pretenses." According to a U.S. Court of Appeals, when discussing fraud as a criminal offense, the court noted that fraud includes false representations, dishonesty, and deceit.

¹ For more information about the authorities and laws that underlie this Policy, please see the Endnote at the end of this Policy.

² This definition takes adopts UNHCR's definition of fraud contained in its Fraud Prevention Project Presentation, September 15, 2015, available at <https://www.unhcr.org/en-us/excom/icm/55f97a4812/fraud-prevention-project-unhcr-presentation-member-states-informal-consultative.html>.



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Corruption is:

*The abuse of entrusted power for private gain.*³

Whether a particular act constitutes corruption is a fact and context-based determination.

To minimize the risk of corruption, HIAS Personnel are expected to thoroughly assess and evaluate the qualifications and associations of all third-party agents, partners and vendors, and abide by HIAS's suspension and debarment process, which requires HIAS to screen every third party against U.S. and global sanctions lists. If HIAS Personnel have any doubt about the reasonableness of a stated price or quote, they should consult the HIAS Procurement Procedure to screen third-party vendors and partners for fairness and reasonableness in price and cost. Additional preventative measures will be discussed more fully below.

Below are common types of corruption:

A. Bribery⁴

The deliberate giving, paying, authorizing, accepting, offering or promising of money, a favor or anything of value in order to, directly or indirectly, wrongfully or illegally influence the judgment or conduct of a person.

An attempt to make or accept a bribe is sufficient to be liable. A supervisor who authorizes a subordinate to pay "whoever you need to" or "grease some hands" is also liable. There is no specific monetary threshold for an act to constitute a bribe. A bribe could be indirect; giving payments or gifts to the family members of a person as an indirect way of corruptly influencing that person is also a bribe.

Since persons in positions of trust, authority, or power are most commonly the targets of bribery, to the extent reasonable, HIAS Personnel should evaluate the qualifications and associations of all third-party agents, partners and vendors, including their business reputation and relationships, if any, with public officials or persons in positions of trust, authority or power.

³ Definition used by Transparency International, found at <http://www.transparency.org/en/what-is-corruption>.

⁴ This definition is inspired by the U.S. Foreign Corrupt Practices Act (FCPA), which makes it unlawful for certain persons and entities to pay foreign government officials to assist in obtaining or retaining business. Specifically, the anti-bribery provisions prohibit the willful use of an instrumentality of interstate commerce to offer or promise money or anything of value, directly or indirectly, to a foreign official to influence the official to do or not do an act in violation of his or her lawful duty, or to secure an improper business advantage. See guidance from the U.S. Department of Justice for more information: <https://www.justice.gov/criminal-fraud/foreign-corrupt-practices-act>.



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B. Theft (Larceny)⁵

The unauthorized taking of property from another with the intent to permanently deprive them of it.

C. Extortion⁶

The obtaining of property from another induced by wrongful use of actual or threatened force, violence, or fear, or under color of official right.

VI. Examples of Corruption and Fraud

The following examples of corruption and fraud are illustrative and by no means exhaustive or exclusive. Depending on the facts of the situation, a corrupt or fraudulent act or omission may violate more than one of the following non-exclusive categories of wrongdoing.

A. Fraud

1. A HIAS Person intentionally misleads HIAS to pay expenses that have not been incurred for HIAS or for HIAS-related work.
2. A HIAS Person in charge of conducting or supervising all or a part of an investigation intentionally misrepresents or conceals a material fact.
3. A HIAS Person deliberately forges, destroys, tampers with or falsely creates documents, records, accounting entries or other information in order to circumvent HIAS's financial, legal or operational controls.
4. A HIAS Person colludes with a supplier by falsely increasing the price that HIAS has to pay so he or she can take a percentage "commission."
5. A HIAS Person uses HIAS's name, without authorization, to procure goods or services not for HIAS' benefit.
6. A HIAS Person who has a company credit card charges authorized expenses to the card. The employee waits two months and then uses copies of the receipts to file for reimbursement of the same expenses as if he paid for the expenses out of pocket.
7. A HIAS Person creates false receipts and is paid inflated expense reimbursements.

B. Bribery

1. A HIAS Person offers money or a gift to a person to influence a procurement, tender, bid or grant proposal process.
2. A HIAS Person offers money or a gift to influence, secure or expedite the processing of a corporate or tax registration, or a permit or license.

⁵ <https://www.findlaw.com/criminal/criminal-charges/theft-overview.html>.

⁶ <https://legal-dictionary.thefreedictionary.com/extortion>.



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3. A HIAS Person offers money or a gift to an official to be exempted from, or obtain improper preferential treatment for, a regulation or law.
4. A HIAS Person offers money or a gift to a judge or other adjudicatory or judicial official in exchange for a favorable legal judgment, investigation or enforcement action, or for expediting or rewarding any action or procedure.
5. A HIAS Person offers money or a gift to secure a government or institutional contract, such as a cooperative agreement, grant, partnership agreement or other contract.
6. A HIAS Person offers money to the tax department to secure favorable tax treatment or evade taxes or penalties.
7. A HIAS Person offers to pay expensive personal travel and entertainment expenses for a person connected to HIAS or doing business with HIAS to obtain a personal benefit.
8. A HIAS Person pays the personal bills of a relative of a person connected to HIAS or doing business with HIAS to obtain a personal benefit.
9. A HIAS Person pays an excessive fee to a consultant or agent close to a person connected to HIAS or doing business with HIAS to obtain a personal benefit.
10. A HIAS Person receives a benefit for providing improper preferential treatment to a client, beneficiary or third party.

C. Kickbacks

1. A HIAS Person illicitly pays a regular fee, commission or percentage of profits or revenue to a person as a reward for referring business to or helping obtain a contract for HIAS. (This does not include legal broker's fees, finder's fees or royalties that are transparently documented and agreed to by both parties.)
2. A HIAS Person makes payments to a public official as a reward for awarding HIAS a grant or cooperative agreement.
3. A HIAS Person receives a benefit for improperly awarding or steering a contract to a third party.

D. Theft

1. A HIAS Person steals money from a HIAS bank account by illegally accessing the account or diverting money to or from HIAS.
2. A HIAS Person steals HIAS owned and/or rented assets, equipment, property or supplies, or misuses the same.
3. A HIAS Person distributing cash-based intervention withholds money from refugees and pockets the balance for him or herself.



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E. Extortion

1. HIAS Person threatens to withhold protection services if a beneficiary refuses demands for improper payment.
2. A HIAS Person threatens to file unfounded criminal charges against a sub-grantee unless they make a payment or otherwise take an action that benefits the HIAS Person.
3. HIAS Person threatens to cut off critical support to a beneficiary unless he or she provides sexual favors.
4. A HIAS Person distributing cash-based intervention withholds money from a refugee and pockets the balance for him or herself and then threatens to harm the refugee if they disclose the threat.

VII. Causes of Corrupt or Fraudulent Behavior

1. Incentives and pressures (Examples: expensive hobby, credit card debt, expensive family medical emergency)
2. Perceived opportunity (Example: perpetrator notices a weakness in prevention measures or believes he or she will not be caught)
3. Perceived slight (Examples: believing oneself to be undervalued, underpaid or mistreated at work; believing the organization spends money on the wrong things)

VIII. Indicators of/Contributors to Fraud and Corruption

1. Lack of checks and balances and supervision
2. Lack of transparency
3. Lack of written policies and procedures
4. Insufficient physical security
5. Missing electronic or hard copy, or duplicative documents/records
6. Missing signatures
7. Signatures by unauthorized persons or forged signatures
8. Attitude that rules don't apply to you
9. Lack of involvement by management in high profile or sensitive issues

IX. What Behavior is Permissible Under This Policy?

A. Certain Gifts and Hospitality

A small gift or token of esteem or gratitude is often an appropriate way to display respect, goodwill, and sentimental value for another person. Although a country office may choose to set a lower threshold, for purposes of this Policy, such gifts may be accepted if unsolicited and if they do not exceed



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the limits set by U.S. government regulation.⁷ (At the time this Policy was adopted, that limit is an aggregate market value per occasion of USD \$20, or \$50 in a calendar year from any one particular person (“20/50”). This 20/50 limitation is inclusive of gifts to related parties and family members as well.) Any exceptions to this limit must be approved in writing by the Chair of the Board of HIAS, Inc. or Chair or President of the governing body of the relevant HIAS-branded affiliate, as appropriate. As a general rule of thumb, gifts and hospitality must abide by the following principles:

1. Be given openly and transparently.
2. Be permitted under local law.
3. Be of nominal value (e.g., cab fare, coffee mugs, tote bags, reasonable meals, entertainment expenses or company promotional items that are unlikely to improperly influence an official) and provided only to reflect esteem or gratitude. The larger or more extravagant the gift (e.g., a television, resort vacation, regular wining and dining, plane tickets, luxury sporting event), however, the more likely it was given with an improper purpose.
4. Gifts or hospitality must not exceed the 20/50 United States dollar thresholds (or their equivalence in local currency).
5. Be given only occasionally, appropriately and unconditionally.
6. Not be intended to improperly influence or carry the appearance of improper influence. HIAS Personnel must consider how the recipient is likely to view the gift or hospitality.
7. Not be illegal, unethical or involve cash or cash equivalents (i.e., highly liquid assets that are easily convertible to cash).
8. Not be made, directly or indirectly, from a HIAS Person’s private bank accounts or personal funds in order to intentionally circumvent this Policy.

This Policy does not prohibit HIAS Personnel from personally attending and paying for an optional recreational, entertainment or educational event that is broadly offered to HIAS Personnel. For instance, a HIAS Person is permitted to pay for the cost of a dinner, bowling event, movie screening, amusement park ticket, alcoholic beverage, conference or other event offered by a third-party vendor, organization, HIAS partner or affiliate.

B. Reasonable and Good Faith (or Bona Fide) Expenditures

This Policy does not prohibit HIAS Personnel from providing certain reasonable and bona fide travel and lodging expenses to a third party, including a public official, where the expenses are directly related to the demonstration or explanation of HIAS’s services, or are related to HIAS’s execution or performance of a contract with a government or agency.

The following types of expenses are permissible under this Policy:

⁷ https://www.ecfr.gov/cgi-bin/text-idx?node=sp5.3.2635.b&rgn=div6#se5.3.2635_1204



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1. Travel and expenses to visit HIAS facilities or operations.
2. Travel and expenses for training.
3. HIAS services or programs demonstration or promotional activities, including travel and expenses for meetings.

HIAS Personnel should pay such expenses in compliance with guidance provided by HIAS Finance, including required supervisory approval(s). Some of these basic, good practice protocols include doing the following, where possible:

1. Pay all costs directly to travel and lodging vendors and/or reimburse costs only upon presentation of a receipt.
2. Do not advance funds or pay for reimbursements in cash.
3. Ensure that any stipends are reasonable approximations of costs likely to be incurred and/or that expenses are limited to those that are necessary and reasonable.
4. Ensure the expenditures are transparent.
5. Do not condition payment of expenses on any action by the public official or person of trust.
6. Obtain proper confirmation that payment of the expenses is not contrary to local law.
7. Provide no additional compensation, stipends or spending money beyond what is necessary to pay for actual expenses incurred.
8. Ensure that costs and expenses on behalf of the recipients will be accurately recorded in HIAS's books and records.

If expenses are reasonable, bona fide and directly related to the promotion, demonstration or explanation of HIAS's services or programs, or the execution or performance of a contract or grant, they will typically be permissible under this Policy. When in doubt, HIAS Personnel are encouraged to consult with their supervisor and the Office of the General Counsel (OGC) to determine whether a payment qualifies as a bona fide expenditure, taking into consideration the facts of the situation.

C. Necessary Payments Under Extortion or Duress

As an international NGO that operates in several high-risk and unstable environments, HIAS faces a very real risk of danger to its staff, operations and property. HIAS understands the need for HIAS Personnel to exercise prudent judgment in such situations and place the safety of our beneficiaries and personnel as the highest priority, and protect our property and resources.

Therefore, this Policy does not prohibit payments made in response to an extortionate demand under a genuine and imminent threat of physical harm, detention, life or safety. Similarly, this Policy does not prohibit payments made in response to ransomware attacks that threaten severe damage to HIAS property. Such payments are not made with the corrupt intent to wrongly or inappropriately influence



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a public official or a person in a position of trust. In such a situation, HIAS Personnel must follow appropriate HIAS safety and security protocols as best as possible under the leadership and supervision of HIAS's Chief Operating Officer or their designee. In addition, any such payments must be immediately reported to the CFIO, the President and CEO, the Chair of the Audit & Risk Committee, and the HIAS Board Chair. (NB: Although payments made due to extortion *must* be reported, other matters not involving extortion may also need to be reported. Please refer to the Risk Reporting Framework to determine whether reporting is required and, if so, to whom.)

D. Certain Facilitation Payments

Facilitation or expediting payments to officials are permissible if made in furtherance of routine, non-discriminatory governmental action. Examples of such routine governmental action include processing visas, providing police protection or mail service and supplying utilities like phone service, power, and water. Routine governmental action does not include a decision to award new business or to continue business with a particular party. Nor does it include acts that are within an official's discretion, or that would constitute misuse of an official's office. For example, paying an inspector to ignore the fact that the company does not have a valid permit to operate the factory would not be a valid facilitating payment.

Here are some examples where facilitation payments are acceptable:

1. Paying an official a small amount to have the power turned on at an office.
2. Paying routine fees to obtain permits, licenses or other official documents to qualify a person to do business in a territory, state or country.
3. Paying routine fees for processing governmental papers, such as visas and work orders.
4. Paying routine fees for police protection, mail pickup and delivery or inspections associated with contract performance.
5. Paying routine services fees for phone service, power and water supply.

As with any permissible act under this Policy, HIAS Personnel must also ensure the act is permissible under local law. Other countries' foreign bribery laws may not contain an exception for facilitating payments.

E. Preventative Measures

Fraudulent and corrupt acts can be significantly minimized by:

1. Strong awareness of prevention measures and potential harm caused by fraudulent and corrupt acts.
2. Compliance with HIAS's Code of Conduct.



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3. Having effective and confidential complaints and whistleblower processes in place.
4. Control mechanisms, such as clearly defined duties and authorities for each role, the use of adequate technological tools, solid record keeping, audits when appropriate, etc.

X. Record-Keeping

HIAS Finance, Country Directors, local finance managers, and other personnel with purchasing or supervisory authority maintain financial records and help implement appropriate internal controls to evidence the business reason for making payments to, and receiving payments from, third parties. Adequate record keeping acts as control against fraud and corruption.

HIAS Personnel must declare in writing to their supervisors any hospitality or gifts offered from one source at an aggregate value of over USD \$20 or more per occasion, or over \$50 in a calendar year. Such offers are subject to periodic review by HIAS Finance, or local finance managers, as appropriate, but must be reported to the CFIO if a gift value exceeds the 20/50 U.S. dollar thresholds (or their equivalents in local currency). HIAS Personnel must ensure that all expense claims relating to hospitality, gifts or expenses owed to third parties are submitted in compliance with HIAS policies and procedures. Such procedures include, but are not limited to, HIAS's Procurement Procedure and any SOPs or protocols implemented by HIAS Finance.

The bedrock principles of transparency, objectivity, and accountability form the foundation for internal record-keeping compliance at HIAS. Here are the major principles of record-keeping that HIAS Personnel must follow:

1. All accounts, invoices, memoranda and other documents and records relating to dealings with third parties, such as vendors, consultants, suppliers and business contacts, should be prepared and maintained with strict accuracy and completeness. No records shall ever be kept "off-book" to facilitate or conceal improper payments.
2. All transactions must be recorded with reasonable detail, accurately and fairly. HIAS Personnel may not mischaracterize a payment to conceal the fact that it is a bribe (e.g., mischaracterizing a bribe as a commission, royalty, consulting fee, travel and entertainment fee, miscellaneous expenses, petty cash withdrawals, supplier/vendor payments or write-offs).
3. The Chief Finance and Innovation Officer shall report annually to the HIAS, Inc. Board's Audit and Risk Committee on how this Policy is working.

IX. Reporting Corruption and Fraud

HIAS Personnel who have a reasonable belief that an act of corruption or fraud has been committed should report the matter pursuant to the processes set out in the HIAS Whistleblowing Policy. This



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policy can be found at: [HIAS Whistleblowing Policy adopted 2021.03.14 \(sharepoint.com\)](#). Reporting possible fraud or corruption through this channel may be done anonymously. Retaliation for such reporting is prohibited. However, knowingly making a false report may subject the Person to disciplinary action, up to and including termination.

HIAS reserves the right to create additional standard operating procedures (“SOPs”) for reporting, investigating and remediating corruption and fraud, as well as for enforcing this policy. Such SOPs, whether existing now or in the future, are incorporated herein by reference.

XIII. Investigations

The General Counsel (GC) shall be responsible for the conduct of investigations into allegations of corruption and fraud, and for ensuring the confidentiality of the process. Depending upon the nature of the allegation(s), the GC may involve other HIAS components or external parties to assist in an investigation. If the allegation involves or implicates the GC, the GC must recuse him or herself from the investigation and notify the HIAS Board, so that it can investigate the matter itself or appoint an impartial attorney(s) to investigate.

1. Any investigation will be a fact-finding exercise to determine whether misconduct has occurred. An investigation in and of itself is not a punitive action and should not be used as such.
2. Any investigation conducted by HIAS in connection with a complaint under this Policy shall be done according to internal HIAS procedures governing investigations.
3. The investigative body is to maintain objectivity, impartiality, and fairness throughout the investigative process. The investigation must be conducted independently and free from improper influence.
4. The investigative body’s objective will be to determine by a preponderance of the evidence (more likely than not), whether fraudulent or corrupt actions have occurred. The investigative body will not be responsible for determining the appropriate sanction.
5. Investigations will not be conducted into events that occurred more than five years ago.

X. Consequences of Non-Compliance or Violations

HIAS Personnel must comply with this Policy at all times. HIAS’s zero-tolerance approach to corruption and fraud should be communicated to all agents, suppliers, contractors and business partners at the outset of HIAS’s business relationship with them and as appropriate thereafter. Local managers and all CDs, with support from OGC, must ensure that their subordinates understand and are regularly trained on this Policy.



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Any person subject to this Policy who intentionally, knowingly, or recklessly violates this Policy, may be subject to the following actions, which are implemented by and through the Human Resources department. This list is not meant to be exhaustive:

1. Written reprimand
2. Recovery of money owed to HIAS or other victims by withholding salary or by other means
3. Demotion
4. Suspension of employment/engagement with or without pay
5. Termination of employment/engagement

An incidence of fraud or corruption may be referred to local or federal authorities, such as the police or a federal law enforcement agency, if the conduct is also considered a criminal act.

XI. Other Relevant HIAS Policies

This Policy should be read and applied in consistency with all HIAS Policies and Procedures, including but not limited to the following, all of which are hereby incorporated herein by reference:

1. HIAS's Code of Conduct;
2. HIAS Conflict of Interest Policy;
3. HIAS's Privacy Policy;
4. HIAS's Data Breach Policy;
5. HIAS's Information Security Policy;
6. HIAS's accounting and finance internal controls and policies;
7. HIAS's Whistleblowing Policy;
8. HIAS's Procurement Procedure;
9. HIAS's suspension and debarment internal controls and policies;
10. HIAS's Contract Review and Approval Procedure;
11. HIAS's Protection against Sexual Exploitation and Abuse policies and protocols;
12. HIAS's Safeguarding Policy; and
13. HIAS's Anti-harassment and discrimination policies and protocols.

To the extent that any term(s) conflict between these Policies and Procedures, OGC is responsible for providing a clear interpretation and application of the relevant term(s).

XII. Questions About This Policy

For any questions, comments or concerns about this Policy, please contact OGC.



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XIII. Changes and Updates to this Policy

HIAS reserves the right to make changes and updates to this Policy as required. If modified, the Policy will be communicated to all HIAS Staff and associated personnel and on HIASnet indicating the date of the latest revision.

[End. Revised: June 2, 2021]