



Code of Business Conduct and Ethics

APPLICATION AND RESPONSIBILITY

This Code of Business Conduct and Ethics (this “Code”) applies to each member of the Board of Directors of ChildFund International (“ChildFund”), employee, intern, volunteer (individual who freely provides their time and services without receipt of compensation) or consultant (professional whose expertise is provided for a specified period of time for a fee), while acting on behalf of ChildFund, (“Representative”). Each Representative is expected to read and become familiar with the ethical standards described in this Code and will be required upon initial employment or affiliation with ChildFund, and annually thereafter, to certify that he or she has read, understands and will abide by it.

The Code of Business Conduct and Ethics provides a statement of the expectations of ChildFund regarding the ethical standards that each Representative should adhere to while acting on behalf of ChildFund.

Upon recommendation of the Audit Committee of the Board of Directors (the “Audit Committee”), the Board established and updates the Code. The Audit Committee reviews it annually, recommending updates as needed, for Board approval. While ChildFund’s President and Chief Executive Officer, Vice Presidents, Regional Directors, International Office Directors and Country Directors (“Senior Management”) oversee the effective operation of this Code, each of our Representatives are responsible to comply with it.

WE VALUE

Promoting positive outcomes for children by:

- Basing our work on the best interest of the child
- Focusing on sustainable changes in the lives of children
- Supporting child rights and child agency

Demonstrating integrity, openness and honesty, including stewardship of all resources by:

- Being accountable to our stakeholders for actions and results
- Practicing good business ethics
- Being transparent in our relationships

Upholding the respect and value of the individual by:

- Upholding the intrinsic dignity and worth of every child
- Investing in and caring for our staff
- Building trusting relationships

Promoting diversity, equity and inclusion by:

- Being grounded in acceptance and respect for all individuals
- Providing fair treatment and equal access to opportunities
- Ensuring equity of opportunity in all aspects of employment
- Being concerted, supportive and respectful in promoting an environment where everyone feels included and supported

Fostering innovation and challenge by:

- Taking risks and being prepared to stand up for what we believe in
- Acting courageously
- Learning from our innovations and our mistakes

Proactively connecting and collaborating by:

- Building strong partnerships with others
- Striving for mutual understanding
- Fostering teamwork and cross-functional collaboration

Listing our values isn't enough. The following Code provides guidelines to help you consistently demonstrate these values, even when it may not be easy, and lets you know where to find help if needed.

ETHICAL DECISION MAKING

Doing the Right Thing

Having integrity or being ethical is not just about hiring “good people” and trusting them to do the right thing. Often, when things go wrong, it is good people who happen to find themselves in bad situations. This Code describes some of the risks that may cause you to violate the law or ChildFund standards.

We are counting on you to assist ChildFund and your fellow employees by letting us know when help is needed. The “Report Violations” section of this Code will help you know how to do so.

Know the law

You are subject to the laws and regulations of the country where you work, and you are expected to know the laws and regulations that relate to your job. Because we are a US company, US law may apply to conduct that occurs outside the US. If you are uncertain about which laws and regulations apply to you, please speak with your supervisor or another ChildFund official.

Know our policies

You may unintentionally violate laws or standards simply by being unaware of ChildFund policies and failing to follow them. While you are not expected to know all policies word for word, you are required to know ones that apply to your specific job function or level of responsibility. You should also have a basic understanding of issues covered by each policy. If you're not sure how a policy applies to your specific situation, ask your supervisor or other ChildFund official.

Show integrity

Unfortunately, some individuals intentionally set out to harm or steal from ChildFund. While ChildFund has controls in place to prevent such harm, no controls are ever fail-proof. If you identify controls you think are weak or invite trouble, alert your supervisor or any other ChildFund official.

Don't be pressured

Sometimes you may violate standards because you think doing so will help ChildFund's bottom line. You also may believe you are expected to violate a standard to meet a performance goal or budget. No matter what message you think you're getting, you are never expected to violate the law or a standard, nor should you ever feel encouraged or pressured to do so.

How You Can Help

When improper activity occurs, ChildFund is sometimes unaware until it is too late to correct the situation. Witnesses to such misconduct sometimes assume that others "already know" or that they "don't want to hear bad news." As a result, Senior Management doesn't get important messages and they can't fix things. We sincerely want you to tell your supervisor or others in the chain of command if something seems to be wrong – in fact, it is your obligation to let us know.

Let's Not Drop the Ball

Lastly, you may believe that if you raise an issue, no action will be taken, or worse, you will be penalized for taking a stand. Know that we will always treat employees with respect and dignity. ChildFund will not tolerate retaliation against an employee who files a complaint in good faith or participates in an investigation of a complaint.

If you are a manager, you are required to respond promptly to an employee's concerns. If you are unsure of how to respond, Global Assurance ("Assurance"), Global Human Resources ("GHR"), or the Office of the General Counsel ("GC") can assist you. Remember, even if you respond to an employee's concerns on your own, you must notify Assurance of any reports or complaints of violations of this Code.

DEMONSTRATING OUR VALUES

WE HELP PROTECT CHILDREN AND VULNERABLE ADULTS!

Safeguard Children

ChildFund is committed to safeguarding the interests, rights and well-being of children with whom it is in contact, to conducting its programs and operations in a manner that is safe for children, and to appropriately responding to concerns about children's safety and has documented this commitment in its Child Safeguarding Policy. ChildFund's Child Safeguarding Procedure explains the detailed processes and responsibilities in place to carry out these commitments.

Child Safeguarding Policy (GHR-POL-080)

Child Safeguarding Procedure (GHR-PRO-080)

Prevent Sexual Exploitation and Abuse (PSEA) Commitment

As a condition of your employment and by signing this Code, each of ChildFund's Representatives acknowledge and agree to the following six core principles relating to sexual exploitation and abuse of the Inter Agency Steering Committee:

1. Sexual exploitation and abuse by Representatives (including all staff and volunteers working on humanitarian and development programming) constitute acts of gross misconduct and are therefore grounds for termination of employment.
2. Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is not a defense.
3. Exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior is prohibited. This includes exchange of assistance that is due to beneficiaries.
4. Any sexual relationship between those providing humanitarian and development assistance and protection and a person benefitting from such assistance and protection that involves improper use of rank or position is prohibited. Such relationships undermine the credibility and integrity of humanitarian aid work.
5. Where a humanitarian or development worker develops concerns or suspicions regarding sexual abuse or exploitation by a fellow worker, whether in the same agency or not, he or she must report such concerns via established agency reporting mechanisms.
6. Humanitarian and development workers are obliged to create and maintain an environment which prevents sexual exploitation and abuse and promotes the implementation of their code of conduct. Managers at all levels have particular responsibilities to support and develop systems which maintain this environment.

Prohibit Trafficking in Persons

ChildFund strictly prohibits human trafficking in all forms. No Representative is permitted to engage in activities or practices that constitute, encourage, or support human trafficking and must immediately report any such activities they observe within or outside ChildFund.

WE RESPECT EACH OTHER!

Show Mutual Respect and Sensitivity

ChildFund's Representatives must treat each other and those with whom they interact with dignity and respect. Managers are held to an even higher standard, as consistently courteous communication with staff is their ethical responsibility. If managers routinely criticize and disparage their staff, especially in front of others, the terms, conditions, and/or reasonable expectations of employees for a cordial and civil work environment can be altered.

You should also show you appreciate the values, practices, and traditions of different ethnic and religious groups. You should be aware of local cultural beliefs and norms, respect unharmed local practices such as norms of dress and behavior and avoid demeaning local people and customs.

Prevent Harassment

In accordance with all applicable laws in the countries we operate, ChildFund is committed to providing a work environment free from harassment. Harassment includes any unwelcome verbal, physical, sexual or visual conduct, based on a protected characteristic, that creates an intimidating, offensive, or hostile working environment that unreasonably interferes with an individual's work performance or otherwise adversely affects an individual's employment opportunities.

But while not all forms of harassment necessarily violate the law, ChildFund considers harassment that is ongoing and pervasive such that it changes the work environment to be unprofessional and grounds for discipline, up to and including termination. Such harassment includes bullying, which is behavior or conduct that is directed at an individual or group and is offensive, intimidating, humiliating or threatening, unwelcome, unsolicited, and unreasonable, and occurs over a substantial period. Please note that bad management does not in itself constitute harassment.

Do Not Tolerate Sexual Harassment

Sexual Harassment is defined as unsolicited and unwelcome sexual advances, requests for sexual acts or favors, or other physical, verbal, electronic conduct, or visual displays of a sexual nature when:

1. Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment (such as hiring, compensation, advancement, promotion, or retention).
2. Submission to or rejection of such conduct by an individual is used as a basis for making employment decisions concerning the individual (e.g., treating an employee favorably for engaging in such conduct or unfavorably for refusing to engage in the conduct).
3. Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

Sexual harassment does not include non-offensive or occasional conduct of a socially acceptable nature. It refers to conduct which is unwelcome or offensive to the individual or harmful to morale, including threats, intimidation, sexual or abusive behavior, and/or coercion of any person.

Ensure Equal Opportunity and Non-Discrimination

In respecting and valuing the diversity among our employees and all those with whom we do business, Representatives are expected to foster a work environment free of all forms of discrimination, harassment, bullying and retaliation.

ChildFund is an equal opportunity employer and complies with all fair employment practice laws in the countries we operate, providing a workplace that is free from unlawful discrimination. Specifically, ChildFund strictly prohibits and does not tolerate discrimination based on race, ethnicity, age, color, religion, sex, marital status, sexual orientation, gender identity or expression, national origin, pregnancy,

disability, genetics or any other characteristic protected by law in all terms, conditions, and privileges of employment, including without limitation, recruiting, hiring, assignment, training, compensation, promotion, discipline and termination. This policy covers conduct occurring at ChildFund offices, workplaces, all work-related activities and virtually through ChildFund electronic systems. This policy applies to all Representatives, regardless of position, title, salary, or years of service.

Representatives will treat all employees and anyone with whom we work with respect and dignity. Representatives must not engage in any direct behavior that is offensive, intimidating, malicious or insulting. This includes any form of sexual or other harassment or bullying, whether individual or collective, and whether motivated by race, age, role, gender, gender identity, color, religion, country of origin, sexual orientation, marital status, dependents, disability, social class or political views

WE PROMOTE A SAFE, SECURE AND HEALTHY WORK ENVIRONMENT!

Maintain Workplace Health, Safety and Security

ChildFund strives to provide each Representative with a safe and healthy work environment, but we need your awareness and responsibility to be successful. You must follow safety and security policies and procedures and report unsafe conditions, equipment, or practices to your supervisor immediately. Although you are responsible for your own health, safety and security, you are also responsible for and accountable to each other. Never perform a job that you feel is unsafe or act in a manner that may increase risks to other Representatives or our partners, children in our programs, or members of the community.

Prevent Alcohol or Substance Abuse

ChildFund is committed to ensuring a substance-abuse-free working environment for all Representatives. The use of illegal drugs or alcohol in the workplace will not be tolerated and Representatives must report to work free from the effects of illegal drugs or alcohol and in proper condition to perform their duties.

Representatives are prohibited from using alcohol, or having open containers of alcohol, when operating ChildFund vehicles, or any other vehicle, while on ChildFund business.

While in the workplace or conducting ChildFund business outside the workplace, it is strictly forbidden to use alcohol in violation of applicable law or to use, sale or purchase illegal drugs.

Do Not Tolerate Threats and Physical Violence

Representatives expect and deserve a work environment free from intimidation, threats, or violent acts by others and ChildFund will not tolerate such statements or actions by or toward our Representatives. Statements or actions that threaten acts of violence, or the presence of weapons, firearms, ammunition, explosives or incendiary devices in the workplace, on work premises or in work vehicles, will result in immediate disciplinary action, removal from the physical premises and possible law enforcement involvement.

WE DEMONSTRATE FINANCIAL AND BUSINESS INTEGRITY!

Deal Fairly with All Parties

No Representative should ever make dishonest representations or statements to anyone or take unfair advantage of them through manipulation, concealment, abuse of privileged information, misrepresentation of facts, or any other unfair-dealing practice. ChildFund's reputation should be one of honesty, integrity and fairness in conducting its business. Representatives must deal honestly and fairly with third parties and must not:

1. Make false or misleading statements to donors, suppliers or enrolled children and families that participate in ChildFund's programs.
2. Otherwise take unfair advantage of donors, enrolled children and their families, suppliers or other third parties, through manipulation, concealment, and abuse of privileged information or any other unfair-dealing practice.
3. Offer a business courtesy to an outside party that could reasonably be interpreted as an attempt to gain an unfair business advantage or otherwise reflect negatively upon ChildFund. Staff may provide nominal non-monetary gifts (i.e., ChildFund logo apparel or similar promotional items) to donors or grantors providing they:
 - Do not violate any law or regulation or the Standards of Conduct of the recipient's organization;
 - Are infrequent in nature and are not lavish; and
 - Are properly reflected on the books and records of ChildFund.

Comply with Laws, Rules and Regulations

All Representatives are required and expected to comply with all governmental laws, rules and regulations that are applicable to them. In addition, no Representative shall make, or cause to be made, any improper payment or offer any improper inducement to any actual or potential donor, supplier or enrolled child or family or to an intermediary as a bribe, kickback or similar payment that is directly or indirectly for the benefit of any individual (including any government official), company or organization in any country, and that is designed, directly or indirectly, to secure favored treatment for ChildFund. ChildFund's policy, however, is broader in scope and is intended to apply regardless of whether the payment or use is lawful under the laws of a specific country.

Know the US Foreign Corrupt Practices Act ("FCPA")

The FCPA prohibits giving anything of value, directly or indirectly, to officials of foreign governments or foreign political candidates or political parties in order to obtain or retain business. It is strictly prohibited to make illegal payments to government officials of any country.

The US government has laws and regulations explaining the rules for business gratuities that may be accepted by US government personnel. However, if a gift, favor or other gratuity is promised, offered or delivered to an official or employee of the US government and does not specifically meet these rules it would not only violate ChildFund policy, but could also be a criminal offense. State and local governments, as

well as foreign governments, may have similar rules.

Avoid Conflicts of Interest

Representative must never have a relationship with or engage in activities that produce (a) an improper personal gain or advantage to the Representative, (b) an adverse effect on the interests of ChildFund, (c) an improper gain or advantage to a third party or (d) an appearance or perception of a conflict of interest. This includes participating in any business, outside activity or relationship that interferes with your ability to discharge your duty or responsibility to ChildFund fully, effectively, independently, and loyally.

While it is impossible to list every circumstance that may give rise to a conflict of interest, ChildFund's Conflict of Interest Policy provides some guidelines to help you in identify these situations. Some of the areas addressed include the following: transactions with family members, significant financial interests, outside relationships or transactions, corporate opportunities, political activities and outside work.

Conflict of Interest Policy (POL-FO-AS-051)

Conflict of Interest Procedure (PRO-FO-AA-89)

Fairly State Financial Reports

ChildFund requires honest and accurate recording and reporting of information in order to make responsible business decisions. ChildFund's accounting processes must use sound internal accounting controls to help ensure that transactions are properly authorized and accurately recorded, and that they conform to applicable legal, regulatory and accounting requirements in all material respects.

Ensure Proper Internal Controls

Strong internal controls and existing policies and guidelines are intended to detect, prevent, deter, and, where appropriate, disclose improper activities and misuses of those resources. By applying them over ChildFund's resources and activities, Representatives can cost-effectively reduce the risk of loss or misuse of funds or property to an endurable level.

When ChildFund's books, records, and systems are reviewed or audited, Representatives are expected to provide full cooperation and to truthfully respond to questions from government agencies, external auditors or internal auditors.

WE PROTECT CHILDFUND'S ASSETS AND RESOURCES!

Safeguard Confidential Information

Representatives shall maintain the confidentiality of all information entrusted to them by ChildFund or its business partners, except when disclosure is authorized by ChildFund or is legally required.

Representatives must safeguard child sensitive data at all times and ensure that no identifying information or images of children are shared in a way that exposes children

to the risk of harm. Confidential information also includes (1) the names, identities and any information of enrolled children and families, donors and sponsors, (2) business or marketing plans or projections, (3) internal financial and accounting data, (4) personnel information, (5) lists of business partners, (6) information discussed at Board meetings or meetings of Board committees, (7) project proposals and frameworks and (8) any other non-public information that, if disclosed, might be harmful to ChildFund or its business partners, as well as any information marked "Confidential," "Private," "For Internal Use Only," or with similar legends.

To avoid inadvertent disclosure of confidential information, Representatives shall not discuss confidential information with, or in the presence of any unauthorized persons, including family members and friends.

Avoid Improper Use of ChildFund's Assets

Representatives have access to numerous ChildFund assets and resources (e.g., monetary funds, equipment, vehicles, computers, electronics, and software) and should use them for legitimate business purposes only. You are personally responsible for protecting those assets entrusted to you and for helping to protect ChildFund's assets in general.

Money – Funds received by ChildFund must be handled with the utmost honesty and be disbursed according to the sponsor/donor's intentions and wishes. You must not misuse or allow misuse of ChildFund funds by spending monies on matters unrelated to our work or by wasteful or inefficient spending. All work-related expenses must be truthful, reasonable, and supported by appropriate documentation.

Physical Assets - The property and assets of ChildFund should only be used for business purposes. You are responsible for the professional use and reasonable care of the items such as computers, tablets and mobile phones which are assigned to you for your work.

Vehicles – ChildFund vehicles are only to be used for official business and cannot be used for personal trips unless approved by a Country Director or as part of an employment contract. Similarly, you cannot request that a colleague or subordinate use a ChildFund vehicle for your personal benefit.

Office Technology – ChildFund telephones (including mobile phones), computers, e-mail, Internet, and other technologies are intended for official business purposes and ChildFund has the right to monitor and review all information contained in these systems. As such, please be aware that there is no right of privacy when using ChildFund systems and equipment. You are permitted to use ChildFund technology, such as e-mail, phones and printers for limited personal purposes, providing your use does not infringe upon your work hours to any significant degree, does not violate policy and does not interfere with the operations or the values of ChildFund.

You are also prohibited from using ChildFund's IT resources to access, send, copy or forward any material that is harassing, offensive, sexually oriented, illegal or defamatory, e.g., no viewing pornography, no e-mailing inappropriate jokes.

Prevent Fraud

Any act of fraud or corruption in ChildFund activities depletes funds, assets and other resources necessary to fulfill our mission. Fraudulent and corrupt practices can also seriously damage ChildFund's reputation and diminish sponsor/donor's trust in our ability to deliver results in an accountable and transparent manner. Furthermore, it may affect staff and personnel effectiveness, motivation and morale, and impact ChildFund's ability to attract and retain a talented work force.

Fraud and corruption in any form is unacceptable. This is broadly applied and includes bid-rigging, bribery, corrupt practices, embezzlement, falsifying contracts, reports or records, forgery, kickbacks, making false statements, smuggling and theft. Actions taken to instigate, aid, abet, attempt, conspire or cooperate in a fraudulent or corrupt act also constitute fraud or corruption.

Fraud is an ever-present threat to our resources and preventing it must be your concern as well. You must report any suspected fraud that you encounter according to the procedures in the Reporting section of this Code.

Fraud Prevention and Awareness Policy (POL-FO-AS-055)

Fraud Prevention and Awareness Procedure (PRO-FO-AS-101)

WE REPORT OUR CONCERNS!

Whistleblower Policy (POL-FA-AS-054)

Whistleblower Procedure (PRO-FA-AS-100)

Report Violations

You have an obligation to report any suspected or actual concerns so they may be investigated. Representatives should first talk to Senior Management or a member of Assurance, GHR, the GC or the Chair of the Audit Committee. If you wish to remain anonymous, concerns may also be reported online at <http://speakup.childfund.org>, by calling the hotline number provided for your country on the website or via email to complaints@childfund.org.

Investigate Complaints

Complaints made through the website, the hotline or the complaints' mailbox will be directly received by Assurance and complaints received through any other means will be promptly reported to Assurance. All complaints will be considered for investigation and, if found to be accurate, acted upon in a timely manner. Assurance tracks all complaints and reports their resolution at periodic Audit Committee meetings.

Discipline Offenders

Violations may result in disciplinary action up to and including discharge. Certain matters may be referred to legal authorities for investigation and prosecution in addition to being handled through ChildFund's disciplinary process.

Prohibit Retaliation

Retaliation against any person who files a complaint in good faith is prohibited and retaliatory action should be reported immediately. ChildFund will take all appropriate steps, and comply with all applicable laws and regulations, to prevent retaliation against a Representative who submits a complaint where such retaliation is because such person has submitted the complaint.

Credible cases of retaliation will be investigated, and the results will be reported to Senior Management and the Chair of the Audit Committee.

Acts of retaliation constitute misconduct. Should an investigation establish that an individual engaged in such action, disciplinary action will be taken, up to and including discharge.