

# CODE OF BUSINESS ETHICS AND CONDUCT

April 2024

## Introduction

Ipas is an organization that emphasizes our mission and core values in both who we are and how we operate. Everyone in the Ipas Impact Network is a steward of Ipas's reputation and resources. This *Code of Business Ethics and Conduct* reflects our values, serving as a framework to support ethical behavior and decision-making. Its principles guide our treatment of one another and our interactions with donors, suppliers, partners, and other stakeholders.

This code identifies ethical principles that guide our work together, but it is up to each of us to uphold these principles. None of us know how to respond or react to every situation, so this Code also provides resources for asking questions, reporting concerns, and providing feedback. You are empowered and expected to do the right thing, and to ask for help when the right thing is not clear. Talk to your manager or director or write to [ethics@ipas.org](mailto:ethics@ipas.org) when questions arise. Report concerns—which can be done anonymously—to the Ethics Hotline at [ipas.ethicspoint.com](http://ipas.ethicspoint.com) or by dialing your country's phone number available on that site.

By acting together to uphold Ipas's core values in all that we do, we are strengthening our Network and in turn supporting our vision of a world where everyone has the right and ability to determine their own sexuality and reproductive health.

The Ipas Code of Business Ethics and Conduct has the following sections:

- Our vision
- Our mission
- Our values
- Our strategic priorities
- Our ethical principles
- Our responsibilities
- Our certification



## Our Vision

Ipas envisions a world where all people have the right and ability to determine their own sexuality and reproductive health.

## Our Mission

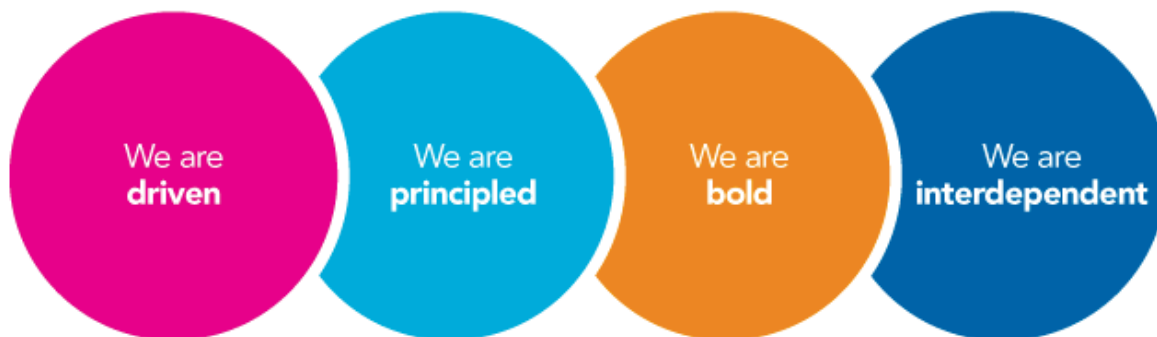
Ipas builds resilient abortion and contraceptive ecosystems using a comprehensive approach across sectors, institutions, and communities.

We center our work on the needs and perspectives of individuals who seek abortion care, and we strive to better center the needs and perspectives of all people who can become pregnant. Our approach addresses all the factors that impact a person's ability to access abortion.

We are working toward a **sustainable abortion ecosystem**, a dynamic condition in which resilient local stakeholders and systems are actively accountable and committed to abortion rights and responsive to everyone's abortion needs.

We know that to achieve this, we must work through **effective, equitable, and intersectional partnerships**, integrating abortion into the broader health, gender equality, and social justice movements.

## Our Values



### Driven

We are impatient for a world where all people's sexual and reproductive rights are fully realized and unsafe abortion no longer exists. We are focused and disciplined in our mission. We make the most of



our time, energy, and resources and push ourselves to keep moving forward despite obstacles. We do not let the perfect be the enemy of the good because people need abortion access today. We care deeply about the impact and quality of all that we do.

## **Principled**

We believe sexual and reproductive rights are basic human rights. Access to abortion is an integral and unassailable part of those rights. Abortion is also a fundamental part of basic health care. Our work to expand abortion access promotes gender equity. Our actions are founded on these core beliefs. We have integrity when we do not compromise these principles.

## **Bold**

We are unapologetic and unconditional in our commitment to every person's right to bodily autonomy. We solve problems through creative thinking and curiosity, and we challenge assumptions that might otherwise limit us. We make decisions based on experience and evidence and feel safe in taking calculated risks both in our communication and our actions. We always seek to challenge our own biases and assumptions and we are not afraid to create new pathways for people to exercise their right to abortion. We believe that this requires honest, direct communication and we are not afraid to tell the truth. We also are not afraid to laugh at ourselves and have moments of joy in our work.

## **Interdependent**

Our goals are ambitious and larger than us. We are devoted to advancing the global movement for abortion access and reproductive justice for all. We share information, expertise, and responsibility, and we strengthen our entire field as a result. We have a collaborative spirit and recognize when we are stronger together. We respect our colleagues, internal and external to Ipas, by giving each other the benefit of the doubt, and celebrating and supporting the work of others.

# Our Strategic Priorities

## **Make abortion legal.**

Law and policies must respect and protect abortion as a human right, without unnecessary or harmful barriers limiting access. Financing for sexual and reproductive health care, including abortion care, ensures resilient, affordable, and equitable access to abortion across the health sector. That is why we advocate around the world at local, national, and international levels.



**Put women and girls, and all people who can get pregnant, in control.**

Individuals must know where and how to access abortion and contraception, with information about options, including self-managed abortion with pills. They also must feel supported in their decisions and have the confidence to access services when they need them.

**Ensure abortion care is accessible, available, acceptable, and high quality.**

Abortion rights are recognized as part of the broader right to health. The pathways to abortion must be clear and accessible and must meet the total needs of anyone seeking that care. Abortion care should be universally accessible through a trained and supported health workforce, integrated throughout health-care systems, and free of stigma.

**Be innovative, effective, and always learning.**

We hold ourselves to a high standard for internal operations and governance to ensure we can be efficient and effective in implementing our programs and responding to the needs of those we serve

**Be a valued partner.**

We strive to always bring value to our partnerships and collaborations, as we depend upon our many global and local partners to help advance our urgent work of expanding access to—and strengthening a movement for—quality abortion and contraceptive care.

## Our Ethical Principles

*We embrace diversity and treat everyone with dignity and respect.*

We believe our differences strengthen Ipas and our impact across the globe, allowing employees to put their varied talents and diverse perspectives to use. Ipas strives to be inclusive and welcoming, and to ensure that employees and stakeholders are always treated with dignity and respect.

Ipas seeks to provide equal opportunity in all aspects of employment and maintain a work environment free from discrimination, harassment, sexual exploitation, and abuse. We uphold these policies worldwide, including in countries that have no legal prohibitions against these behaviors. Ipas follows our policies or local law—whichever goes further to protect marginalized or at-risk populations.



We respect human rights around the world and take immediate action to safeguard vulnerable people from exploitation and abuse. Ipas practices a zero-tolerance policy for sexual exploitation. We do not tolerate child or forced labor, nor human trafficking. Our commitment to fair treatment and human rights extends to our suppliers and partners. We insist that our partners treat their stakeholders in a manner consistent with these values.

Ipas's employee handbooks strictly prohibit all forms of discrimination and harassment, including sexual harassment. We hold employees accountable for creating a work environment that is professional and that protects employees, contractors, partners, and community members with whom we work from inappropriate behavior. We encourage reporting of concerns and protect parties from retaliation for doing so.

*We work toward a safe and healthy environment.*

Ipas is committed to the health and safety of our employees, the communities in which we work, and the environment. We acknowledge and act to mitigate the negative environmental impacts of our work. We follow safety laws and regulations, and do not tolerate threats or workplace violence. We ensure employees have a clean, safe, drug- and smoke-free workplace.

*We create a culture in which all employees take responsibility for ethical behavior.*

Ipas encourages employees to take ownership for ethical behavior. If an employee is aware of conduct that they believe is unethical or inappropriate, the employee has an obligation to speak up. Ipas protects employees who raise concerns in good faith from any type of retaliations. Concerns can be raised in various ways. See "Reporting Misconduct" section of this Code for further information.

*We compete honestly and fairly.*

Our funding environment is competitive. Whether dealing with donors, governments, suppliers, or partners our mandate is the same. We compete honestly and fairly. We represent our services and qualifications truthfully. We make purchasing decisions transparently in service of the best value. We create expectations we can meet and make promises we can keep. We compete fairly, even when others do not.



*We avoid conflicts of interest.*

Ipas respects and encourages employees' involvement in community activities unrelated to Ipas's work, when it is on the employee's own time and expense. There are times when a personal interest could conflict with Ipas's best interests but, as employees, we must focus on what is best for Ipas. When there may be the appearance of a conflict between our Ipas duties and outside interests, we promptly disclose and seek resolution.

Employees cannot have improper relationships with suppliers or other third parties and must be vigilant in ensuring that personal or family relationships do not pose a conflict or even the appearance of a conflict of interest.

Employees also cannot accept favors, gifts, or other gratuities from suppliers, partners, or beneficiaries in exchange for favorable treatment.

*Our reporting is clear and understandable, and our records are accurate.*

Ipas is committed to transparency in our reports. We report clearly and truthfully even when the data does not tell the story we hoped it would.

Ipas uses funds only for purposes that are properly justified and can be independently verified. We maintain financial controls and processes to ensure the accuracy of our financial reporting. We do not tolerate fraud or false or misleading entries or statements in our financial, technical, research, or programmatic reports or in any other records, and we do not pressure others to commit fraud.

*We protect information and assets.*

Ipas provides employees with the tools and information to be successful. We treat these valuable assets responsibly and use them only for Ipas business purposes. From the Ipas computers, email, office furniture and vehicles, to sensitive organizational, employee or partner data, we protect these assets. We respect Ipas's and our partners' intellectual property and proprietary information.

We obtain an owner's written permission before disclosing proprietary information, patented, or copyrighted assets. We use written or visual material only with proper attribution or permission.



We also ensure that Ipas documents are properly maintained and disposed of in accordance with organizational policy.

## Our Responsibilities

At Ipas, we have always been committed to the highest standards of ethical conduct in everything we do and everywhere we work. The Code of Business Ethics and Conduct is not just another policy or set of requirements: It summarizes the principles for which we must hold ourselves accountable.

We aim to act ethically and meet the high expectations we have of ourselves. Therefore, Ipas will provide its employees with the tools needed to make ethical decisions. These tools include policies, training, and general guidance.

Below is a RACI chart that outlines how all employees are **Responsible**, **Accountable**, **Consulted**, and **Informed**. This chart is an overview to help each of us understand how we contribute to Ipas being an ethical organization. It is a good place to start, but it is not a substitute for the actions identified within specific policies and procedures.

<p><b>Responsible</b></p>	<ul style="list-style-type: none"> <li>• Employees are <b>responsible</b> for reading, comprehending, and following Ipas’s Code of Business Ethics and Conduct and Ipas policies and procedures. Employees also are <b>responsible</b> for complying with donor requirements and other rules that apply to our work at Ipas. Failing to comply can be cause for disciplinary action, up to and including termination. Not knowing about a policy or other requirement is not an acceptable excuse.</li> <li>• Managers and leaders are <b>responsible</b> for living into a culture of ethics and compliance, demonstrating their commitment to the Code of Business Ethics and Conduct.</li> <li>• Implementing nodes and service nodes are <b>responsible</b> for providing training and guidance on the policies and activities that they own or manage.</li> </ul>
<p><b>Accountable</b></p>	<ul style="list-style-type: none"> <li>• All employees are <b>accountable</b> for their actions.</li> <li>• Managers and directors are <b>accountable</b> for their employees’ compliance with Ipas policies and procedures, including the Code of Business Ethics and Conduct.</li> </ul>



<p><b>Consult</b></p>	<ul style="list-style-type: none"> <li>• Employees are to <b>consult</b> their manager, the owner of the relevant policy/procedure, or anyone who may be able to assist whenever they have questions.</li> <li>• If it is unclear who to ask for guidance, <b>consult</b> your HR unit or the Network Risk Management service node.</li> </ul>
<p><b>Inform</b></p>	<ul style="list-style-type: none"> <li>• Employees are to <b>inform</b> someone whenever they become aware of suspected misconduct. Ipas has several mechanisms for reporting, as well as protection against retaliation (see “Reporting Misconduct” below).</li> </ul>

***Making the Best Decision***

Ipas has many policies and procedures, and yet it cannot be expected that every potential situation in which employees may find themselves is addressed in detail. In those cases, there are two principles to apply:

- Making ethical choices, and
- Asking for help.

***Making ethical choices***

For Ipas employees, an ethical choice expresses Ipas’s values. It is the right thing to do to achieve our vision of a world where all people have the right and ability to determine their own sexuality and reproductive health. If you find yourself in a situation where you are unsure of how to respond, ask yourself these questions:

- Are there policies and rules which apply to this situation? Do I know them? If so, would my action align with those guidelines? If not, do I know who to reach out to for help?
- Could my decision and conduct harm anyone? How could I act in a way to avoid harm to others?
- How would it impact Ipas and its vision if my decision and behavior were made public in a newspaper or on social media? Would I be willing to stand up for the decision I made?
- Would my decision be seen as reasonable and appropriate by other individuals? By Ipas stakeholders?





## Asking for help

Ipas has multiple resources embedded in our systems and structures to help individuals make the ethical choice. **You are not alone.** When you are not sure of what to do, there are always people available to help.

- Management: Your direct supervisor, their supervisor, project manager, Country Director, service node lead, a member of NetCARE, Staff Community Council or the Network Leadership Group – all are people available for you to contact when you need assistance.
- Human Resources: A member of your HR team is ideally positioned to assist with workplace and employment-related questions.
- Finance: Your finance team/manager can be helpful with questions related to Ipas financial policies and procedures.
- Grants, Contracts, and Procurement: In addition to local teams, members of the Contracts, Grants, and Procurement Team within the Ipas Consolidating Node are available to listen and give guidance on questions surrounding these issues.
- Policy owners: Every policy and procedure listed on the Ipas Organizational Policies and Procedures site has an assigned owner who is best placed to answer questions about specific documents.
- Network Risk Management: This service node is entrusted with oversight of the Ipas Code of Business Ethics and Conduct and the EthicsPoint hotline and is ideally placed to help when you are unsure of what to do when presented with an ethical choice.

## Reporting Misconduct

To be an ethical organization, Ipas entrusts our staff with the ability to say something when there is suspected or actual misconduct. All such reports are handled confidentially. You can make a report to any of the following:

- Management – your supervisor, your director, the project manager/director
- Human Resources – any member of your local Human Resources team
- EthicsPoint – the hotline (online or telephone access) is available at <https://ipas.ethicspoint.com>



Additional reporting options, such as an internal committee for sexual harassment complaints, may be available in your country node and/or as required by country law. Your supervisor and country management will be able to assist you.

While all reports are handled confidentially, there still may be a desire for anonymity. In those instances, the EthicsPoint hotline can be used to file an anonymous report. This mechanism is available to anyone – staff, partners, community members, etc.

### *What is required of me?*

- Know and understand Ipas policies and standards, donor requirements, and the local laws and regulations that apply to your role.
- Report and encourage reporting of suspected violations, including by Ipas’s third-party partners.
- Cooperate fully with internal and external investigations or audits.
- Protect the confidentiality of investigations.
- Complete the Ethics certification when required.

## Our Certification

As part of the Ipas onboarding process, and then annually thereafter, all Ipas employees are to certify that they:

- Have read, understand, and are in compliance with the Code of Business Ethics and Conduct;
- Have reported any instances of their own conflicts of interest;
- Are in compliance with all laws, policies, donor requirements, and other rules applicable to their work; and,
- Have reported any instances of actual or suspected misconduct of which they are aware.

Your signature on the certification means that you understand and are in compliance. If you are uncertain about anything, ask for help! (see above in the “Our Responsibilities: Making the Best Decision” section).

## Our Policies and Procedures

In addition to the Ipas Code of Business Ethics and Conduct, Ipas has several policies and procedures in place to guide our team and our activities. These include, but are not limited to:



Ipas Employee Handbook	Conflict of Interest & Disclosure Policy
Anti-trafficking and Anti-slavery Policy	Safeguarding Policy
Ethics Hotline Policy	Hotline Reporting & Investigations Procedure
Procurement Policy	Anti-fraud & Restricted Parties' Financing Policy
Donor Allegation Disclosure Policy	Time Reporting Policy
IT Acceptable Use Policy	Photography & Image Use Policy
Ipas Finance Manual	Code of Conduct for Ethical Storytelling

Employees can find all Ipas organizational policies and procedures on the internal Organizational Policies and Procedures Center site. For more information, please email [ethics@ipas.org](mailto:ethics@ipas.org).



