The Creative Way™

Creative Associates International

CODE OF ETHICS & BUSINESS CONDUCT

CREATIVE

“

If you want to go fast,

go alone;

If you want to go far,

go together.

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About Creative Associates International

Our experts focus on building inclusive educational systems, transitioning communities from conflict to peace, advancing sustainable economic growth, engaging youth, promoting transparent elections and more. Since our founding in 1977 by four enterprising women, Creative has been a mission-driven organization, undertaking projects in more than 115 countries. Today, we count on 1,000 professionals around the world who are committed to working alongside communities, institutions, the private sector and nongovernmental organizations to help people realize the positive change they seek.

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Our Mission

To support people around the world to realize the positive change they seek.

Our Values

- Respect for One Another
- Forthright, Clear and Direct Communication
- Teamwork
- Client Focus
- Technical Excellence

Our Vision

Creative envisions stable neighborhoods, communities and regions that can develop effective institutions to provide for their people, enabling them to overcome hardship and live peaceful and fulfilling lives.

Message from President & CEO

Leland Kruvant

The fundamental cornerstones of our company are found in our mission, vision and values, which have defined who we are since our inception over 40 years ago. They help shape our decisions, provide a road map for how we interact with each other and highlight what we consider to be most important. Simply stated, they are the lens through which we view the world and our unique position as a company to make it better.

Creative works to ensure that all employees, regardless of geography and culture, have the tools and resources they need to maintain the highest standards of ethical compliance. The Creative Way – Creative Associates International Code of Ethics and Business Conduct serves as a guide for employees regarding the right questions to ask, the right experts to consult and the right way to make ethical business decisions. The Code contains useful information that all of us as employees should know and follow.

Since our first project, we have collectively built upon our reputation with clients, governments, communities and beneficiaries in the development community as a trusted partner. That is the result of a lot of hard work, vigilance and dedication by all our colleagues. Trust is one of our most valuable assets, but it is also one of the most fragile. Through one news story or event, one incident, one bad decision or one careless comment, the trust we have worked so hard to earn can be lost.

That is why the way we conduct our business is as important as the services we provide. In other words, how we do our work is as important as what we do. Our Code provides us with the information and resources we need to operate our business in a responsible manner, to make values-based ethical decisions and to maintain trust.

Creative's Code of Ethics and Business Conduct reflects our continuing and absolute determination to do the right thing in everything we do. Read our Code and use it to guide your everyday actions. Speak up if you have a question or concern, and seek guidance any time you are unsure about how to do the right thing.

Leland

Leland Kruvant
President & CEO
Creative Associates International

Introduction: Doing What is Right *The Creative Way*

The Beginning: Four Women, One Vision

In 1977, in the basement of a townhome in Washington, DC, four women with diverse cultural backgrounds and a single passion for educational excellence and opportunity founded the enterprise that would become Creative Associates International. Charito Kruvant was a pioneer in bilingual education who had worked with Head Start in minority neighborhoods in New Jersey. Mimi Tse, originally trained as a chemist, was fascinated by child psychology and the development of the young mind. Diane Dodge was an early childhood specialist, and Cheryl Jones was an accomplished education practitioner.

The four collaborated on an early childhood development project that focused on education and human development programs in the US. Eventually, their domestic focus extended to promoting international educational development and supporting communities in transition. Their entrepreneurial spirit helped build Creative's reputation for innovation, initiative and flexibility. Today, a diverse group of experienced professionals lead Creative.

We have undertaken projects in more than 85 countries and have active programs in more than 30 countries. The company's portfolio has grown considerably and now includes education, economic growth, stabilizing communities, enhancing good governance, promoting transparent elections and more – all toward the goal of improving the lives of millions of people around world.

The core values that motivated the company all those years ago still permeate everything Creative does: Respect for One Another; Forthright, Clear and Direct Communication; Teamwork; Client Focus; and Technical Excellence. Our values are foundational and constitute the fabric of the company. They guide the way we work with our business partners, within our communities and with each other. Through integrity, accountability, passion, humility, simplicity and a focus on success, we have created a vibrant, ethical performance culture. It is how we do what is right, the Creative way, in making the world a better place.

The Code of Ethics and Business Conduct contains a lot of important information as well as resources that help us conduct our business legally, ethically, responsibly and in accordance with our values. It is readable, easy to use and relevant to our day-to-day tasks. Familiarize yourself with the Code and use it often. The topics are organized under four major headings and represent our key stakeholders – those groups of people who have a stake in or are otherwise affected by how we run our business.

Nagivating the Code

Topics are grouped into **four categories:**

- Our People
- Our Marketplace
- Our Customers and Clients
- Our Communities

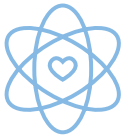
Each topic in the Code is broken into **three sections**:

Doing What's Right

Creative's approach to conducting business, setting the expectation for how we conduct ourselves.

What This Means

How we behave in order to meet or exceed our expectations and those that others have of us.



Why This Matters

The importance in following the relevant standard to protect Creative's reputation, avoid unwanted risk and contribute to the company's long-term sustainability.

Around the Globe and in Our Own Backyard

Our reputation and success depend upon the decisions and actions of our people all over the world. We are committed to ensuring that every action we take honors Creative's values and is in full compliance with the law and our Code.

Everyone's Responsibility

As employees, we have a shared responsibility – individually and collectively – for how Creative conducts business and the impact we have in the world. Our Code reflects who we are and what's important to us. It provides an overview of the laws, regulations and company policies that apply to us and the work we do, but it does more than that – it builds upon our shared values.

That's why we count on every employee to follow our Code and make decisions that will preserve the trust that others have placed in us. We expect the same from our business partners, consultants, subcontractors and anyone else who acts on behalf of the company.

Additional Responsibilities for Leaders/Managers

While all Creative employees are required to act with integrity, show respect and build one another's trust, leaders and managers have special responsibilities under our Code. If you lead or supervise others, Creative requires you to demonstrate ethical leadership and set the right tone by:

- Fostering a positive work environment where only legal, ethical and appropriate behaviors are acceptable
- Leading by example and modeling appropriate behaviors that are consistent with Creative's values
- Regularly communicating the importance of ethically sound business practices and discussing the ethical and legal implications of business decisions
- Creating a supportive environment where employees feel comfortable with raising questions and concerns, and responding to these questions and concerns appropriately and timely
- Providing adequate training and development resources to enable employees to perform their duties appropriately and grow their careers
- Identifying and mitigating business risks concerning ethics, compliance and other operations
- Using our performance review process to evaluate employees on what business objectives they achieve and how they achieve them

Making Ethical Decisions the Creative Way

Every business decision has an ethical component to it. It is important to consider all stakeholders and make decisions consistent with Creative's mission, vision and values. Use the decision-making model below as a guide.

Responsibilities of Suppliers and Other Business Partners

We believe in doing business with business partners who share our values and approach to doing business. We expect these business partners to review, understand and act consistently with the standards set out in Creative's Global Supplier Code of Conduct.

Upholding the Code

Seeking Guidance and Speaking Up

At Creative, we strive to maintain a culture where our questions and concerns are acknowledged and considered. This gives us the freedom to be at our best, extend trust, demonstrate ethical leadership and pursue our Mission and Vision. If you have any question or concern about the Code, there are numerous resources available to you.

Speak Up!

Reporting a Question or Concern

All Creative employees are encouraged and advised to use the many channels available to report a question or concern:

1

Talk to your:
Manager/Supervisor/Program Lead

2

Call toll-free:
1-888-992-0326

3

Send an email to:
Hotline@CreativeDC.com

Ethics & Compliance Department

The Ethics and Compliance Department is a resource to:

- Provide guidance for and clarify how to apply this Code or a company policy to our business activities
- Provide ethics and compliance advice, counsel, awareness and training
- Shape the culture of the company and mitigate ethical risk

Zero Tolerance for Retaliation

As a company, we know it takes courage to come forward and share your concerns. We support honest and open communication and encourage our employees to ask questions and report concerns. We will not retaliate against any individual who, in good faith, discloses any actual or suspected violations or participates in a Creative ethics investigation. Retaliation will result in disciplinary action up to and including termination of employment.

Disciplinary/Corrective Action

All employees are required to comply with this Code, and this compliance is a condition of employment. Failure to comply with the Code, company policies and applicable laws can result in disciplinary or corrective action, up to and including termination of employment.

Waivers to the Code

In rare circumstances, we recognize that a strict application of the Code may result in a significant hardship or risk. In these exceptional cases, a waiver of the Code may be sought for the purpose of mitigating hardship. Any waiver of this Code must be approved by the Legal Department.

The Reporting and Investigation Process

As part of Creative's values-based culture, it is important for employees to have the ability to raise questions and concerns, without fear of retribution, and have the confidence in knowing their concerns are taken seriously and, when warranted, investigated fully.

Reporting Allegations

- It is Creative's policy that allegations be reported utilizing the company's reporting channels:
  Talk to your Manager/Supervisor /Program Lead; **Call** toll-free: +1 (888) 992-0326.
  Send an email to Hotline@CreativeDC.com
- The Security Department, with assistance from other functional organizations, administers the receipt, review, investigation and proper disposition of all allegations
- All Creative staff are expected to abide by the guidance from, and to support the efforts of the Security Department while handling allegations
- Projects and divisions do not have the authority to independently investigate allegations, they must do so at the direction of the Security Department or the Legal Department for privileged investigations
- When reporting an allegation, it is important to be as specific as possible and provide details about the allegation

Investigation Process and Protocol

- When an allegation is received the Security Department will review the allegation and determine whether there are any conflicts of interest involving anyone reviewing the allegations
- As needed, Security will involve Legal, HR and Program staff to assist in investigating the allegation to determine credibility and accuracy, while still protecting the anonymity of the accuser
- We investigate reports of actual or suspected Code violations promptly, fairly and in accordance with our legal obligations
- All employees are required to cooperate fully in any investigation and are asked to keep their knowledge of, and participation in, such investigation confidential to help safeguard the integrity of the reporting source
- When conducting investigations, we seek fair, well-reasoned outcomes that balance our interests in identifying and addressing misconduct while preserving the dignity of those involved

Confidentiality and Retaliation

- The Security Department will ensure the identity of a person submitting allegations is treated confidentially to the greatest extent possible
- It is not acceptable to make malicious, false claims against anyone for any reason
- Creative does not tolerate any forms of retaliation or victimization against individuals reporting allegations

Government Investigations and Reporting

- Though an unlikely event, we must know how to respond appropriately to a government or regulatory agency request for information, investigation or when reporting allegations
- In such circumstances, we must cooperate lawfully and any information we provide must be truthful and accurate
- To ensure that we act appropriately while protecting the company's interest, it is important to refer the inquiry to the Security and Legal Department

Employee Behavior Expectations

At Creative, we are a people company. Built upon relationships and a strong commitment to values, we support people around the world to realize the positive change they seek. In this mission, high ethical standards and outstanding performance go hand in hand – ***How we do*** something is equally important as ***What we do***. To that end, these are our expectations for employees at Creative:

1 Do the right thing – ***Always***

2 Hold one another accountable for living the Creative values and abiding by these behavior expectations

3 Treat one another with respect and fairness

4 Value diversity of thought, experiences and opinions

5 Actively listen and communicate with openness, honesty, respect and clarity

6 Address conflicts thoughtfully and constructively without personal attacks or anger

7 Foster an environment of inclusion, trust and empowerment

8 Collaborate with one another as business partners

9 Recognize others' contributions

10 Commit to the success of our teams and challenge ourselves to the highest levels of performance

The Creative Way *for...*

Our People

Creative's vision of supporting people and creating positive change around the world begins with fostering a workplace where people are truly valued. All employees are entitled to be treated with fairness and respect, and we invite conversation to create the best possible outcome for everyone involved. Together, we can unlock an even brighter future for our company, ourselves and the global citizens we serve.

1 Valuing Diversity and Inclusion

Doing What's Right

We believe in the power of people and respect individuals of all backgrounds, capabilities and opinions. We value one another's contributions and believe that everyone should have an equal chance to succeed. We encourage an inclusive environment that promotes individual expression, creativity, innovation and achievement.

What This Means

We treat one another with dignity and respect and foster an atmosphere of open and candid communication:

- We hire, retain and promote based on qualifications, demonstrated skills, achievements and other merits
- We do not discriminate
- We expect our business partners, consultants and subcontractors to act in a way that is consistent with our fair treatment and equal opportunity standards
- We comply with all the applicable labor and employment laws

Why This Matters

We believe that diversity – of people and ideas – inspires innovation and enhances our competitive advantage in the global marketplace. We are committed to treating employees and applicants for employment fairly and seek to develop and retain a diverse workforce. We value individuals of diverse backgrounds, experiences, approaches and ideas and promote this view with those with whom we do business.

> *"We believe that diversity – of people and ideas – inspires innovation and enhances our competitive advantage in the global marketplace."*

What Would You Do?

SCENARIO:

Aisha is a Pakistani Muslim who recently joined the company and is working with other USAID implementers in a shared office space in support of a Creative project. She wears a headscarf, covering her head and neck, in accordance with her religious beliefs. The lead implementer introduced a new dress code, which prompted her manager to tell her that she could not wear her headscarf at work because of health and safety concerns. Aisha refused to do so. She was suspended and then later dismissed.

How could this situation have been handled differently?

ANSWER:

If the new policy did not consider religious beliefs and corresponding dress codes, then it should be rewritten to be more inclusive. Aisha should never have been put in a position to choose between her religious beliefs and her job.

2 Preventing Harassment & Discrimination

Doing What's Right

We are committed to maintaining a work environment in which our people are treated with dignity and respect and which is free of harassment and discrimination.

What This Means

- We conduct ourselves appropriately in all dealings with others
- We do not tolerate any form of abuse or harassment of colleagues, business partners or anyone else with whom we have business dealings
- We have zero tolerance for unwanted verbal or physical conduct or degrading and disparaging jokes related to race, color, age, gender, sexual orientation and other categories protected by the laws that apply to us
- We are conscientious about how our actions and comments might be perceived or misunderstood by others
- We report instances of harassment or discrimination

Why This Matters

We believe that every employee should be treated with respect, regardless of their race, color, ethnicity, national origin, religion, age, disability, medical condition, veteran status, marital status, gender, sexual orientation, gender identity or gender expression. A work environment free of harassment and discrimination enables us to grow and thrive together.

What Would You Do?

SCENARIO:

Kumar supports an education program in Central America staffed by a multicultural team of US expats and local country nationals. Two members of the team who are managers have openly disparaged the religious practices of others, often in an open forum for all to see and hear.

What is the best way to address this situation?

ANSWER:

This kind of behavior is clearly harassment and should not be tolerated. HR should be advised and take an active role in addressing this matter to ensure it does not happen again. The leaders in question should be held to the same standard as all employees, and this situation warrants corrective action and discipline. Every employee is entitled to be treated with dignity and respect.

3 Promoting a Safe & Healthy Workplace

Doing What's Right

We are committed to maintaining a safe and healthy workplace for our colleagues, business partners and visitors, as well as people in the communities and countries in which we operate.

What This Means

We foster an active health & safety culture by:

- Always adhering to local or country law
- Making responsible choices and not engaging in or requesting unnecessary or unsafe acts on the job
- Knowing and complying with applicable occupational health and safety laws and related company policies
- Watching out for one another and helping others avoid unsafe conditions or behaviors
- Promptly reporting any unhealthy or unsafe conditions or behaviors, especially workplace hazards, broken or missing equipment, injuries or threatening or violent behavior
- Knowing what to do in an emergency and cooperating during emergency drills; and
- Never bringing illegal drugs or other controlled substances onto company property or being under their influence while at work

Why This Matters

We all share the responsibility of making health and safety a daily priority. Each of us is accountable for observing the health and safety rules and practices that apply to our job and for taking precautions necessary to protect ourselves, our colleagues and our visitors. Our health and safety demands that each of us report to work free of any substance, including alcohol and drugs, that could prevent us from doing our jobs properly or that could create a dangerous situation.

What Would You Do?

SCENARIO:

While travelling in a USAID vehicle between sites in rural Honduras, Constance noticed what appeared to be some sort of leak coming from the bottom of the car. The odor of gas was prevalent, but she did not say anything because she did not know what was causing the problem.

What could she have done differently?

ANSWER:

Constance should have voiced her concerns, as there might have been a safety hazard that could have seriously hurt many people. Better to be safe than sorry.

4 Protecting Personal Information

Doing What's Right

We protect the privacy and confidentiality of our colleagues, partners and clients. Personal, medical, family and financial information is not disclosed to anyone, internally or externally, except when there is a business need for such information and we are legally permitted or required to disclose it.

What This Means

We help protect the personal information of our colleagues, partners and clients in the following ways:

- Follow all applicable privacy laws and company privacy policies
- Collect, use and process personal data only for legitimate business purposes
- Protect the privacy and security of information entrusted to us
- Never share personal information with anyone, either inside or outside Creative, who does not have a business need to know it

Why This Matters

In order to conduct our business, comply with legal requirements and administer benefits, it is necessary for Creative to collect, store, use and share colleagues' personal information. All information relating to employment candidates and the employment or employment history of any current or former colleagues is confidential, and we use that information only for relevant and appropriate business purposes.

> *"With every choice we make at Creative, it is important to make business decisions based on sound judgement consistent with our long-standing values."*

What Would You Do?

SCENARIO:

Ali is an HR professional supporting several projects in South America. As part of his job responsibilities, he is privy to a wide range of employee personal information, and he takes information privacy very seriously. Recently, a coworker was assisting him on a project and using some of this data. Shortly after, several employees complained that they were receiving solicitations and phone calls for products and services outside the company.

Could there be a connection here, and what should Ali do?

ANSWER:

Although this could be just a coincidence, it warrants further inquiry. Ali should raise the concern through Creative's reporting mechanisms, as there might have been a data breach. The matter can then be appropriately investigated and adjudicated accordingly.

5 Using Social Media Responsibly

Doing What's Right

We have shared identity as Creative employees, but we are also individuals with our own thoughts, opinions and interests.

What This Means

We should engage with social media responsibly, in accordance with the following rules:

- Comply with our social media policy
- Distinguish clearly between authorized business communications and personal communications on social media
- Adhere to Creative's values in all authorized business communications on social media
- Ensure that our time and effort spent on social media do not interfere with our work commitments
- Never disclose our confidential, proprietary or privileged information on social media
- Only authorized personnel can speak on behalf of the company on social media
- Refrain from posting information that may be considered contrary to Creative's values, discriminatory, harassing, or obscene, because we are responsible for what we post online

Why This Matters

What we say, email, blog, post or tweet can reach millions of people in seconds. Everything we say and do affects our reputation, and this power brings additional responsibility. Even as we find new ways to communicate with others, we recognize the growing importance of social media and believe it can be a great vehicle for communicating our passion and knowledge. Outside of work, many of us blog, contribute to message boards and post on social media networks. In these personal pursuits, we all have a responsibility not to disclose company confidential and proprietary information without authorization.

What Would You Do?

SCENARIO:

Misha recently received her master's degree in international relations and was excited to join Creative as a new associate in the Communities in Transition division. Shortly after starting, she had the opportunity to attend a company-sponsored event, where she met some of her new colleagues and made additional contacts within the development community. At this event, she took many photos and videos and posted them to social media later that evening to share with friends.

Does Misha's posting violate Creative's social media policy?

ANSWER:

Possibly. Although there was no intent on her part, Misha might have overstepped the line between personal communication and what could be construed as business communication. Only authorized personnel can officially speak or communicate on behalf of the company on social media.

6 Avoiding Conflicts of Interest

Doing What's Right

At Creative, we thrive together. We make decisions and act in the best interests of Creative rather than for personal gain.

What This Means

With every choice we make at Creative, it is important to make business decisions based on sound judgment consistent with our long-standing values.

Why This Matters

Conflicts of interest can be avoided or addressed if promptly disclosed and properly managed. If you are in a situation where there may be a real or perceived conflict of interest, you must:

- Comply with our conflict of interest policy
- Disclose your situation to your manager, Legal Department or Ethics & Compliance Department
- Remove yourself from the decision-making process for how to resolve the situation
- Support the subsequent decision

What Would You Do?

SCENARIO:

As a recruiter supporting new business pursuits, Ariana is always under pressure to hire top talent. During a recent proposal crunch, she recommended her brother-in-law for a key position, although she had no say in the final selection.

Does this present a problem or conflict of interest?

ANSWER:

Yes, this certainly could be perceived as a conflict because of the personal relationship with her brother-in-law. Although he may be a viable candidate, Ariana's recommendation of his candidacy could also be at the exclusion of someone more qualified. This conflict should be disclosed prior to the recommendation.

A Business Courtesies, Gifts & Entertainment

When we compete in the global marketplace, we do so on the basis of the quality and price of our services. We do not seek to gain any advantage or influence through the use of business courtesies, gifts or entertainment offers. Any gift that creates a sense of obligation or compromises your professional judgment is always inappropriate. Always avoid business courtesies, gifts or entertainment that could raise questions about conflicts of interest for you or Creative, or damage our reputation if they became known publicly.

Generally, we do not offer or accept business courtesies, gifts or entertainment to or from companies or individuals currently conducting or seeking to conduct business with Creative.

Gifts or entertainment given or received should:

- Be nominal in value
- Not be requested or solicited
- Be infrequent
- Satisfy a reasonable business purpose
- Not cash or cash equivalents
- Be recorded accurately
- Be permitted by law and the policies of both the giver and receiver

Gifts or entertainment should never be given to a government official without receiving approval in advance from the Legal Department.

What Would You Do?

SCENARIO:

Artie works in Procurement at Creative's HQ. He often deals with multiple vendors, many of whom have a long-standing relationship with the company. From time to time he is offered small tokens of appreciation, such as lunches and gift cards, and he always politely turns them down. Recently, he was offered the opportunity see his favorite band with third-row seats. He was willing to pay the vendor for the seats.

Would this be permissible?

ANSWER:

No, just because Artie is willing to pay for the seats does not make it permissible. A favor of this value could create a sense of obligation to provide the vendor with more business, which would create a bad precedent.

“At Creative, we encourage our employees to lead full and productive lives outside of work.”

B Outside Employment & Related Activities

We each give our best effort every day at Creative, not allowing outside jobs or other activities to hinder our contributions to Creative.

At Creative, we encourage our employees to lead full and productive lives outside of work. Outside activities – such as your own business, a second job, board service and community work – are acceptable as long as these activities do not:

- Interfere with your job responsibilities or ongoing performance
- Involve working for a competitor or supplier
- Risk damaging the company's business or reputation
- Violate local country law or applicable employment agreement, which may restrict other employment
- Use company resources or create any other kind of conflict of interest

What Would You Do?

SCENARIO:

Jasmilla leads a highly productive team that supports community-led initiatives in Africa. With a long track record of similar successes, she is highly sought after for her subject matter expertise. This often leads to networking opportunities with professional colleagues looking to learn and share best practices. Sometimes there is an offer presented for her to consult with these companies and be compensated accordingly.

Does this present a problem or conflict of interest?

ANSWER:

It could present a conflict if the company or organization making the offer is a direct competitor or if it interferes with Jasmilla's current job responsibilities. Even if those conditions do not apply, it is always a good idea to consult the Legal Department or Ethics & Compliance. Remember, it is important to avoid even the perception of a conflict.

The Creative Way *for...*

Our Customers and Clients

The African proverb "If you want to go fast, go alone; if you want to go far, go together" speaks to one of Creative's core beliefs that partnerships produce better long-term results for communities. With a strong focus on our customers and clients, Creative partners with civil society organizations, multilateral donors, national governments, the private sector and others to improve education, stabilize neighborhoods and enhance community resiliency. Partnerships are one of the keys to Creative's success.

1 Creating and Maintaining Accurate Records and Accounts

Doing What's Right

We maintain complete and accurate records so that we can make responsible business decisions and provide truthful and timely information to our customers.

What This Means

All of us, not only those working in finance and accounting roles, have a responsibility to ensure the integrity, accuracy and effectiveness of our record-keeping in the following ways:

- Record your time accurately and timely
- Ensure that records and accounts conform to generally accepted accounting principles and our internal policies and controls
- Record all assets, liabilities, revenues, expenses and business transactions completely, accurately, in the proper period and in a timely manner
- Never set up or maintain for any purpose any cash funds, other assets or liabilities that are secret or unrecorded
- Never conceal or destroy documents or records in violation of company retention policies, subject to an investigation or part of a legal document hold.

Why This Matters

Business and financial records are essential to our business operations. We rely on the integrity and accuracy of those records, both for internal decision-making and for the benefit of our customers, government agencies and regulators.

What Would You Do?

SCENARIO:

Angela is a procurement specialist on a USAID project implemented by Creative in Laos. During the monthly review of field supporting documents, the HQ field accounting associate notices that while Angela signed her timesheet, it was not approved by her supervisor.

Is this a problem? If so, how could it have been avoided?

ANSWER:

Yes, in accordance with Creative's policy and US government regulations, supervisor approval is required on all timesheets. Creative is routinely audited, and an unapproved timesheet would certainly be questioned and likely disallowed by an auditor. This should have been rectified in the field prior to payroll processing, as only approved and signed timesheets should be considered for payment. The project's internal controls should be reviewed and strengthened to avoid this type of oversight.

2 Safeguarding the Company's Reputation and Other Assets

Doing What's Right

We protect Creative's reputation and other tangible and intangible assets so that we can better serve and preserve value for our customers and other stakeholders.

What This Means

We are good stewards of Creative's assets by taking the following actions:

- Safeguarding data from unauthorized access modification, duplication, destruction or disclosure, whether accidental or intentional
- Taking reasonable care to prevent loss, damage, destruction, theft, unauthorized or improper use, or waste of company assets
- Protecting, securing, retaining and destroying Creative's information in accordance with corporate or local company requirements
- Protecting company information, both non-public and publicly available information, for which Creative has intellectual property rights
- Using or authorizing the use of any Creative asset only for business purposes, regardless of condition or value

Why This Matters

Creative assets, and those of our customers and clients, are essential to the long-term success of the company. We all share the responsibility to be good stewards of those assets, taking care to avoid loss, damage, waste and improper use.

What Would You Do?

SCENARIO:

Benita and Donte work in Business Development as proposal managers. They recently attended an industry event that was also widely attended by other companies in the development community. During casual discussion at one of the event breaks, the topic turned to new business pursuits, with many peers sharing their perspectives on companies they were pursuing and their corresponding strategies. Benita and Donte felt uneasy about the conversation and did not contribute.

Were Benita and Donte's concerns founded?

ANSWER:

Yes, what might seem like a simple conversation could actually present a risk to the company if proprietary information or Creative's intellectual property were improperly shared. Benita and Donte were right to not share any potential company proprietary information and safeguard that data.

3 Responding to Inquiries from the US Government, Foreign Governments & the Media

Doing What's Right

At Creative, we speak with one voice when communicating with the media, external stakeholders, customers and the general public.

What This Means

If you receive an inquiry from outside the company and are not authorized to respond, you should:

- Be friendly and courteous
- Not speak or share information about Creative
- If contacted by a government investigator, refer the inquiry to the Security and Legal Department
- If contacted by the media, refer the inquiry to Corporate Communications

Why This Matters

Our customers, stakeholders and employees deserve accurate, clear, complete and consistent communications about Creative. To ensure that we comply with the law and protect our interests, only employees who are specifically trained and authorized to do so should represent Creative to the public or the media.

> *"As employees, we have a shared responsibility – individually and collectively – for how Creative conducts business and the impact we have in the world."*

What Would You Do?

SCENARIO:

Salem is a Deputy Chief of Party supporting a community, family and youth resilience project in the Eastern and Southern Caribbean. He was recently approached by an auditor from USAID, inquiring about some outstanding invoices. Recognizing the customer, he politely said that he could not provide the information requested right away but had to speak to his supervisor and other company representatives.

Was this the best way to address this situation?

ANSWER:

Salem did the right thing here. The auditor should have requested the information in writing or through official channels. He was courteous to the customer but did not divulge any information before getting further direction and permission. Only employees who are trained and authorized can speak on behalf of the company.

AKG

The Creative Way *for...*

Our Global Market

We compete in a global marketplace with integrity and purpose. Our customer-driven insights fuel our innovations and our quest to expand our global reach. By looking beyond the horizon, we can meet evolving needs in more ways and more places, embracing our truly global future. Creative provides outstanding, on-the-ground development services and forges partnerships to deliver sustainable solutions to global challenges. Our experts focus on building inclusive educational systems, transitioning communities from conflict to peace, developing sustainable economic growth, engaging youth, promoting transparent elections and more. Creative is recognized for its ability to quickly adapt and excel in conflict and post-conflict environments, delivering a high degree of service, innovative theories of change and solid project evaluation.

1 Conducting Business Globally

Doing What's Right

As a global company doing business around the world, Creative is committed to complying with applicable laws that govern competition and international trade.

What This Means

If you are involved in the sale, marketing, distribution or transportation of services, or the transfer of technology across international borders, you must:

- Be familiar with and comply with all applicable laws and company policies regarding international trade restrictions
- Avoid any anti-competitive behavior, such as price-fixing and bid-rigging, when interacting with other competitors
- Notify the Legal Department if you receive any requests from customers, suppliers or others to participate in a boycott against individuals, companies or countries
- Seek guidance from the Legal Department if you have a concern about a trade or export related issue

Why This Matters

Creative does business in multiple countries around the world and are subject to numerous anti-competitive and international trade laws. We must be registered to conduct business in these countries, and our work is governed by these laws. Penalties for violations can be severe, including fines, revocation of permits or even imprisonment.

What Would You Do?

SCENARIO:

Robert is a Business Development Director who is developing opportunities in emerging markets. He recently brought two consultants into the HQ facility in support of a new project startup. Neither of the consultants was a US citizen which would not be uncommon.

Are there any steps or precautions Robert should take to ensure that discussions with the two consultants are conducted properly?

ANSWER:

Yes, extra precautions must be taken to avoid the transfer any information, technology or other product without permission, depending on what is discussed. Consulting with non-US citizens in this context could be considered an export control violation and subject Creative to significant fines and penalties.

2 Preventing Bribery and Corruption

Doing What's Right

At Creative, we base our business relationships on trust, transparency and accountability. We never offer or accept any form of payment or incentive intended to improperly influence a business decision.

What This Means

We prevent bribery and corruption by:

- Never offering, promising or giving anything of value to a government official or anyone else in order to gain a business advantage
- Never offering or accepting bribes or kickbacks
- Recording all payments and receipts completely and accurately
- Never using an agent or other third party to make improper payments that we cannot make ourselves
- Avoiding facilitating or "grease" payments, which are generally prohibited even if they are legal under local laws
- Following Creative's policies related to anti-corruption, giving and receiving gifts and entertainment

Why This Matters

Corruption is the abuse of entrusted power for personal gain. A bribe occurs when someone gives or promises another person something of value to obtain favorable treatment. Kickbacks involve giving or receiving personal payments as a reward for the awarding of a contract or other favorable outcome or business transaction. Bribes and kickbacks of any kind are unethical, violate our Code and are illegal.

Governments are taking steps to combat corruption, and many of the countries in which we do business have specific, stringent laws against it. We do not tolerate corrupt practices in our business anywhere in the world.

What Would You Do?

SCENARIO:

Creative has won a new project in Central America. The start-up team and COP are experiencing problems with registration that are delaying project implementation, and USAID is becoming concerned with the delay. After a meeting with the government, a local official informs the Creative team that for a one-time fee he can expedite the registration, which will allow the project to get back on track and resolve USAID's concerns.

Can we make this payment?

ANSWER:

While this type of facilitation or "grease" payment is very common and even legal in many countries, it is considered a bribe and is in violation of both Creative and US government regulations, including the Foreign Corrupt Practices Act. Making this type of payment is a very serious infraction and could jeopardize Creative's ability to continue receiving federal contracts. No employee may agree to make such a payment for any project, and if approached to make one, the employee should report that to the Legal Department or the Creative reporting hotline.

3 Human Trafficking

Doing What's Right

At Creative our first value is Respect for One Another. In accordance with that value, we take a strong stand against human trafficking in any way, shape or form. Any information regarding human trafficking must be immediately reported to any one of the company's reporting channels.

What This Means

Human trafficking is a form of modern-day slavery in which traffickers use force, fraud, or coercion to control victims for the purpose of engaging in commercial sex acts or labor services against their will.

Why This Matters

Creative's approach to human trafficking has three main elements – prohibitions, prevention, and response if trafficking is found to have occurred.

Prohibition:

Creative strictly prohibits and has zero tolerance for the following actions associated with human trafficking:

- Engaging in any form of trafficking in persons
- Procuring commercial sex acts
- Using forced labor
- Destroying, concealing, confiscating or otherwise denying access by an employee to the employee's identity or immigration documents
- Using misleading or fraudulent practices during employee recruitment or offer of employment
- Using recruiters that do not comply with local labor law
- Charging employees recruitment fees
- Failing to provide return transportation upon the end of employment

Prevention:

Creative takes all necessary and appropriate actions to prevent human trafficking. We put in place policies and procedures and demonstrate the company's commitment to anti-trafficking by providing training programs, raising awareness, and promoting a culture of anti-trafficking among those hired or retained by Creative.

Response:

Creative's response to any reports or allegations of human trafficking includes a comprehensive investigation and any appropriate corrective action and reporting to relevant government authorities.

What Would You Do?

SCENARIO:

Bob is an expat posted on a project in El Salvador. He attends a project-funded staff appreciation dinner with a local sex worker as his guest, which makes the other staff very uncomfortable.

Do they have an obligation to report this to the home office?

ANSWER:

Yes, this is a significant problem with many compliance issues, especially because it involves a project-funded event. This should be reported immediately.

4 Child Protection & Sexual Exploitation

Doing What's Right

Given the global footprint of our work at Creative and the many projects directly working with and assisting children and other vulnerable individuals, everyone should feel safe and protected.

What This Means

Creative prohibits all personnel and consultants from engaging in child abuse, exploitation or neglect and is committed to the following:

- The welfare of children, young people and vulnerable adults is paramount
- They should be protected and their welfare safeguarded in activities in which Creative is involved – regardless of their age, culture, ability, gender, language, racial origin, religious belief and/or sexual identity
- Taking all reasonable steps to protect them from harm, discrimination and degrading treatment and to respect their rights, wishes and feelings
- All reasonable suspicions or allegations of poor treatment or abuse will be taken seriously and responded to swiftly and appropriately

Why This Matters

Child abuse is any form of physical, emotional or sexual mistreatment or lack of care that leads to injury or harm to a child. It commonly occurs within a relationship of trust or responsibility and is an abuse of power or a breach of trust. Abuse can happen to a person regardless of their age, gender, race or ability.

Sexual exploitation is the sexual abuse of children, young people and vulnerable adults through the exchange of sex or sexual acts for drugs, food, shelter, protection, money or other necessities of life. It is a hidden crime, and those exploited often trust their abuser and do not understand that they are being abused. The abusers exert power and control over the victims using their physical strength, economic or other resources, or apparent superiority by virtue of age, gender or intellect.

What Would You Do?

SCENARIO:

Santiago has been attending a Creative-run community center after school for the past three years. The center is located in a gang-dominated neighborhood in San Salvador, where violence is commonplace. The center provides a safe haven for children of all ages. Over the past few week, he has attended the center sporadically, and when he is there he does not seem as engaged or happy as he used to.

As a longtime counselor at the center, Maria is concerned and fears that something may be going on in Santiago's home life. What should she do?

ANSWER:

Maria has an obligation to bring this issue forward and try to determine if Santiago is in danger, in order to ensure that he is safe and protected.

5 Preventing Waste, Fraud and Abuse

Doing What's Right

As a federal government contractor, it is imperative for Creative to be good stewards of government funding in the execution of our projects and programs around the world.

What This Means

Waste, fraud and abuse takes many forms, including financial and non-financial crimes such as procurement fraud, nepotism, bribery, embezzlement, theft or product substitution. Such corruption in humanitarian assistance can be particularly egregious when it diverts resources from the most vulnerable populations. It is particularly important to remain vigilant in areas where security measures are instituted to protect staff and normal procedures are circumvented because of the immediate demands of a crisis.

Why This Matters

Creative takes its role as a responsible government contractor very seriously. When entrusted with this responsibility, we can improve the efficiency and quality of our programs by remaining vigilant against fraud and working to eliminate corruption, waste and abuse from our humanitarian work.

What Would You Do?

SCENARIO:

Naseer is responsible for vetting and hiring subcontractors in support of a Community, Family and Youth Resilience program implemented by Creative in St. Lucia. The program centers on positive youth development through community activities, sports, arts and workforce readiness initiatives that seek to build social and leadership skills. Sporting goods, supplies and other educational materials were ordered from several suppliers, but upon delivery Naseer noticed the quality from one of the suppliers was far below what was specified.

What should Naseer do?

ANSWER:

It is possible that this was a mistake, but Naseer needs to determine what really happened. This could warrant an external investigation, and if it is determined that the subcontractors did this with willful intent, it could constitute fraud.

6 Fair Competition

Doing What's Right

At Creative we seek to outperform our competitors fairly and honestly, achieving competitive advantage through superior performance and never through unethical or illegal business practices.

What This Means

Compete fairly but vigorously, never use deception or misrepresentation, and never abuse confidential information to gain an unfair advantage over our competitors.

- Becoming aware of competitive information may be normal based on your role or responsibility at the company, but make sure you treat that information ethically and lawfully
- When you talk with customers, provide only truthful information about the quality, features and availability of our services, and do not make disparaging remarks about our competitors
- Conduct all relations with competitors, including social activities, as if they will be scrutinized by the government or a third party

Why This Matters

We compete for business aggressively but always honestly. We believe in free and open competition that is vigorous and principled. We recognize that laws that regulate competition and trade practices vary around the world, but certain activities are always prohibited, such as price-fixing, agreeing with a competitor to allocate customers or territories, and bid-rigging. We comply with all applicable laws, rules and regulations that govern the way companies compete. Even the appearance of improper agreements with competitors can harm our reputation and risk legal action.

What Would You Do?

SCENARIO:

Stephen is the IT manager for a project in Uganda that is looking to outsource maintenance for its field offices. He works to post an RFP for IT services with the procurement team and a company owned by his cousin applies, along with many other minority owned and small business firms.

What should Stephen do?

ANSWER:

Stephen should immediately disclose his potential conflict of interest to his supervisor, who will then determine the best course of action. Great care should be taken to avoid the appearance of a conflict of interest. In addition, he should ensure that all firms be considered fairly and equally.

7 Responsible Sourcing and Protection of Human Rights

Doing What's Right

As a responsible, global corporate citizen, Creative seeks to do business only with business partners who obey the law and operate fairly and ethically at all times.

What This Means

Apart from doing the right thing ourselves, we must be vigilant and set the right example in our business dealings with other companies, countries and individuals.

- When you deal with current or prospective suppliers, ensure their business practices comply with Creative's values and policies
- Report to the Legal Department or the Creative reporting hotline any concern that a Creative business partner may be operating illegally or unethically

Why This Matters

- Creative embraces its responsibilities as a global corporate citizen in an increasingly interconnected and interdependent world
- We believe in acting with integrity and showing respect, and expect the same of those who want to do business with us
- We expect our business partners to act ethically and protect the rights of workers, even when local laws and customs permit unethical practices
- We are committed to maintaining an ethical and transparent supply chain free of forced labor, including slavery, human trafficking and sexual exploitation

> *"At Creative, we embrace our role as a responsible, global corporate citizen."*

What Would You Do?

SCENARIO:

When performing site visits for potential training venues in Bangladesh, Jamal, the local events coordinator, notices many young children cleaning the meeting rooms. The venue offers a great price, and the manager later remarks that it is great that his employees all bring their kids to work as it allows him to offer an attractive price to potential clients.

Is this a problem? If so, how should Jamal proceed?

ANSWER:

Yes, child labor is against Creative's policies, and this could be considered human trafficking. This practice is not allowed even though it may be customary or even legal in a given country. Jamal should report this practice to his supervisor, who will refer it to the Legal Department to decide if this venue can be used.

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The Creative Way *for...*

Our Communities

At Creative, we embrace our role as a responsible, global corporate citizen. We take our environmental responsibilities seriously, and we are honored to contribute to the communities in which we work and live. We look for opportunities to create brighter futures for our clients, employees, communities and the environment everywhere we do business.

1 Protecting the Environment

Doing What's Right

We are committed to building a more sustainable society by striving to minimize our environmental footprint and developing solutions that conserve resources and protect our planet.

What This Means

As we support people around the world, we must all contribute to Creative's environmental stewardship efforts in the following ways:

- Comply with all applicable environmental laws and company policies
- Meet the requirements of all environmental permits
- Be vigilant to ensure we do not use more energy or water than necessary
- Ensure our supplier and business partners follow agreed-upon environmental standards
- Minimize waste and recycle or find appropriate alternate uses for waste materials
- Take personal actions such as turning off lights, using less paper, shutting off electronics and recycling – small actions can make a big difference

Why This Matters

Creative has been committed to good stewardship of the environment since our founding more than 40 years ago. Today, it is widely agreed that humankind is using the earth's natural resources faster than they can regenerate and that everyone needs to play a part in building a more environmentally sustainable society.

What Would You Do?

SCENARIO:

As a backstop on one of Creative's Nigeria based program, Kadedhra recently visited the region to learn more about the respective projects and meet some of her colleagues in the field. While in country she was informed that several of the suppliers utilized were circumventing environmental regulations while providing goods and services.

What steps can Kadedhra take to be environmentally responsible?

ANSWER:

Creative strives to minimize any negative impact on the environment from its activities and operations. This includes taking specific measures in projects that involve construction and certain agricultural interventions. Since Kadedhra was informed of suppliers circumventing environmental regulations, she has an obligation to report the issue.

2 Contributing to Our Communities

Doing What's Right

We are committed to supporting the communities where our employees live and work, while exploring ways to address broader challenges around the world.

What This Means

There are many ways we can contribute positively to our communities, such as:

- Following Creative's values and upholding the standards in this Code to ensure we always conduct our business ethically and in accordance with the law
- Ensuring that outside activities do not interfere with our job performance or create a conflict of interest
- Verifying that the company's charitable contributions comply with applicable laws

Why This Matters

At Creative, we have a long history of investing in our communities and believe in giving back in meaningful ways.

What Would You Do?

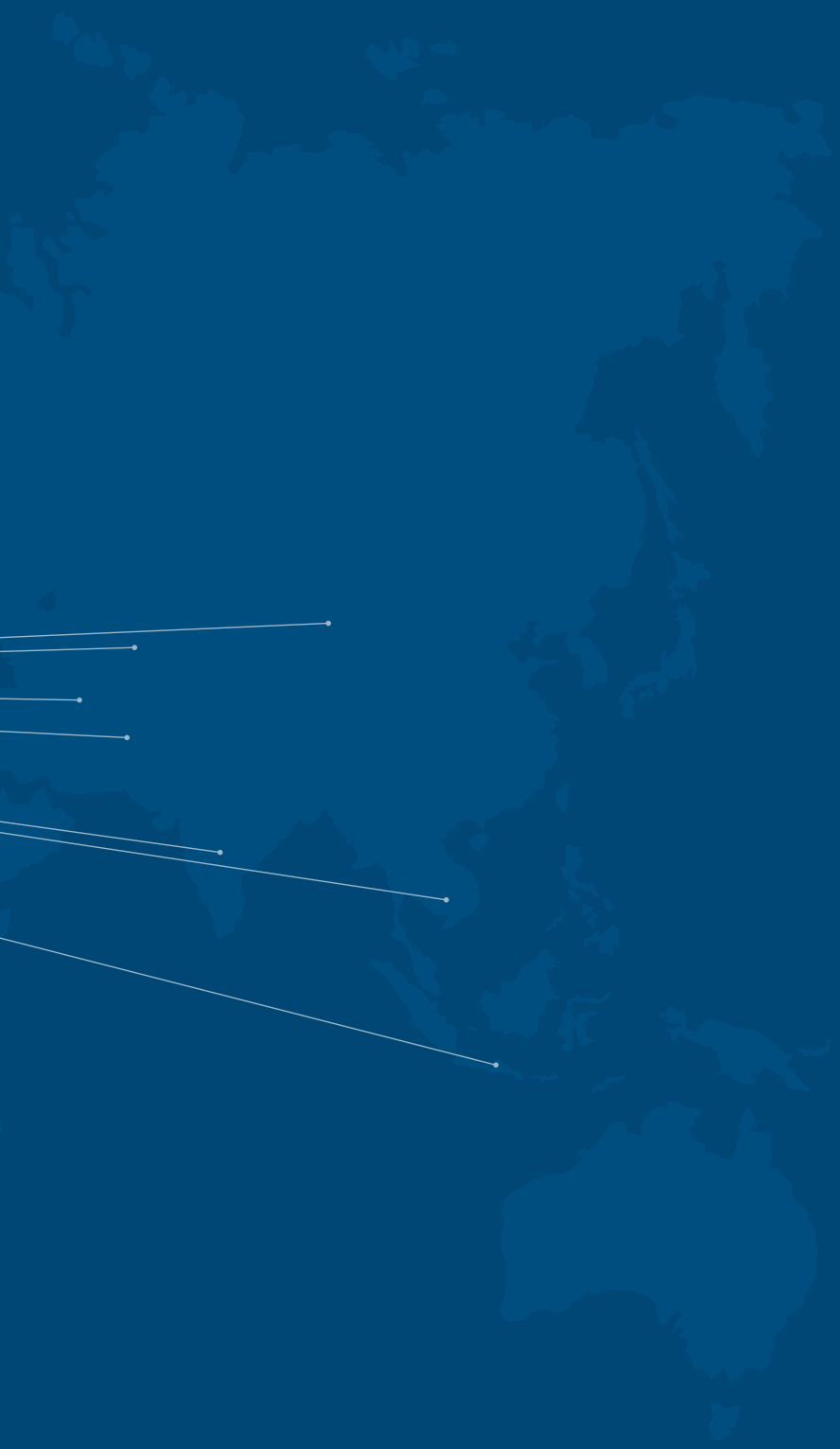
SCENARIO:

Arturo works in the Finance and Contracts organization at Creative's HQ. He is very active in his local community and volunteers for several organizations that benefit families who have recently moved to the US from Central American countries.

Do Arturo's outside interests present a problem or conflict?

ANSWER:

It does not appear that his volunteer interest presents any problem or conflict with company activities. Creative actively encourages employees to become involved in their communities consistent with our company values.



Integrity

Values

Trust

Teamwork

Community

Customer Focus

Stability

Respect

Diversity

Inclusion

Positive Change

PEACE.

Creative Associates International
4445 Willard Avenue, Suite 600
Chevy Chase, MD 20815

+202.966.5804

www.CreativeAssociatesInternational.com