



## SSI Responsible Conduct of Research Policy (RCR)

### PURPOSE

This policy reflects a code of conduct that requires directors, officers and employees of Sustainable Sciences Institute (SSI) to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of SSI, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations. It also is our responsibility to report violations of this Code in accordance with this Policy. No director, officer or employee who in good faith reports a violation of the Code shall suffer harassment, retaliation or adverse employment consequence.

### POLICY

#### Code of Conduct

The directors, officer and employees of this organization are expected to adhere to high standards of ethical conduct. Although it is impossible to describe all conduct that is addressed, this policy specifically requires the following:

1. Dedication to SSI's mission, vision and core values and recognition that the chief function of SSI at all times is to serve the best interests of our constituency.
2. The responsible and prudent management of SSI's funds and assets.
3. Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships.
4. Full, fair, accurate and timely disclosure of relevant facts in all reports and documents dealing with matter of program service, governance and business administration.
5. Compliance with all applicable governmental laws, rules and regulations.
6. Treatment of all persons with respect, equity and fairness regardless of race, religion, gender, ability, age or national origin.
7. Respect and protection of confidential and/or privileged information to which we have access in the course of our duties.
8. Prompt internal reporting of code violations to an appropriate person or persons within the organization.
9. Personal accountability for adherence to this Code of Conduct.

Please note that employees must comply with all US and local laws, including the Foreign Corrupt Practices Act of 1977 (<http://www.justice.gov/criminal/fraud/fcpa>) and the DHHS Public Health Service Policies on Research Misconduct ([http://ori.dhhs.gov/sites/default/files/42\\_cfr\\_parts\\_50\\_and\\_93\\_2005.pdf](http://ori.dhhs.gov/sites/default/files/42_cfr_parts_50_and_93_2005.pdf)).



## **Reporting Responsibility**

It is the responsibility of all directors, officers and employees to comply with the Code and to report violations or suspected violations in accordance with this Whistleblower Policy. Under this policy, it is a disciplinary issue for an employee to know of ethical misconduct and stay silent.

## **No Retaliation**

No director, officer or employee who in good faith reports a violation of the Code shall suffer harassment, retaliation or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within SSI prior to seeking resolution outside the organization.

## **Reporting Violations**

The Code addresses SSI's open door policy and suggests that employees share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee's supervisor is in the best position to address an area of concern. However, if you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with the Executive Director or anyone in management whom you are comfortable in approaching. Supervisors and managers are required to report suspected violations of the Code of Conduct to the Compliance Officer, who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when you are not satisfied or uncomfortable with following SSI's open door policy, individuals should contact the Compliance Officer directly.

## **Compliance Officer**

SSI's Compliance Officer is the Chair of the Audit Committee. The Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Code and, shall advise the Executive Director and/or the Audit Committee. The Compliance Officer has direct access to the Audit Committee of the Board of Directors and is required to report to the Audit Committee at least annually on compliance activity.

The Compliance Officer in Nicaragua is Lionel Gresh, and the Compliance Officer in Egypt is Mar-Jan Ostrowski. The Audit Committee is comprised of the Compliance Officer, ED Josefina Coloma, and Board Member Sondra Shelessinger.

## **Accounting and Auditing Matters**

In the event that a reported concern or complaint involves corporate accounting practices or internal controls of auditing, the Compliance Officer shall immediately notify the Audit Committee of the complaint and work with the Committee until the matter is resolved. The Audit Committee of



the board of directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing.

## **Acting in Good Faith**

Anyone filing a complaint concerning a violation or suspected violation of the Code must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

## **Confidentiality**

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

## **Handling of Reported Violations**

The Compliance Officer will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

## **Acknowledgement and Distribution of Policy**

As it is the intent of SSI to strive for high ethical conduct from all board and staff, the Board of Directors is particularly sensitive to individuals who hold management and governance positions of trust and confidence in fulfilling the mission and goals of SSI. These sensitive positions include all officers, members of the Board of Directors, the Executive Director and key Senior Staff members designated by the Executive Director. Therefore, each of the above staff will receive a copy of this Policy, and any subsequent updates, and will be requested to acknowledge and sign this Code by July 1 each year. This acknowledgement will be kept on file in the personnel files of each staff member and in the Board files for each Board members.

**This Policy was duly adopted on June 1, 2012.**