



Innovations for Poverty Action	Code of Conduct	
Owner: General Counsel/ Chief Compliance Officer	Revision Date: 01/25/22	Revision No.: V2

Purpose

Innovation for Poverty Action’s mission to discover and promote effective solutions to global poverty problems requires all members of the IPA community to share a commitment to integrity, collaboration, respect, humility, excellence, and creativity. The commitment can be sustained, however, only if our actions as members of the IPA community are beyond ethical reproach. The success and reputation of IPA in fulfilling its core mission depends upon the integrity with which each community member — whether employee, subawardee, vendor/supplier, consultant, principal investigator/researcher, or any other collaborative partner — participates in our joint endeavor. Accordingly, each member of IPA is expected to adhere to IPA’s Code of Conduct and associated relevant policies.

As a charitable organization, IPA has a special obligation to uphold the public trust. In furtherance of this obligation, IPA is committed to ensuring that we maintain the highest ethical and legal standards in all we do. We strive to comply with the spirit and letter of all laws and regulations in each of the countries in which we operate. Our reputation and business success depends upon it. This Code of Conduct is designed to ensure that all of us understand the obligations placed upon us by our Code of Conduct and relevant laws and regulations, and provides guidance as to IPA’s expectations. It is fundamental to how we deliver on our mission, and reinforces the responsibilities we all share in protecting IPA’s brand and reputation.

We will:

1. Comply with the laws and regulations of all countries where we do business, and refrain from engaging in any improper transactions.
2. Respect others in the context of a work environment that is cooperative, safe, and free of unlawful discrimination.
3. Avoid conflicts of interest.
4. Protect confidential and proprietary information.

Every member of the IPA community is expected to comply with the Code of Conduct and associated relevant policies. All management level staff are required to affirm their compliance annually.

Questions about the applicability of the Code of Conduct or the referenced policies in particular circumstances may be addressed to the General Counsel/ Chief Compliance Officer at sdaves-ohlin@poverty-action.org. The confidential and anonymous channel to report any concerns is the IPA Whistleblower Hotline: +1-844-837-5445 or www.lighthouse-services.com/poverty-action.

Policy Statements

COMPLYING WITH APPLICABLE LAWS AND REGULATIONS

Compliance with laws is important as a matter of principle. One must recognize that noncompliance can have severe adverse financial and other consequences, potentially affecting the reputation and operations of the entire organization. IPA expects its directors, officers, employees, consultants, subawardees, and principal investigators/researchers to respect and obey all applicable laws and regulations. Staff are also required to observe the laws and regulations in the countries in which they travel, including each country's currency exchange regulations. IPA receives funding from the U.S. Government, along with other donors, thus the laws and regulations applicable to IPA are complex. It is important to seek advice from the Legal Department to ensure compliance with applicable laws and regulations.

RESEARCH MISCONDUCT

Research misconduct is defined as intentional, knowing, or reckless fabrication, falsification, or plagiarism in proposing, performing, or reviewing research. This can include falsifying interviews, telling survey respondents how to answer a question, making up data, or removing or deleting inconvenient data. It can also include making up references or listing or failing to list paper authors for reasons not related to actual contribution, including as a gift, to enhance credibility or increase the likelihood of publication, or to reward a funder or senior colleague.

Research misconduct undermines the scientific search for truth. It also undermines the credibility of researchers and the whole research enterprise, reducing confidence in research from research partners, funders, users, and the general public. In turn, this can reduce the financial support from the government and other sponsors of research and result in the uptake of ineffective or inefficient interventions and harm the search for solutions to poverty.

Each IPA staff member, contractor, and affiliated researcher has a responsibility to foster an environment of intellectual honesty and integrity. Accordingly, IPA staff, contractors, and affiliated researchers must not engage in research misconduct, and must report any suspected misconduct. IPA employees or contractors who observe or suspect research misconduct by anyone in association with an IPA study (staff member, affiliated researcher or other stakeholder), should report it immediately to their supervisor or to the designated committee on research ethics, which includes the IPA Chief Research & Methodology Officer and the IPA Research Ethics Manager. All

reported allegations of misconduct will be reviewed and, if appropriate, referred for investigation.

For more detail, see the full version of IPA's Research Misconduct Policy, maintained on the IPA Global Help Desk.

PROTECTING OUR REPUTATION BY NOT ENGAGING IN IMPROPER BUSINESS TRANSACTIONS

IPA expects its employees, consultants, and principal investigators/researchers to protect IPA's reputation in the global marketplace. As part of that expectation, IPA requires compliance with all applicable international business laws, such as the U.S. Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act 2010, and similar laws of the countries in which IPA operates. The FCPA is a U.S. anti-bribery statute that makes it a crime to bribe or influence a "foreign official" to obtain or retain business or to secure an improper advantage. All officers, directors, staff, agents, consultants, suppliers, and principal investigators/researchers are subject to FCPA and UK Bribery Act statutes regardless of whether they are based in the US or abroad.

See IPA's Anti-Bribery Policy on the Global Help Desk and in the Employee Handbook.

PROPER USE OF COMPANY ASSETS

All directors, officers and employees should treat IPA property with care and expend funds prudently. Theft, carelessness, inappropriate usage and waste have a direct impact on IPA's financial position and can potentially tarnish our reputation. Any suspected incident of fraud or theft should be immediately reported to the Chief Financial Officer and/or General Counsel/ Chief Compliance Officer.

See IPA's Information & Communication Technology – Electronic Communication Policy in the Employee Handbook.

MAINTAINING FINANCIAL INTEGRITY

IPA's financial books, records, cost accounts, and financial statements shall properly document all assets and liabilities, accurately reflect all transactions of IPA, and be retained in accordance with IPA policy and applicable laws and regulations. IPA funds may not be used for any unethical purpose. No false entries shall be made on the books or records of IPA for any reason. All funds and assets must be fully and properly disclosed and recorded. All company books, records, accounts, and financial statements must be maintained in reasonable detail, must appropriately reflect IPA's transactions, and conform to applicable legal requirements and to our system of internal controls. Any concerns about financial reporting to donors should be raised with the Director of Grants. Complaints or concerns regarding IPA's accounting, internal accounting controls, or auditing matters should be communicated to the Chief Financial Officer.

ACCURATELY CHARGING TIME SPENT & OTHER COSTS

Accurately charging time, material and other costs is critical to maintain the integrity of donor billings, financial reporting, and planning. Deliberate mischarging or overcharging of work time or costs, and knowingly approving mischarging or overcharging of work time or costs, violates IPA policy and the law. Knowingly charging an inappropriate account, and knowingly approving such mischarging, or shifting of costs to improper accounts is prohibited. Each employee is responsible for ensuring that time spent, travel, materials, and other expenses are recorded truthfully and accurately. The Finance Manager should be contacted if an employee has questions or concerns about proper charging of time and other costs.

MARKET, BID, NEGOTIATE AND PERFORM IN GOOD FAITH

Truthful and accurate communication of information about our services, projects and results, is essential to meeting our commitments to our donors, and to maintaining our reputation with the public. Employees must be honest in marketing, in preparing bid proposals based on properly estimated cost and pricing data, in truthfully negotiating contracts and grants, and in financial program and data reporting. Excellence in performance must include compliance with grant/contract specifications and requirements.

RESPECTING OTHERS

The promotion of equal opportunity in the workplace enhances basic human dignity and the welfare of the society upon which the success of our business depends. It is the policy of IPA to affirmatively ensure that all employment decisions are based upon ability, experience and achievement, without regard to race, creed, color, religion, national or ethnic origin, ancestry, disability (including HIV/AIDS), sex, marital status, familial status, military or veteran status, sexual orientation, genetic information, gender identity or expression, status as a victim of domestic violence, or any other factors as prohibited by applicable law. IPA leaders at all levels have a special obligation to encourage an open work environment where employees are treated respectfully and may raise issues or concerns without fear of retaliation. It is further the policy of IPA to provide a work environment that is cooperative, safe, conducive to good job performance, and free of all forms of unlawful discrimination or harassment. We strictly prohibit discrimination and/or harassment against an individual based on race, creed, color, religion, national or ethnic origin, ancestry, age, disability (including HIV/AIDS), sex, marital status, familial status, military or veteran status, sexual orientation, genetic information, gender identity or expression, status as a victim of domestic violence, and any other factors as prohibited by applicable law. All IPA employees are responsible for ensuring that the workplace is free from such discrimination and/or harassment.

IPA is additionally committed to preventing workplace bullying and maintaining a safe work environment. Conduct that threatens, intimidates or coerces a staff member will not

be tolerated. Indirect or direct threats of violence and incidents of actual bullying should be reported to a manager or any member of senior management immediately. The manager or senior manager should then immediately report the incident to headquarters human resources to investigate.

See IPA's Anti-Discrimination, Anti-Harassment, Anti-Bullying and Anti-Nepotism and Fraternalization Policies in the Employee Handbook.

SAFEGUARDING CHILDREN AND VULNERABLE ADULTS

IPA is committed to conducting its research and operations in a manner that is safe for all people, especially those that are most susceptible to abuse. IPA will comply with all applicable child protection laws and regulations (host country and US). In addition, IPA will take measures to ensure the safeguarding children and vulnerable adults against physical, sexual and/or emotional abuse, exploitation, sexual exploitation, and neglect and has zero tolerance for any such behavior by its board members, staff, vendors, subrecipients, contractors, principal investigators, project partners, and others who work with or for IPA. See Safeguarding Policy on the Global Help Desk and in the Employee Handbook.

COMBATING TRAFFICKING IN PERSONS

IPA is committed to ensuring compliance with the U.S. Government's zero-tolerance policy regarding trafficking in persons, and as such has adopted a comprehensive policy and model monitoring plan.

See IPA's Trafficking policy and monitoring plan located on IPA's website and the Global Help Desk.

MAINTAINING A DRUG AND ALCOHOL FREE WORKPLACE

IPA maintains a drug-free workplace and strictly prohibits the unlawful manufacturing, distribution, dispensation, purchase, sale, exchange or possession or usage of a controlled substance at any location where IPA conducts business. IPA further prohibits the misuse and /or abuse of alcohol beverages or prescribed medications at any location where IPA conducts business.

See IPA's Alcohol and Drug Policy in the Employee Handbook.

AVOIDING CONFLICTS OF INTEREST AND DISCLOSING POTENTIAL CONFLICTS OF INTEREST

Conflicts of interest must be avoided at all times. Examples of such conflicts could include: employment by a competitor, placement of business where the employee or employee's family member has a financial stake, employees acting independently as a consultant to a donor or supplier of IPA, or accepting anything of value not approved pursuant to the

Gift and Entertainment Policy from a supplier/vendor or potential supplier/vendor. Directors and officers are prohibited from personally taking for themselves opportunities discovered using IPA information, position, or property. No IPA information, position, or property may be used for improper personal gain. Conflicts of interest must be disclosed, reviewed, and appropriately managed or eliminated. One should demonstrate sensitivity in identifying potential conflicts of interest, whether of a financial, personal, or professional nature. Any relationship or activity which could or would influence, or appear to influence performance of one's duties to IPA, impact loyalty to IPA, accepting gifts outside IPA's Gift and Entertainment Policy, or personal taking of company opportunities, must be disclosed to the General Counsel/ Chief Compliance Officer in accordance with IPA's Conflict of Interest Policy, for review and resolution.

See IPA's Conflict of Interest Policy for Directors, Officers and Key Employees and IPA's Staff Conflict of Interest Policy which are on the Global Help Desk and in the Employee Handbook.

ANTI-TERRORIST ACTIVITIES

Employees (a) must not engage in, conduct, or directly or indirectly support terrorist activity of any kind; (b) must not be associated with or engaged in any transaction with any individual or entity that the staff member knows or should have reason to know advocates, supports, plans, sponsors or engages in terrorist activity; and (c) must not be controlled by, or act for or on behalf of, any individual or entity that the staff member knows or should have reason to know advocates, supports, plans, sponsors or engages in terrorist activity.

FOLLOWING THE RESTRICTIONS ON HIRING FORMER GOVERNMENT OR COMPETITOR EMPLOYEES

Any discussion or contacts with current or former U.S Government employees for the purpose of exploring potential employment or consulting opportunities with IPA are subject to U.S. laws and regulations. Similarly, once hired or engaged, these individuals may be prohibited from certain tasks and duties that relate to their prior responsibilities while working for the U.S. Government. Please consult with the Legal Department to ensure compliance with these laws. Also, when hiring an employee who has worked for a competitor or other third party, we must ensure that their proprietary information and intellectual property is not brought into IPA or used by IPA without authorization from the competitor or third party. Likewise, when IPA employees leave IPA, they are not permitted to take proprietary information to a competitor.

REFRAINING FROM OUTSIDE EMPLOYMENT OR ACTIVITIES THAT MAY IMPAIR RESPONSIBILITIES TO IPA

Salaried officers and employees of IPA are expected to devote their full time to the promotion of IPA's stated interest and refrain from using their positions with IPA to supplement their incomes directly or indirectly or to obtain other material benefit outside

normal compensation. Expatriate employees (U.S. and third-country nationals) are prohibited from directly or indirectly engaging in any business or investments in country of assignment. No host country national employee or consultant may directly or indirectly be engaged or financially involved in, any enterprise, business or project to which IPA is providing assistance. No IPA full-time host country national employee may be employed by, either as an employee or consultant, any enterprise, company, business or organization without the prior written approval of his/her manager.

AVOIDING ACCEPTING OR GIVING IMPROPER GIFTS

IPA's Gift and Entertainment Policy and Conflict of Interest Policy require the use of good judgment and compliance with laws related to giving or accepting gifts. Employees should never accept gifts from vendors/suppliers, clients, partners or other stakeholders which exceed the lesser of (a) \$50 per gift or (b) employee's daily rate of base salary per gift. In the aggregate, employees should never accept gifts from a vendor/supplier, client, partner or other stakeholder which exceed the lesser of (x) \$100 per calendar year or (y) one day employee's daily rate of base salary. These limits are imposed in order to avoid the appearance of favoritism. In such cases that gifts are received within the aforementioned limits, the gifts should be donated to IPA.

Government employees, both in the U.S. and in other countries are subject to varied, complex rules, which in many cases disallow them from accepting any items of value except as specifically provided under the applicable laws and regulations. For example, U.S. government executive branch employees (e.g. State Department, USAID and USDA) should not accept gifts exceeding \$20 on a single occasion, and not exceeding \$50 in a calendar year. In addition, many donors also have rules relating to giving or accepting gifts. Prior to making any gifts to an IPA donor, employees must confer with the Legal Department.

See IPA's Gift and Entertainment Policy on the Global Help Desk and in the Employee Handbook.

APPROPRIATE TREATMENT OF CONFIDENTIAL INFORMATION

In various capacities, members of the IPA community become privy to confidential information of many different types. Such information may concern research ideas and innovative approaches to development, survey respondents, employees or donors. IPA requires that one maintain the confidentiality of IPA proprietary information both while employed by IPA and after they leave. Likewise, one may not use anyone else's proprietary information, regardless of how it was obtained, without prior authorization from the owner.

See IPA's Confidentiality Policy in the Employee Handbook.

APPROPRIATELY RETAINING RECORDS

IPA records should always be retained or destroyed in accordance with IPA's Record Retention Policy. In the event of litigation or governmental investigation, the Legal Department must be consulted regarding record retention issues.

See IPA's Record Retention Policy on the Global Help Desk and in the Employee Handbook.

REPORTING ILLEGAL OR UNETHICAL BEHAVIOR

Members of the IPA community shall report any conduct which they believe in good faith to be a violation or suspected violation of IPA's Code of Conduct. IPA prohibits retaliation for reports of misconduct by others made in good faith. For those who wish to report a concern or alleged violation in confidence, confidentiality will be maintained to the extent possible, although limited disclosure may be necessary in some cases to conduct an effective investigation or where compelled by law. If the individual is not comfortable bringing their concern to their manager or to the General Counsel/ Chief Compliance Officer, they may always contact the IPA Whistleblower Hotline at www.lighthouse-services.com/poverty-action or +1-844-837-5445, where their concern can be reported anonymously. Reports will be investigated, and if substantiated, resolved through appropriate corrective action. Those found to have violated IPA's Code of Conduct will be subject to disciplinary action, up to and including termination of employment.

For FCDO funded projects, in addition to the reporting options listed above, suspicions or allegations of aid diversion, fraud, money laundering or funding of terrorism, may also be reported directly to FCDO at reportingconcerns@FCDO.gov.uk or on +44(0)135584374.

See IPA's Whistleblower Policy on the Global Help Desk and in the Employee Handbook.

COMPLYING WITH CONTRACTS, GRANTS AND PRIVATE OBLIGATIONS

In the course of its operations, IPA frequently undertakes contractual and other formal obligations to outside entities. These obligations are embodied, for example, in subcontracts, vendor contracts for the purchase of goods or services, grant awards, and memoranda of understanding with other organizations. It is expected that one adheres closely and acts in good faith with regard to all applicable private obligations assumed by IPA. For any questions or clarifications concerning these obligations please contact the IPA Grants Department.

SAFETY AND SECURITY

One must adhere to all legal and organizational health and safety requirements in force at the location of their work. They should comply with any local security guidelines and be pro-active in informing management of any necessary changes to such guidelines. IPA expects one to act in such a way as to avoid any unnecessary risk to the safety, health and welfare of himself/herself and others, including partner organizations and

beneficiaries.

See IPA's Safety and Security Policy and Procedures located on the Global Helpdesk.