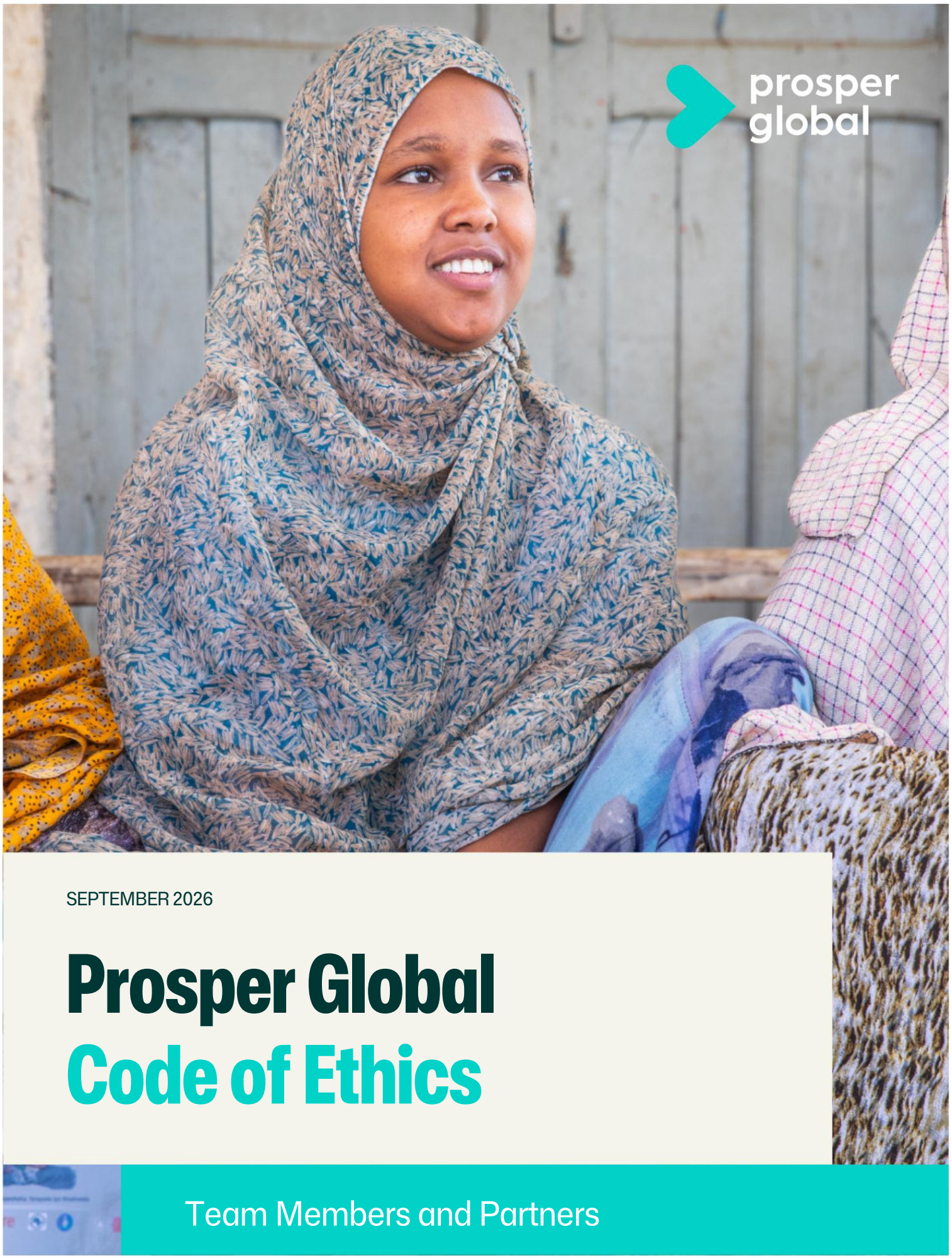

prosper global

SEPTEMBER 2026

Prosper Global
Code of Ethics

Team Members and Partners

Message from the Chief Executive Officer

As Prosper Global's CEO, I am fortunate to hear regularly from our team members around the world about our impact in helping people build secure, productive and just communities. Our work positively affects the lives of millions of people each year, and is delivered in partnership with donors, other organizations and the communities we support.

We also know that as a humanitarian and development organization, we often encounter communities at their greatest moments of need – whether that is due to the impact of natural disaster, conflict, climate change or economic collapse. In the environments in which Prosper Global works, there is a significant disparity in power between the communities we work with and the organizations, like ours, that support them.

As such, we must hold ourselves and our partners to the highest levels of ethical conduct. No organization can ever say it is free from the risk of abuse. Instead, all organizations must put in place clear expectations and then hold themselves and their partners accountable for those expectations, and learn from where they fall short. Only through these actions can we truly live our values as an organization, and create the trusted relationships – with partners, donors and communities – that are the cornerstone of our efforts to help create a future where everyone can prosper.

It is clear that, in both the recent and further past, Prosper Global has fallen short of what should be expected of the organization's leadership and our accountability to a survivor of abuse and our broader community. In response to this failing, we have been open about our commitments to action and the progress we have made in restructuring and strengthening our legal, ethics and safeguarding functions, updating policies and strengthening Board governance.

This updated Code of Ethics is part of that broader work and makes clear the expectations we have for all Prosper Global team members and partners. Importantly, it provides the framework for every one of us to ensure we're individually making ethical decisions in difficult or uncertain situations and collectively continuing to build a culture of integrity and accountability.

In addition, the ongoing improvements to our investigative processes and increased capacity in this area ensure that communities and partners have the opportunity to report allegations of misconduct, and that those will be thoroughly investigated and reviewed under the newly created office of the Chief Ethics and Compliance Officer, with the appropriate consequences where misconduct is found to have taken place.

We extend our thanks to the team members who contributed to the creation of our Code of Ethics, and to everyone across the organization who contributes to a culture of integrity at Prosper Global through your words and deeds every day.

Tjada D'Oyen McKenna

Chief Executive Officer

Message from the Chief Ethics and Compliance Officer

Our reputation for honesty and integrity is among our most valuable assets. Strong ethical values help build trust with partner communities. Ethical lapses in our organization can result in severe damage to Prosper Global's reputation and erode trust with team members and external stakeholders. It can also expose us to enforcement proceedings, fines and litigation, among other serious consequences and impede our ability to accomplish our mission. Safeguarding violations can cause deep and lasting harm to the individuals and communities where we work.

Under these circumstances, it is critical that Prosper Global has a strong and clear set of values to help every team member adhere to the highest ethical standards. By practicing these values, we can continue to build and maintain the trust of team members, our partners, donors, and the communities with which we work.

This Code of Ethics, together with Prosper Global's policies, gives you the information necessary to perform your job ethically by setting out general principles of behavior and providing practical examples. Of course, no single document can answer all questions or address every situation, which is why we have team members and other guidance documents available for assistance. Our ethics and assurance managers, champions, and our focal points in each country help us to live our Code. If you are ever in doubt on any ethical matter, I encourage you to ask questions via the Integrity Hotline and/or consult with the Ethics and Compliance Department (which has a dedicated Hub page) as well as your own team managers. Prosper Global is committed to fostering an environment in which team members can speak up without fear of retaliation.

I believe that our commitment to ethics and compliance will continue to be a key component of our long-term success.

Respectfully,

Steve Linick

Steve Linick

Chief Ethics and Compliance Officer

Message from the Leadership Team

This Code applies to everyone at Prosper Global regardless of location, position, and level of responsibility. As a Leadership Team we are committed to living the values set forth in this Code of Ethics and creating a work environment that supports ethically sound behavior and instills a sense of shared accountability. We pledge to lead by example and integrate ethics into our decision making and day-to-day work.

Each of us is an ambassador for Prosper Global, which means each of us contributes to Prosper Global's reputation by following this Code. This Code covers a wide range of topics, including fraud and corruption, safeguarding, discrimination, harassment, and bullying, safety and security, privacy and data protection, responsible use of social media and Prosper Global resources, political activity and lobbying, environmental stewardship and our obligations to partners, donors, and communities. We urge you to become thoroughly familiar with the Code and to incorporate its principles into all aspects of your work.

And most importantly, don't forget to speak up if you ever notice anything that conflicts with our values and standards. When we don't voice our concerns, serious harm can be done to our culture and reputation. Retaliation against those who raise concerns in good faith is strictly prohibited.

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Introduction

We are a global team of humanitarians who partner with individuals, communities, organizations, and governments to transform lives around the world.

Our mission is to alleviate suffering, poverty, and oppression by helping people build secure, productive, and just communities. In more than 40 countries around the world, our nearly 6,000 team members work side by side with people living through poverty, disaster, violent conflict and the acute impacts of climate change. We're committed to creating global change through local impact – 85 percent of our team members are from the countries where they work.

As a global humanitarian organization serving the world's most vulnerable communities, we take our responsibility to program participants, partners, donors, and team members across the countries in which we work, seriously. We acknowledge that building and maintaining trust with the communities we serve is paramount to achieving our mission and are committed to responsibly managing that privilege to ensure that we never cause harm. We are guided by the ethical principles embedded in our policies and procedures and this Code of Ethics.

The Core Principles of Our Code of Ethics

These principles drive our actions and work and are fundamental to who we are as an organization. This Code is guided by Prosper Global's commitment to ethical standards as a global non-profit, and consistent with applicable law and the humanitarian principles of humanity, impartiality, neutrality, and independence. We carry out humanitarian action based on need, prioritizing the most underrepresented and at-risk populations. We work beyond the borders of politics, religion, culture, race, and ethnicity with organizations and individuals that share common values and objectives. We strive for neutrality in all situations and do not take sides in a conflict or engage in political, religious or other controversies. We may, however, call out injustices and atrocities when we see them.

Integrity

We operate with integrity by maintaining high standards of ethics in everything we do, both in our work for Prosper Global and in our personal lives. We demonstrate integrity by acting with courage and choosing to practice our values rather than simply professing them.

Honesty

We are honest and transparent in our dealings with everyone, including participants, community members, our colleagues, partners, and donors.

Respect

We treat all people with dignity; free of exploitation, harassment, bullying or discrimination. We are respectful in our interactions with each other. We respect the culture and perspectives of communities and countries where we work. We strive to address the root causes of inequality and model the power of diversity, inclusion, and gender equality in who we are and how we partner with communities.

Accountability

We hold ourselves accountable to each other and to this Code, and if we become aware of potential violations, we promptly report them. We also hold ourselves accountable to the needs, priorities and rights of affected populations and to those from whom we accept resources. We comply with all applicable laws and regulations and adhere to Prosper Global's policies and procedures.

Who Does This Code Apply To?

The Code of Ethics applies to Prosper Global, Prosper Global Europe, and Prosper Global Netherlands, their subsidiaries, and affiliate organizations (collectively, "Prosper Global"), including members of Prosper Global's Board of Directors, officers, management, employees, seconded employees, daily workers, interns, and volunteers (collectively "team members"). All Prosper Global team members are required to sign an acknowledgement to show they have read, understood and will comply with the Code of Ethics. As Prosper Global team members, we are ambassadors of the organization and our actions and behavior both during and outside of work hours (whether inside or outside of the office environment) can enhance or hinder our reputation and impact our participants. As such, Prosper Global team members are responsible for managing their behavior within and beyond our work in accordance with this Code of Ethics and associated policies and procedures. Prosper Global team members are also obligated to cooperate with relevant investigations and audits. Managers at all levels have a particular responsibility to uphold these standards, lead by example, and create a working environment that supports all team members in reaching their potential. In addition, we must ensure that partners[1] are informed of our ethical standards and policies.

[1] Partners include sub-recipients, partner organizations, contractors, outside experts, consultants, agents, representatives, and any other organizations or individuals that act on Prosper Global's behalf or at Prosper Global's direction.

How to Use This Code of Ethics

Our Code of Ethics provides a high-level summary of many of our policies, standards and expectations. It also includes references to relevant policies and other helpful tools and resources if you need additional information. This Code should act as a framework to help us make ethical decisions and handle day-to-day challenges. Although this Code won't tell you exactly what to do in every situation that may arise, it serves as a guide to help you make ethical decisions and navigate complex situations where the answer may not always be clear. It also provides guidance on whom to contact when you have questions. This Code also includes Q&As with real-life examples. Of course, no document can anticipate and address every situation that may arise. So, whenever you face difficult decisions or unclear circumstances, ask yourself the following questions:

> **Does the situation make you uneasy? Are your instincts telling you something is not right? Do you sense an unacknowledged risk?**
>
> **Is the proposed decision, behavior, or action inconsistent with Prosper Global's Code of Ethics, or policies?**
>
> **Could someone potentially be harmed? Could your participation in this situation undermine trust between team members or the people with whom we interact?**
>
> **Would you feel concerned if this were made public, internally within Prosper Global or externally, for example, on the front page of a newspaper?**
>
> **Is the decision or action illegal?**

This Code does not replace any existing policies, and you should continue to comply with Prosper Global's policies and procedures. This Code aims to provide an overarching ethical framework for these policies, so that it is easier for you to understand the rationale behind them and put them into action. This Code is not exhaustive, and its content may be updated. Prosper Global is also subject to the laws and regulations of each jurisdiction where we work. In addition to this Code, you are responsible for knowing and complying with the laws, regulations and other rules applicable to your work.

If you believe there is a conflict between the Code and a relevant policy, or with applicable law, please seek guidance from the Legal or the Ethics and Compliance departments. Our Ethics and Compliance Department is available to each team member and partner of Prosper Global as a point of contact for matters regarding the Code of Ethics that require clarification. More information about the Ethics and Compliance Department is available on the Ethics and Compliance Hub page.

Compliance with Prosper Global's policies is a condition of your employment or affiliation with Prosper Global. Violation of our policies may result in disciplinary action, including, if appropriate, termination of employment.

Ethical Commitments

Corruption

Prosper Global is committed to conducting business fairly, honestly, and openly. Prosper Global does not tolerate any form of corruption – bribery, facilitation payments, kickbacks or other improper payments–in any of our business transactions or relationships with third parties, including government or other officials or any of our partners, suppliers, contractors, or parties to sub-agreements. Involvement in fraud or corruption can result in severe damage to Prosper Global's reputation and expose us to enforcement proceedings, multi-million dollar fines, litigation, and suspension and debarment from donor funding, among other serious consequences. Simply put, corruption is not acceptable - even if the activities and behaviors are permitted or tolerated in some of the contexts in which we work.

Bribery is offering, giving, soliciting, or receiving anything of value (money, gifts, travel, personal favors, discounts, entertainment, etc.) for the purpose of gaining or keeping business or otherwise securing an improper advantage. Bribery involves some sort of collusion or agreement between at least two parties. Gifts, meals, and entertainment offered to, or received from third parties are generally prohibited except under limited circumstances as defined in the Anti-Fraud and Anti- Corruption Policy.

Facilitation payments are payments made to secure or speed up routine actions, such as issuing visas, permits, immigration checks, licenses, minor official approvals, or releasing goods held in customs. Facilitation payments are not permissible and are strictly prohibited by Prosper Global, except under limited circumstances as defined in Prosper Global's Anti-Fraud and Anti-Corruption Policy.

We must:

- Immediately report to a supervisor, trusted leader, or the Integrity Hotline any misconduct or suspicious activity involving corruption.
- Immediately report any payments demanded under circumstances where safety is at risk (payments made under duress will not result in disciplinary action).
- Maintain accurate and complete records (including, among others, purchase orders, invoices, expense reports, and statements of work) for all transactions conducted.

We must not:

- Give or offer anything of value, including a facilitation payment, to any employee or member of any organization, including a government official, for the purpose of influencing official action or securing an improper advantage.
- Immediately report any payments demanded under circumstances where safety is at risk (payments made under duress will not result in disciplinary action)

Relevant Policies and Guidance:

- Anti-Fraud and Anti-Corruption Policy
- Field Procurement Policy and Procedures
- Prosper Global Anti-Fraud and Anti-Corruption Policy: Engagement of Intermediaries: Guidance

Answering your Ethics Questions: Corruption

I was placing an order with an established supplier. My key contact at the supplier indicated that I would receive a large discount on the price if I could "do him a favor" by helping with the costs of educating one of his children. Am I allowed to do this favor?

No. This is bribery. You should report the supplier's request to the Integrity Hotline. Agreeing to this favor is prohibited by our Anti-Fraud and Anti-Corruption Policy.

Our team has been waiting a long time for visas for new team members. There has been a significant delay in visa processing in our country. A team member suggests that we can make a small payment to a government official who will speed up the visa processing for us. The team member said all the NGOs make these types of payments. Can we make this payment?

No. This is a facilitation payment and a bribe. Facilitation payments are prohibited by our Anti-Fraud and Anti- Corruption Policy, even if such payments are perceived as a common part of local practice. The suggestion to make such a payment should be reported to the Integrity Hotline.

A company with which Prosper Global does business delivers a holiday gift basket with food and wine to my office as a holiday gift. The basket has a value of approximately USD 100. I did not return the gift but shared it with other team members in the office. Is this okay?

Yes. This is a customary business courtesy and returning it may not be appropriate (e.g., perishable items) or cause embarrassment to Prosper Global. However, receipt of the gift basket should be reported to the ECD via the reporting form linked in the Anti-Fraud and Anti-Corruption Policy.

Senior team members in a country program interact freely with program partners and receive free meals from the partners. The program participants who are supported by these partners view this treatment as a bribe so the partner will receive more work from Prosper Global. Is it appropriate for the team members to receive these free meals?

In most circumstances, modest and infrequent business meals may be accepted. However, whenever a team member receives a free meal from a partner, vendor, etc., the team member must consider the specific circumstances and whether their impartiality could be compromised or appear to others to be compromised.

Do team members have to report having coffee or lunch with a friend who works for a vendor?

It depends. If the team member and friend are having coffee or lunch because they are friends and they both pay their share, then no reporting is necessary. Team members should consider the frequency of the outings, the cost involved, and whether the friend is paying to gain an improper advantage or influence official actions. Additionally, all gifts are prohibited during procurement processes.

Our team wants to engage an external consultant to ensure we get the required licenses from the local authority without delay. The consultant has a reputation for knowing the relevant processes very well. Can we contract this external consultant?

Prior to engaging the consultant, team members must ensure that the external consultant will follow all legal requirements to obtain the license and follow the process outlined in the Anti-Fraud and Anti-Corruption Policy: Guidance for the Engagement of Intermediaries which includes the required anti-corruption due diligence process and contract provisions.

Conflicts of Interest

In order to protect the integrity of and promote continued public trust and confidence in Prosper Global, we must be particularly attentive to conflicts of interest. A conflict of interest exists when our loyalties are divided between Prosper Global's interests and those of another, such as a vendor, supplier, contractor or another employer. A conflict of interest also exists when our personal interests (including the interests of our family, relatives, friends, and household members) improperly influence how we carry out our job responsibilities and we do not act on the basis of what is in the best interest of Prosper Global. A conflict of interest can arise even if we are convinced that our decisions will not be affected by our outside relationship. Even the appearance of a conflict can tarnish Prosper Global's reputation – as well as our own. Many potential conflicts can be prevented or remedied by making full disclosure to those identified in the Conflicts of Interest Policy at the earliest opportunity and getting advice and approval.

We must:

- As a Prosper Global team member, act in the best interest of the organization.
- Avoid situations where a personal relationship (e.g., hiring of relatives) or a financial interest in another entity (e.g., entities supplying goods, equipment, or contractual services to Prosper Global), might influence how we make decisions in our jobs.
- Disclose all personal or financial interests that might reasonably be perceived as affecting our judgment to perform our roles at Prosper Global or that may create the appearance of impropriety and seek advice for how to appropriately handle them.

We must not:

- Conceal any information regarding potential conflicts of interest.
- Participate in hiring or employment decisions that involve family members.
- Use our position at Prosper Global for personal advantage or to benefit relatives or close associates.

Relevant Policies and Guidance:

- Conflict of Interest Policy
- Headquarters Finance Manual
- Field Procurement Policy and Procedures (PF3)
- Subaward Financial Management Policy
- Guide to Understanding Prosper Global's Conflict of Interest Policy

Answering your Ethics Questions: Conflicts of Interest

Does the Conflict of Interest Policy apply only to immediate family members?

***No**. A family member is anyone who resides with the team member, as well as parents, siblings, spouses, domestic partners, and children. Other family members and close friends are also included if the team member can personally benefit from a transaction with the family member or friend.*

Can the Conflict of Interest Policy be applied to the country team in their treatment of participants?

***Yes**. The Conflict of Interest Policy is applicable to all Prosper Global team members and should be followed when working with participants. For example, a team member should disclose if their relative is a participant. This situation may create a conflict.*

When Prosper Global enters an agreement with a partner that will be hiring subcontractors, agents, etc., what can Prosper Global do to ensure its Conflict of Interest Policy is followed and mitigate the risk that the partner will hire relatives or friends?

The agreement with the partner should contain a provision requiring the partner to adhere to Prosper Global's policies and make it clear that any violation of the policies may be considered a breach of the agreement. Partner staff members responsible for hiring subcontractors, agents, etc. must sign a conflict of interest disclosure statement.

I have been offered a consultancy. Can I accept it?

Not without prior approval from Prosper Global. Other employment is prohibited without authorization. You must submit a written request to your supervisor for permission to accept the offer. The request will be reviewed by senior management, who may grant written permission for the consultancy. This written permission must be obtained prior to accepting the offer.

My cousin works for a vendor that we're evaluating to provide services to Prosper Global. I work for the team in charge of selecting the vendor. What should I do?

Disclose this information to your supervisor as soon as you know your cousin's employer has submitted a bid. This situation may create a conflict. Even if you do not believe that you will benefit personally because of your cousin's bid, there may be an appearance of a conflict or a conflict may arise in the future.

I am a team member for a particular program, and my sister wishes to apply for a position in another program. Do I have to disclose this before or after the recruitment process?

You should disclose it prior to the recruitment process. Prosper Global will not employ relatives or friends where one will supervise, appoint, remove or discipline the other; where one will evaluate the work of the other; or where the working relationship will create a conflict of interest or an appearance of favoritism. In order to ensure none of these situations exist, you must disclose that your sister is applying. You also must not give an unfair advantage to or share confidential information with your sister when she is applying.

We have been working with a local org for years on various programs and have gotten to know the team and leadership very well. We know and trust them and therefore they are our 'partner of choice' for any program in that area. Is there any issue with this?

Building strong working relationships with partner organizations often benefits the implementation of collaborative programs, including where Prosper Global and partners are able to co-create programs from the outset. However, it is also important to be fair to other organizations and to avoid perceptions of 'favoritism' or conflicts of interest where possible. Prosper Global encourages, but does not require, that subrecipients be selected in an open and transparent manner (see Subaward Financial Management Policy section 8.1 for more information on Prosper Global's requirements when selecting a subrecipient), except when a specific selection process is required by the donor or the terms of the prime award.

Fraud

At Prosper Global, we prohibit all types of fraud. Fraud is any wrongdoing that involves deception and misrepresentation, either to benefit one's self or Prosper Global or to injure Prosper Global. Fraud is: (1) any attempt to gain funds, information, or other assets by deception or illegal means, or (2) the deliberate false entry or omission of material facts in order to misrepresent the truth. Fraud includes, among other things, embezzlement, theft, false statements, forgery, impersonation, diversion of resources, fraudulent accounting, and procurement fraud.

We must:

- Follow all Prosper Global procurement policies and procedures to ensure fair and unbiased procurement processes.
- Ensure time sheets and other financial records are accurate and complete.
- Ensure that business expenses are recorded accurately for reimbursement. Team members who are not sure whether a certain expense is authorized for reimbursement should ask their manager.
- Take extra time to review items that don't seem accurate.
- Review expenses submitted by team members before approving to ensure they are accurate.
- Monitor expense reports, vendor payments, payroll figures and budget variances for unusual activity.

We must not:

- Falsify time and attendance, expenses, purchase orders or other financial/employment reports.
- Approve a transaction without verifying the facts and completeness of the information.
- Provide false, misleading, or incomplete information when interacting with donors, the media, auditors, government agencies or investigators.

Relevant Policies and Guidance:

- Field Procurement Policy and Procedures (FP3)
- Anti-Fraud and Anti-Corruption Policy

Answering your Ethics Questions: Fraud

Our team received a notice of an upcoming internal audit. When compiling documentation for the audit team, I realized that we were missing some of the requested records – the prohibited party screening results from the RPS On-Demand system. I know that these screenings are required by Prosper Global before engaging in a financial transaction with a third party. I advised my supervisor of the missing results and was directed to run the searches and backdate the results. When I ran the searches, the third parties were not prohibited. Is it okay to backdate the results?

No. Backdating these results is forgery. You should report to the Integrity Hotline the direction given by your supervisor to backdate the results.

I made a small error on the expense report I just submitted – the amount I input is slightly more than the actual cost. Do I need to correct the report?

Yes. All records must be accurately kept. Even small discrepancies are a red flag for auditors and regulators.

We have hired consultants who have submitted a draft of a mid-term evaluation of one of our programs. The evaluation findings show that the program did not perform well. Although we agree the report is accurate, it makes us look bad. Can we terminate the consultants and replace them with a company that will give us a better mid-term evaluation?

No. This is unethical. Prosper Global commits to being transparent with donors about the success of its programs, and the challenges they face. This may be an opportunity to present the lessons from the mid-term evaluation and any resulting program adaptations.

I know certain costs, like alcohol or entertainment, are unallowable on grants. Can I code them under a general, non-specific category so it will not stand out on the financial report?

No. You may not misclassify an expense so that it can be paid from a remaining budget line or charge any unallowable cost to any budget line item. Unallowable costs incurred by the office should be charged to unrestricted funds only.

My team did not utilize all the budget approved this year. To maintain the same funding amount next year is it acceptable for me to ask a vendor to pre-bill Prosper Global for one of next year's projects?

No. This would qualify as falsifying expenses recorded in our books and records, misrepresenting when the organization would incur the expense. The law requires us to maintain accurate books and records.

We have money in our budget available for personnel on a donor funded grant. Can I therefore record my time on that grant/cost center for this month's timesheet (Personnel Activity Report) instead of the grant I have actually been working on?

No. You must record time on the basis of actual time spent on a grant and not based on budgeted time or available budget.

Preventing Support for and Transactions with Prohibited Parties

Prosper Global is committed to ensuring that we do not partner with, transact, or otherwise support individuals and organizations that we should not be doing business with. Prosper Global's policies and procedures are designed to prevent diversion of resources to and/or support for combatants or terrorist organizations, money laundering, or transactions with entities that are otherwise sanctioned, suspended, debarred or prohibited through applicable laws and regulations of our donors and headquarter countries including the US, UK, EU, the Netherlands, as well as the United Nations.

We must:

- Carry out risk-based due diligence on partners to understand any relationship with Prohibited Parties.
- Know, understand, and follow Prosper Global list- checking and other procedures in place to mitigate the risk of engaging in transactions with a Prohibited Party.
- Report any suspected violations and seek guidance where team members are not sure what constitutes support to a Prohibited Party.

We must not:

- Knowingly or intentionally provide material support for, or transact with, any Prohibited Party.
    - Material support includes but is not limited to: provision of aid, training, resources, or information to, at the direction of, or for the benefit of, a Prohibited Party.
- Publicly express, whether in public forums or on social media or any other forum, personal or professional support for any Prohibited Party.
- Accept, directly or indirectly, funding or in-kind contributions from Prohibited Parties.

Relevant Policies and Guidance:

- Preventing Support for and Transactions with Prohibited Parties Policy
- Ineligibility and Compliance Checking Policy and Procedures

Answering your Ethics Questions: Preventing Support for and Transactions with Prohibited Parties

I am recruiting for a consultant for a temporary program position in an area where a sanctioned group operates and has some community support. One of the candidates is highly qualified and was successfully screened through Prosper Global's Human Resources and the Ineligibility and Compliance Checking (ICC) process. In doing further due diligence, however, I see that the candidate has expressed support for the sanctioned group on their social media platform on many occasions. Is it acceptable to select this consultant?

No. Public expressions of support for a Prohibited Party such as the sanctioned group in question violate the Prohibited Parties Policy.

We selected a contractor several months ago after a full due diligence process including complete and accurate ICC checks. We have just now learned that the contractor pays an "access fee" to a sanctioned group in the area, in violation of Prosper Global's Prohibited Parties Policy. Can we continue to work with this contractor?

No. Although the contractor may have been fully vetted in the past, Prosper Global cannot work with a partner organization that is violating our policies and sanctions regulations. Prosper Global should immediately cease working with the contractor and report any transactions, including payments for services, that occurred in violation of the Prohibited Parties Policy.

We are running a humanitarian program in a part of a country that recently came under control of a group that has been designated a "terrorist organization" by the US and UK governments. Can we negotiate with the group to understand if our humanitarian programming can continue?

Yes. After suspending operations and ensuring the safety and security of all Prosper Global staff, Prosper Global may meet with and negotiate access with the group. This should be done in careful coordination with country and regional management, Security, Legal, and other relevant headquarters departments to ensure that nothing of value, such as permit fees, taxes or reputational benefit etc., is provided to the sanctioned group.

After having received permission to resume programming in a country that recently came under control of a designated terrorist organization, a representative of that organization insisted that Prosper Global and other NGOs operating in the area provide a list of participants and "approved vendors". Can Prosper Global comply?

No. Allowing a sanctioned group to control aid or interfere with independent procurement processes could constitute providing the group material support in violation of the Prohibited Parties Policy and laws/requirements of our headquarters offices.

A small NGO that Prosper Global was considering collaborating with was recently debarred for bribery by a government donor in a Prosper Global headquarters country. Is this NGO considered a prohibited party under Prosper Global's policy?

Yes. Because the NGO was suspended by a donor government, it falls under the category of an "Excluded Entity," one of the categories of prohibited parties in Prosper Global's Prohibited Parties Policy. Prosper Global should refrain from working with this organization. If the suspension is lifted, Prosper Global may re-engage with the organization after thoroughly documenting its due diligence.

Trafficking and Modern Slavery

Prosper Global is committed to a work environment, supply chain, and operations that are free from all forms of human trafficking, exploitation and modern slavery. Human trafficking, forced labor, and exploitation are wholly contrary to Prosper Global's mission. Prosper Global will not allow human trafficking or slavery in any part of our global organization, work, or with any of our partners.

We must:

- Adhere to local labor laws and contract provisions.
- Ensure that underrepresented groups of workers are never exploited in the course of any of our programs or projects, including migrants, women, refugees, children and other groups vulnerable to exploitation due to their immigration status, marital status, gender or gender reassignment, ethnicity, age, health status (including HIV status), disability, veteran status, or education levels.
- Only select suppliers that uphold basic social rights and working conditions based on international labor standards, and that do not engage in human trafficking or child labor.

We must not:

- Pay for sex or sexual favors or engage commercial sex workers, even where it is legal in a given context.
- Use forced labor in the performance of any contract (of whatever nature).
- Use any misleading or fraudulent recruiting practices, such as making material misrepresentations about working conditions or compensation or charge fees for recruitment.
- Conceal, confiscate or otherwise deny anyone access to their identity or immigration documents, such as passports, national identity cards, or drivers licenses.

Relevant Policies and Guidance:

- Anti-Trafficking Policy
- A Guide to Understanding Prosper Global's Anti-Trafficking Policy
- Field Procurement Policies and Procedures (FP3)

Answering your Ethics Questions: Trafficking and Modern Slavery

In my community paying for sex is common, legal, and considered a reasonable way for many people to make a living. How can Prosper Global expect our local team members to agree to this prohibition when it is so common and accepted here?

Paying for sex is exploitative and closely linked to human trafficking. If anyone wants to work on behalf of Prosper Global, they must agree to abide by this policy. Prosper Global has zero-tolerance for paying for commercial sex or exploitation of any kind.

If I have suspicions about possible human trafficking, should I investigate to make sure I know exactly what is happening before I report my concerns? I don't want someone to get into trouble if I'm wrong or waste my supervisor's time.

It is important to report your concerns immediately so that the facts of the situation can be determined quickly. Remember, as a witness, your role is not to investigate, that will be done through an established process. There may be an innocent explanation for the concerns you have and if so, no one will be in trouble, and you will definitely not be wasting anyone's time.

My neighbor asked me to allow children to stay in a room that is attached to my home in exchange for money. He says it will be a new group every month. They appear to be from another country, but I would not be doing anything wrong because they are just staying at my house. Is that correct?

The situation described sounds suspicious and could involve the trafficking of persons. This would not be acceptable behavior for a Prosper Global team member. When children (under 18) are trafficked, no violence or coercion needs to be involved. Simply bringing them into exploitative conditions (harboring them) constitutes trafficking. You need to report this situation immediately to Prosper Global.

I've noticed that a team member has a domestic servant who appears very young and seems to come from another country. The young person does not go to school or leave the house. I'm concerned about the situation, what should I do?

If you have concerns, report them to the Integrity Hotline. Prosper Global team members are prohibited from any engagement or complicity in the recruitment, transportation, harboring or receipt of someone under the age of 18 for labor or other purposes.

A friend of mine who works for another aid organization told me a contractor approached him and said he would pay him $50 (US) per person if he would drive a truck full of boys into another country. My friend said no but does not know what to do. We are thinking about confronting the contractor to tell him he is trafficking boys. What should we do?

This is definitely suspicious activity on the part of the contractor but you and your friend should not confront him. Report this situation to the Integrity Hotline, Human Resources or a trusted leader and advise your friend to do the same with his organization. The Ethics and Compliance Department will follow up with this situation and ensure there is a proper investigation.

Child Safeguarding

At Prosper Global, we believe all children (defined as anyone under the age of 18), regardless of their or their parents' age, sex, gender, sexual orientation, race, religion, social and economic conditions, political or other opinions, national or social origin, property, birth, or other status have a right to be protected from all forms of harm, abuse, neglect, and exploitation. We have a special obligation to ensure the safety and dignity of all children we encounter through our work. Prosper Global will not tolerate the abuse or exploitation of children in any form.

We must:

- Treat all children, at all times and in all places, with respect and dignity; always act in the best interests of their physical and emotional well-being; and never engage in conduct that is or could be perceived as abusive, exploitative or harmful.
- Constantly look out for the best interests of the children with whom we engage in our work, to identify and minimize risks of harm, abuse, or exploitation by others. Immediately report any suspicions of exploitation or abuse of children to the Integrity Hotline or other reporting avenue.
- Only obtain and use images, videos, and interviews with children after understanding their potential impact on the safety, dignity, privacy, and wellbeing of the child and obtaining informed consent from their parents, and the children themselves if over 14 years of age, always ensuring that children are not identifiable, particularly by using their last name or combining their name, image and location.

We must not:

- Engage in any behavior that constitutes physical abuse, emotional ill-treatment, sexual abuse, attempted abuse, or neglect of any child at any time, during or outside of work.
- Engage in any sexual activity with anyone under the age of 18, no matter local laws or customs, or mistaken belief in their age.
- Take photos of children for use in Prosper Global materials, our own personal social media accounts, or any other purpose, without following the proper consent procedures.

Relevant Policies and Guidance:

- Child Safeguarding Policy
- A Guide to Understanding Prosper Global's Child Safeguarding Policy

Answering your Ethics Questions: Child Safeguarding

In my country, marriage with someone under the age of 18 is very common. What if I want to become engaged to someone who is 17? (I am only 20)

In many places where Prosper Global works, marriage under the age of 18 is legal and common. Despite this, you cannot work for Prosper Global and marry someone under the age of 18. The prohibition against sexual activity with children under the age of 18 is a standard across our sector.

I heard a team member yelling at a child who was misbehaving during a Prosper Global program activity. She did not touch the child. Is this a violation of our Child Safeguarding Policy?

Yes. This could be a violation of our Child Safeguarding Policy. Under our policy, child abuse may be physical, emotional, sexual, or involve neglect.

Can I take photos of a child or group of children in our program and use them to highlight our work, or post them to my Facebook page?

Only if you obtain appropriate consent first. You must have informed consent from every child's parent or guardian and from every child over the age of 14. To give consent, the parent and child must be informed of and understand what the images will be used for.

In my context it is common to lightly spank or slap the hand of a child when they misbehave or disobey. Is this ok in a Prosper Global program?

No, under our policies it is never ok to physically discipline or hit a child in any way. We must treat all children with respect and dignity and never engage in conduct that is or could be perceived to be abusive.

What does it mean to neglect a child under our policy?

Neglect under this policy refers to a persistent failure to meet a child's basic physical or psychological needs that could result in harm to a child physically, emotionally, or mentally. This could include a failure to supervise or protect a child from harm, or provide safe conditions for them.

One of the daily workers in my program is dating a girl in the community whom he believes is 18 years old. However, she attends high school and I think she may be 16 or 17. What should I do?

You should report this to the Integrity Hotline. Our policies apply to daily workers or anyone working on Prosper Global's behalf. If you have reasonable grounds to suspect someone is engaging in sexual activity with someone who may be under 18, that should be reported immediately. Mistakenly believing someone is over 18 does not make sexual activity with someone under 18 permissible.

Sexual Exploitation and Abuse

As humanitarians and aid workers, Prosper Global team members, and those with whom we partner, often hold a privileged position of power and trust relative to our participants and the communities that we come from and serve. We must ensure that we never use that privilege in a way that could cause harm. Any abuse or exploitation of children or adults by our team members, partners or other representatives directly contradicts the principles upon which our humanitarian work is based and can inflict life-long harm on those experiencing it. Prosper Global has zero-tolerance for exploitation and abuse and is committed to ensuring physical and psychological safety within our teams and our programs

We must:

- Treat everyone we encounter in the workplace, in programs, and in the community with respect, dignity, and professionalism.
- Ensure all sexual activity we engage in is consensual, with persons over the age of 18, and not based on or involving any perceived, or real imbalance of power.
- Disclose any relationship with anyone who could be considered a program participant to either a Human Resources lead, country director or Safeguarding focal point, as well as the Integrity Hotline. Relationships between team members and participants must never involve improper use of rank or position.
- Such relationships are permitted only in very limited circumstances outlined under our policies and then only if the relationship has been formally disclosed.
- Immediately report any suspicions of sexual exploitation or abuse involving Prosper Global team members, partners, or visitors.

We must not:

- Engage in any sexual activity with anyone under the age of 18, no matter local laws, customs or mistaken beliefs about age.
- Engage in any relationship that involves improper use of rank or position, including with Prosper Global partners.
- Ask anyone for anything in exchange for participation in our programs, or lead them to believe they will receive favorable treatment by giving something to us or doing something for us.
- Engage in any sexual or romantic activity with anyone who may be considered a participant that we do not first disclose, even if we feel certain there is no improper use of rank or position or imbalance of power, recognizing that such behaviors can undermine the integrity and credibility of Prosper Global's work.
- Offer or exchange money, work, offers of employment, goods, or services for sex or sexual favors. Paying a prostitute or commercial sex worker is not permitted even where allowed by law.
- Engage in any form of exploitative, humiliating, degrading, or harmful behavior.

Relevant Policies and Guidance:

- Prevention of Sexual Exploitation and Abuse of Program Participants & Community Members (PSEA) Policy
- A Guide to Understanding Prosper Global's Sexual Exploitation Policy

Answering your Ethics Questions: Sexual Exploitation and Abuse

As a Prosper Global team member am I allowed to date or marry a program participant who is in a different program than the one I work for?

Prosper Global prohibits any relationship between team members and participants that involves improper use of rank or position, meaning that the relationship is based on any sort of threat, promise, suggestion or expectation that the person may receive additional benefit in exchange for the relationship. As humanitarian aid workers, Prosper Global team members are in a position of relative power in communities and therefore we must take special care to ensure that this power is not used (explicitly or implicitly) to encourage people to have relationships or sex with us. We recognize that many of our team members come from the local communities where we work and that some relationships with participants may not involve improper use of rank or position. To ensure that is the case, any potential relationships between team members and anyone who could be considered a program participant must be disclosed to either the country director, in-country Safeguarding focal point or Human Resources lead, as well as the Integrity Hotline. The Ethics and Compliance Department will determine if there is any potential for abuse of rank, position, or any other conflict of interest. As a Prosper Global team member, you may be moved to a different program or part of the community to ensure there is no risk of

May I remain anonymous when making a report?

Yes. You may remain anonymous when making a report via the Integrity Hotline. However, when making an anonymous report, our investigators may have more difficulty finding information regarding the incident.

I have heard rumors that one of my colleagues is having a sexual relationship with an enumerator in our program. I have never seen anything suspicious, but several people in the community and on the team have commented on it. Should I report it even if I don't have direct information?

Yes, a relationship between a team member and enumerator may be a violation of our policies if the enumerator could be considered a program participant. Once you are aware of a potential concern, it is your responsibility to report it, even if you do not have direct information. Our team of trained ethics investigators will follow up and determine if there has been a violation. Because of the enormous harm caused by exploitation, it is critical that we address every potential issue. It is always okay to report in good faith, even if the report turns out to be unsubstantiated. Never attempt to investigate it yourself – this can compromise an investigation and put a survivor at risk.

There are many rumors in my community that there are employees of other humanitarian organizations who are sexually exploiting local women and girls. I have seen NGO workers entering bars where I know sex work is common. These people don't work for or partner with Prosper Global. Should I do or say anything?

Yes. You should report your concerns to the Integrity Hotline immediately. As Prosper Global team members, we are required to report allegations against employees of other humanitarian or aid organizations. We all have a duty to do everything we can to end sexual exploitation in our sector. The Ethics and Compliance Department will take steps to notify the other organization and/or investigate further.

Sexual Harassment

All Prosper Global team members have the right to a safe and respectful working environment free from any form of sexual harassment. Prosper Global has zero-tolerance for sexual harassment and is committed to ensuring physical and psychological safety within our teams and our programs.

We must:

- Treat each other with respect and communicate professionally in the workplace and at all work-related events.
- Ensure any romantic relationships in the workplace are entirely welcome, voluntary, and consensual; free from any form of coercion, exploitation, or abuse of power; and do not impact professional duties or the working environment.
- Immediately disclose any romantic relationship between a leader, supervisor or manager and anyone in a subordinate position. Relationships must be disclosed by both team members to the Human Resources department responsible for their employment as soon as possible.

We must not:

- Make comments about a person's body, relationships, sexuality, or make lewd statements or jokes of a sexual nature.
- Make sexual or romantic advances to anyone who is in a subordinate position.
- Make unwelcome, inappropriate, or repeated romantic or sexual advances to other team members or partners—verbally, physically, or in writing.
- Explicitly or implicitly suggest that an individual's reaction to such advances or comments may form a basis for any sort of employment decision or actions.
- Use any Prosper Global offices, vehicles or equipment, including computers, cell phones, office walls, email accounts, or internet access to view, display, or share any material that is sexual in nature or engage in sexual activity.

Relevant Policies and Guidance:

- Sexual Misconduct in the Workplace Policy
- A Guide to Understanding Prosper Global's Sexual Misconduct Policy

Answering your Ethics Questions: Sexual Harassment

I overheard some of my colleagues comment on other team members' bodies in a sexual way and make demeaning jokes about women. While they do not include me in these conversations, when I overhear them I feel uncomfortable. Is this a violation of our Safeguarding policies and should I do anything about it?

Yes. Making sexually offensive jokes or comments can make the work environment uncomfortable or hostile to others and is a form of sexual harassment. You should report it. If you feel comfortable, you may also speak up and remind people that such comments violate our Sexual Misconduct Policy.

Do Prosper Global policies allow team members to have romantic relationships with each other?

Romantic relationships between peers in the workplace are not strictly prohibited, however such relationships must be entirely welcome, without any form of coercion, exploitation or abuse of power, be voluntary and consensual, and not impact professional duties or the working environment. If there is an imbalance of power or a supervisory relationship between the parties, the relationship must be properly disclosed so that steps may be taken to ensure it is appropriate. If not disclosed, the relationship violates our policies.

I found sexually explicit content on a Prosper Global laptop. What should I do?

You should report it immediately. No Prosper Global property may be used for sexual activity or for viewing, recording, displaying, or disseminating sexual material.

My new supervisor pays special attention to me and often asks to spend time together outside of working hours, making hints that I will be considered for additional responsibilities based on our "special friendship." This makes me uncomfortable but I don't want to risk losing my job or getting a bad performance review. What should I do?

This sounds like a violation of our Sexual Misconduct Policy. Your supervisor is abusing their power and subjecting you to a form of sexual harassment known as "quid pro quo" by suggesting you will receive employment benefits based on your relationship with them. You should report this behavior. Prosper Global takes this conduct seriously and is committed to ensuring that no one is ever retaliated against for reporting misconduct. Your report will be confidential and handled by members of the Ethics and Compliance Department who are trained to investigate situations like this.

A senior female team member often comments on my body and makes sexual jokes around me. I feel uncomfortable about this, but don't want to say anything because I'm embarrassed to make a big deal out of it and not sure I will be believed because when people think of sexual misconduct, they usually mean something men do and women experience, right?

This behavior violates our Sexual Misconduct Policy. Sexual misconduct can be committed by someone of any gender or sexual orientation against someone of any gender or sexual orientation. Anytime someone makes you feel uncomfortable at work in a sexual way, you should report it. Our Safeguarding team takes all allegations seriously and works to support survivors of all types of sexual misconduct.

Supporting Survivors

Prosper Global is committed to survivors. Their safety, well-being, needs, and perspectives are at the core of our safeguarding prevention and response efforts. We are dedicated to ensuring we provide all survivors of child abuse, sexual harassment, exploitation, assault, or abuse with a safe, supportive, and confidential place to come forward, where their needs are the first priority. Insofar as possible, we will connect all survivors, be they our own team members or members of the communities where we work, with access to the survivor-supportive services they require, regardless of whether they wish to make a complaint or participate in an investigation.

We must:

- Make every effort to ensure the dignity, security, and well-being of survivors at all times.
- Treat anyone who reports abuse, harassment, or exploitation, with care, respect, and confidentiality.
- Connect survivors to medical, psycho-social and legal support in accordance with their wishes at any time following an incident of sexual harassment, exploitation, or abuse, independent of the outcome of an investigation.
- Provide appropriate support for survivors based on the guiding principles of do no harm, confidentiality, safety and non-discrimination.

We must not:

- Dismiss survivors without offering support and explaining our investigative process.
- Subject survivors to victim blaming or disrespect.
- Force or coerce survivors to participate in processes they do not want to participate in.

Relevant Policies and Guidance:

- Prevention of Sexual Exploitation and Abuse of Program Participants & Community Members (PSEA) Policy
- Sexual Misconduct in the Workplace Policy
- Ethics Complaint and Whistleblower Policy
- A Guide to Understanding Prosper Global's Whistleblower Policy

Answering your Ethics Questions: Supporting Survivors

What does a survivor-centered approach look like in practice? How does Prosper Global treat survivors?

A survivor-centered approach respects the dignity of the survivor and prioritizes their safety, privacy and well-being. This means we do what we can to ensure the safety of a survivor and immediately work to connect them with medical, psycho-social/emotional support, legal advice, or connections to law enforcement. All our investigators are trained in trauma-informed sexual exploitation and abuse investigations, and only specially trained investigators interview children. Our investigators understand the impact of trauma and how it affects survivor behavior and do everything they can to avoid additional traumatization, including limiting the number of times a survivor has to tell their story and ensuring they have the support they need to do so. Where criminal activity may have taken place with an adult survivor, we provide relevant information about the process, risks and benefits of reporting to law enforcement and assistance in doing so if a survivor wishes.

What if someone discloses abuse or exploitation to me? What should I do?

Above all, treat the person with respect and dignity. Do not question, blame, or shame them. It is not your role to find out if the report is "true" or not. Listen and empathize with the person. You can say, "I'm so sorry" or "that's terrible" or any other response that feels natural to you. If the allegation is about someone who works for or on behalf of Prosper Global, tell the person how to report it and that they can do so confidentially. Let them know that you will report it too, because you are obligated to do so, but that you will do so confidentially through the Integrity Hotline. Let them know that we have survivor support services we can refer them to and offer to connect them with your local Safeguarding champion or focal point. Do not ignore or fail to report the disclosure. Do NOT attempt to investigate it yourself. Do NOT argue with the person disclosing, minimize the disclosure, blame the person, or otherwise state or imply that the disclosure is untrue or invalid. These sorts of statements can cause additional shame and trauma. Examples of such negative statements include: "I'm sure they didn't mean it. You're being too sensitive. Why were you there at night alone? What were you thinking? Why didn't you do X? Why didn't you tell someone?"

Discrimination, Harassment, and Bullying

Prosper Global is committed to a work environment in which everyone is treated with respect and dignity and to maintaining a culture of caring to ensure the emotional and physical safety of our teams and anyone we work with. We strive for a diverse and inclusive working environment and expect that working relationships are free of bias, discrimination, harassment, and bullying

We must:

- Create a professional atmosphere that promotes equal employment opportunities and prohibits discriminatory practices and any form of unlawful harassment or bullying.
- Treat all colleagues with dignity and respect.
- Make employment decisions based on an individual's professional abilities and merits, not individual characteristics unrelated to the job.
- Provide reasonable accommodations for persons with different abilities or specific needs.

We must not:

- Take negative action toward someone because of their membership in or affiliation with a protected group, including: age, disability or medical history, ethnicity, national origin, race, caste or socioeconomic status, religion, gender, gender identity or gender reassignment status, family status, marital status (with the exception of child marriage) or pregnancy, and sexual orientation.
- Behave in a way that is perceived as demeaning and unacceptable by the recipient and which creates an intimidating, humiliating, or offensive environment.
- Abuse or misuse the power and influence entrusted to us.
- Undermine, frighten, humiliate, denigrate, injure, or cause harm to those we interact with, be it team members, community participants, donors, vendors or sub-recipients in any way.

Relevant Policies and Guidance:

- Discrimination, Harassment & Bullying Policy
- A Guide to Understanding Prosper Global's Policy on Discrimination, Harassment & Bullying

Answering your Ethics Questions: Discrimination, Harassment, and Bullying

Upon completion of a competitive, internal recruitment, our two final candidates, one female and one male, were identified. The hiring manager stated that although they believe the female candidate would be the best choice, they are concerned that the female will not be able to represent the organization and program externally due to the fact that most external engagements are with males, therefore they offered the promotion to the male candidate. Is this permissible?

This sounds like a violation of our Discrimination, Harassment and Bullying Policy, as basing hiring decisions on gender is unacceptable. If there are concerns regarding a team member's safety during external engagements, Prosper Global has an obligation to ensure the physical and psychological safety of all team members.

While traveling to a remote program site, two colleagues were complaining about the costs associated with providing a blind team member with accommodations. During this conversation the colleagues were referring to the team member and their disability in a derogatory manner. Should this be reported?

Prosper Global is committed to creating an inclusive workplace that values all team members with disabilities for their strengths. Prosper Global provides team members with disabilities, whether visible or invisible, an equal opportunity to succeed, learn and advance within the organization. The behavior exhibited by these two colleagues is defined as harassment which involves unwanted conduct that affects the dignity of individuals in the workplace, and should be reported.

During a team meeting, our manager openly criticized a team member and their work productivity over the last three months. The ongoing criticism and threat of termination of the team member lasted the majority of the meeting and left many of us feeling uncomfortable. What should I do in this situation??

Although it is important for leaders to provide team members with feedback regarding their performance, both strengths and areas for improvement, it is critical that this be done in a confidential setting and through ongoing and regular check-ins between the team member and manager. Providing feedback or engaging in conduct that is perceived as demeaning and unacceptable by the recipient and which creates an intimidating, humiliating or offensive environment, violates Prosper Global's Discrimination, Harassment and Bullying Policy. This type of behavior should be reported.

Duty of Care, Including Safety and Security

Prosper Global cares deeply about the physical, psychological, and emotional well-being of our team members, partners, partnering communities, and visitors. Through our commitment to duty of care and to the extent reasonably possible, we will ensure the safety, security, and well-being of all individuals we come into contact with through our work, whether team members, partners, community members, program participants, or others. Likewise, we expect team members, visitors and partners to ensure that their actions do not create undue risk of harm to themselves or others.

We must:

- Make every effort to mitigate risks and prepare ourselves for the safety and security risks and environments we will encounter as we perform our critical work.
- Take individual responsibility to be knowledgeable of the context and our rules.
- Recognize that we are responsible for the impact of our behavior on social media, and for our personal security as well as the security of the broader team.
- Fulfill our agency and individual commitment to the International Federation of the Red Cross Code of Conduct and accompanying core humanitarian principles, which emphasizes both the primacy of the humanitarian imperative and that aid must be delivered on the basis of need.
- Continually remain aware of safety and security concerns, follow local security protocols, and stop any work that becomes unsafe.

We must not:

- Behave in way that violates our global and country safety policies and protocols.
- Allow our actions to compromise the trust and confidence the community has placed in Prosper Global and our programming.
- Work while impaired by alcohol or illegal substances.
- Transfer significant security or operational risks to partners, without identifying effective approaches to risk sharing and management that are appropriate for the partner and the context.

Relevant Policies and Guidance:

- Global Safety and Security Policy
- Global Safety and Security Minimum Standards
- Preventing Support for and Transactions with Prohibited Parties Policy

Answering your Ethics Questions: Duty of Care, Including Safety and Security

Can an individual team member choose not to be covered by Prosper Global security policies and manage their own risks?

No. There is no opting out of our security framework once employed by Prosper Global.

Do security policies apply to both international staff and local team members?

Yes. Prosper Global security policies apply to all team members.

A Prohibited Party is the dominant force and administrative entity in charge of governance and security in my area. In this case, is it acceptable to accept their protection and pay standard service fees for protection?

No. This is a violation of the Prohibited Parties Policy and a significant legal risk to Prosper Global. This does not mean we cannot find a way to carry out activities, but it requires careful oversight with a legal review. We must find other ways of establishing the safety of the team.

I understand that Prosper Global has zero tolerance for bribery and corruption. However, where I have to pay a bribe to secure my safety or safe passage, is it permissible? In such circumstances, what can I do to ensure I am safe and still operating within Prosper Global's policy provisions?

You are likely allowed to make this payment, which is considered a facilitation payment made under duress. Although Prosper Global prohibits facilitation payments, one exception is if the payment is made under duress. This means a reasonable person would believe that they have no alternative other than to provide the payment in order to protect life, limb, or liberty. If a facilitation payment is made in these circumstances, you must report the payment immediately to the Ethics and Compliance Department or a supervisor, who must report it to the Ethics and Compliance Department.

As part of our risk mitigation strategy in a high-risk operational context, can we subgrant activities to partners if they are willing to take on the risks, (for example – safety and security risks, programmatic and delivery risks, financial and compliance risks) rather than us?

We cannot simply transfer the risk to a partner organization. We must carefully consider the risks to anyone working on our behalf. It might be assessed that the risk to the partner is lower than to us in a given context. We may support addressing this risk by implementing appropriate financial, operational, and technical support, as may be relevant for the program.

Responsible Use of Prosper Global Resources

Prosper Global resources, whether a physical asset, like a vehicle, or intellectual property, such as our trademark, are intended to support team members in achieving Prosper Global's mission. Misuse of Prosper Global resources, including business sensitive and proprietary information, employee time, financial resources, equipment, and supplies, adversely affects the operational and financial performance of Prosper Global programs and can harm the organization and our reputation. We have a responsibility to all of our donors and stakeholders to use our resources efficiently and effectively.

We must:

- Respect and protect Prosper Global resources to ensure that they are not lost, damaged, or misused.
- Use Prosper Global resources responsibly and lawfully and secure them from theft, fraud, waste, abuse or harm (without endangering ourself or others).
- Safeguard our intellectual property and confidential information and ensure we do not infringe upon the same rights of others.

We must not:

- Use Prosper Global resources (email, telephone or internet), in excess for personal reasons. Usage at any level cannot incur any unreasonable costs or interfere with job responsibilities.
- Inappropriately use computer systems and Prosper Global email accounts or install unauthorized IT hardware or software.
- Disclose or use proprietary or business-sensitive information of Prosper Global or others outside our scope of employment with Prosper Global, or without Prosper Global's prior authorization.

Relevant Policies and Guidance:

- Information Security Awareness and Communications Acceptable Use Policy
- Employee Handbook for US Assigned Staff
- Expat Team handbook, Section 1.5

Answering your Ethics Questions: Responsible Use of Prosper Global Resources

I am attending a professional certification program outside of working hours and need to submit a 3-page paper before attending my course but my home laptop is broken. Is it okay to use Prosper Global's computer?

While the purpose of internal communication systems is to conduct Prosper Global business, you may use your Prosper Global laptop for personal documents so long as this is kept to a minimum, is reasonable, does not interfere with your job responsibilities, and is done during non-working hours. Team members are responsible for exercising good judgment regarding the reasonableness of personal use, including not accessing websites that would violate Prosper Global policies. If there is any uncertainty, you should consult your supervisor or manager.

I have been solicited for a part-time consulting opportunity by the ministry of health with which Prosper Global coordinates its activities within our country's operations. The work is related to Prosper Global's programming, my expertise is aligned, and I can do the work outside of my Prosper Global working hours. May I take the consultancy?

No. Although there are circumstances where prior permission for additional employment outside of Prosper Global may be obtained, such as where normal duties will not be impaired etc., Prosper Global does not permit employees to work with host governments. This situation could also be considered a conflict of interest.

My Prosper Global colleague is unable to access the Prosper Global system because they forgot their Prosper Global password but needs to access the system to submit a proposal. May I share my password for temporary use?

No. All Prosper Global team members are required to keep passwords secure and are not allowed to share accounts. Authorized users are responsible for the security of their passwords and accounts and passwords should be changed every 90 days.

Can I use Prosper Global vehicles for personal use?

It depends. Prosper Global vehicles are to be used for programmatic and operational purposes only. However, certain offices may allow use of the vehicles for limited personal use. You should consult your office's Vehicle Use Policy and supervisor before using a Prosper Global vehicle for personal use.

There is some discarded computer equipment at the Prosper Global office. Some of the items may be valuable on the resale market. Can a team member volunteer to clean up the area, sell the valuable parts, and keep the proceeds?

No. Asset disposition must follow established guidelines. If the items have any resale value, Prosper Global (or the donor depending on donor regulations)– not individual team members – will receive the benefits. If the items do not have any resale value, but are donatable, the team must follow established guidelines for such donations.

How do I know if something contains "proprietary" or "business-sensitive information" that can't be disclosed??

Whether something is proprietary or business sensitive is often determined on a case-by-case basis. Assume all Prosper Global information is proprietary or business sensitive. If you are unsure about any particular document, seek guidance from your manager or the Legal Department before making any disclosures.

We have a new donor grant that includes a budget line for a new vehicle. We have another older model vehicle in good condition which is available from another closed program in that same location. However, we are planning to buy a new vehicle as it would be nice to have a newer model. Is this appropriate?

We must not be wasteful with resources and so we would encourage you to consider whether this vehicle is really needed for the implementation of the program (when another suitable vehicle is available) and if this is the best use of the donor resources which might otherwise be used for the implementation of the program. This question should also be considered in the context of the applicable donor compliance rules,

Political Activity and Lobbying

Consistent with the humanitarian principles of neutrality, impartiality, and independence, Prosper Global does not contribute to political parties or politicians. Prosper Global respects its team members' right to participate as individuals in the political process so long as they are doing so in their individual capacity. Prosper Global may engage on issues of importance to its humanitarian and development mission and the countries where we work within the bounds of its Lobbying & Political Activities Policy.

We must:

- Only participate in personal political activities in our individual capacity, in no way affiliated with Prosper Global.
- Remain compliant with laws that govern political and lobbying activities of charitable organizations, including U.S. laws applicable to Prosper Global as a 501(c)(3) tax-exempt organization and the Scottish lobbying laws applicable to Prosper Global Europe.
- Seek guidance from our Advocacy team before engaging in any lobbying activities on behalf of Prosper Global.
- Keep accurate track of any expenditures, including the time of team members, that constitute lobbying.

We must not:

- Participate in any political campaign in support of, or in opposition to, any candidate for public office on behalf of Prosper Global or in Prosper Global's name (including while wearing Prosper Global branded items of clothing).
- Use Prosper Global funds or resources (including time, phones, paper, e-mail and other assets) to carry out or support our personal political activities.
- Use funds provided by our donors for prohibited lobbying or political activities.
- Affiliate with organizations that could interfere with our impartiality (or appearance of impartiality) in carrying out Prosper Global's work or that could harm Prosper Global's reputation.

Relevant Policies and Guidance:

- Prevention of Sexual Exploitation and Abuse of Program Participants & Community Members (PSEA) Policy
- Sexual Misconduct in the Workplace Policy
- Ethics Complaint and Whistleblower Policy
- A Guide to Understanding Prosper Global's Whistleblower Policy

Answering your Ethics Questions: Political Activity and Lobbying

There is a major election happening in my country and I am very supportive of one of the political parties. May I wear the political party's t-shirts, hats or campaign materials to the office to show my support? Is it okay to use Prosper Global's logo on political or campaign materials? Can I use my Prosper Global official email addresses to share personal political beliefs?

No. None of the above is consistent with Prosper Global's policy. While Prosper Global respects its team members' right to participate in the political process in their personal capacity, they should do so outside the workplace. Team members are not permitted to use Prosper Global materials to express their political views or use their affiliation with Prosper Global in support of a political campaign.

I am very engaged in my community and am considering running for political office in my city. On my campaign social media page and other campaign materials, may I mention the fact that I work for Prosper Global?

No. This is not appropriate since it could be seen as Prosper Global implicitly supporting your candidacy for public office.

Can I run for political office or support political campaigns and advocacy efforts in my individual capacity while working for Prosper Global?

Yes. Prosper Global respects its team members' right to participate in the political process in their personal capacity on their own time and not during working hours or using Prosper Global resources. If you are running for office, you should inform your supervisor and seek guidance to ensure no unintended affiliation with Prosper Global.

Responsible Use of Social Media

In our internal and external communications we must take care to exhibit the standards and principles that are integral to Prosper Global's success. Whether participating in our capacity as an authorized social media spokesperson for Prosper Global or in our personal capacity, we must do so responsibly and in a manner that minimizes reputational and other harm to Prosper Global and the people and communities with which we work.

We must:

- Follow our Social Media Community Guidelines for interacting on social media sites for business and personal use.
- Ensure that our activities are consistent with the standards contained in our policies when identifying ourself as a member of Prosper Global on social media.
- Treat people with respect and courtesy at all times, including when using social media.
- Ensure that our communications do no harm to the people and communities with which we work or put anyone, especially vulnerable populations, at risk of abuse or exploitation.
- Ensure there is no confusion between our opinions or personal interests and those of Prosper Global.
- Keep in mind that nothing is "secret" or "private" on the internet and that information that is published online may be made public – even long after it is posted.
- When representing Prosper Global, ensure we are remaining neutral and impartial and avoid making statements that can be viewed as political or ideologically biased.

We must not:

- Without prior authorization from the Global Media Team to speak on Prosper Global's behalf, suggest in any social media activity that we are authorized to speak on Prosper Global's behalf or that Prosper Global has reviewed and approved the content of our posting.
- Deliberately provoke community members in the form of intentional trolling, troll baiting, or flaming.
- Post messages that reasonably could be viewed as discriminatory, defamatory, malicious, obscene, threatening, intimidating, or that might constitute threats of violence, harassment or bullying.
- Post messages that infringe on copyrights, trademarks or other intellectual property.
- Post messages that are misleading or false; as a humanitarian organization we do not support spreading misinformation.
- Post information that is considered confidential, proprietary, or business sensitive.
- Use a Prosper Global laptop or computer for personal use of social media or personal blogging of online content.
- Post identifiable images of participants or community members without their consent, which includes appropriate consent from caregivers or parents for images of children.

Relevant Policies and Guidance:

- Prosper Global Media Protocol
- Social Media Community Guidelines
- Prosper Global Field Security Manual section 3.6
- Expatriate Team Handbook section 2.3.4

Answering your Ethics Questions: Responsible Use of Social Media

Can I use my personal account (Twitter, Facebook, or other media platform) to talk about Prosper Global work?

Work-related social media activity is not prohibited but must be authorized in advance to ensure consistent messaging about Prosper Global. You should check first with your supervisor or the Global Media Team before saying anything on a social media platform that suggests you speak on behalf of the agency.

I see someone has posted misinformation or offensive content about Prosper Global or a team member. Can I post a reply to rebut those statements?

No, you should not engage in any social media activity that could be viewed as provocative, offensive, or aggressive – even with the best intentions to correct misinformation. You should report the matter to your manager or the Global Media Team who will determine how best to address the matter.

We want to show the donor that our program was impactful, so we are thinking of making up some 'success stories' and using photos from another program to back the stories up. The donor won't know since it's the same type of activity so it shouldn't be an issue. Is this okay?

No. It is unethical and inappropriate to misrepresent the impact of a program or make up "success stories" and present them to a donor.

I like to take photographs when I am in the field working on a Prosper Global project. May I post these on Facebook? Workplace?

Prosper Global has established guidelines on how we use photos to promote our work that ensures subjects are treated with respect and that images posted elevate the positive outcomes of our programs. The guidelines can be found in our Media Protocol.

If I receive a phone call or inquiry from a social media platform representative or media representative, may I speak to them on behalf of Prosper Global?

No. If you are ever contacted by any type of media, all inquiries should be forwarded to the communications team at social@prosperglobal.org.

Privacy and Data Protection

Prosper Global is committed to survivors. Their safety, well-being, needs, and perspectives are at the core of our safeguarding prevention and response efforts. We are dedicated to ensuring we provide all survivors of child abuse, sexual harassment, exploitation, assault, or abuse with a safe, supportive, and confidential place to come forward, where their needs are the first priority. Insofar as possible, we will connect all survivors, be they our own team members or members of the communities where we work, with access to the survivor-supportive services they require, regardless of whether they wish to make a complaint or participate in an investigation.

We must:

- Make every effort to ensure the dignity, security, and well-being of survivors at all times.
- Treat anyone who reports abuse, harassment, or exploitation, with care, respect, and confidentiality.
- Connect survivors to medical, psycho-social and legal support in accordance with their wishes at any time following an incident of sexual harassment, exploitation, or abuse, independent of the outcome of an investigation.
- Provide appropriate support for survivors based on the guiding principles of do no harm, confidentiality, safety and non-discrimination.

We must not:

- Dismiss survivors without offering support and explaining our investigative process.
- Subject survivors to victim blaming or disrespect.
- Force or coerce survivors to participate in processes they do not want to participate in.

Relevant Policies and Guidance:

- Prevention of Sexual Exploitation and Abuse of Program Participants & Community Members (PSEA) Policy
- Sexual Misconduct in the Workplace Policy
- Ethics Complaint and Whistleblower Policy
- A Guide to Understanding Prosper Global's Whistleblower Policy

Answering your Ethics Questions: Privacy and Data Protection

Can I use my personal computer for work?

Prosper Global provides all team members with work computers or other devices that include important security features used to protect data about our colleagues and program participants. Using a personal computer is discouraged and there is no expectation that any team member would be expected to use their own device for work. However, personal computers or other devices for work purposes may be allowed, subject to certain restrictions and obligations outlined in the Prosper Global Bring Your Own Device Policy.

I have taken over a program that will be closing soon. In looking through program files, I found surveys that include participants' religious preferences, which could be useful in an upcoming program. Are there any problems with this?

Yes. Those surveys were created for a specific purpose, and may only be used for that purpose unless all participants are contacted again, and give their consent for the new use of their data. Additional consent is often difficult or impossible to secure. Also, religion is considered sensitive data, since it can be used to discriminate against others. Prosper Global should limit the use of sensitive data whenever possible, due to this increased risk. The only way to re-use the survey data is if it is anonymized: all personal and sensitive data are redacted or otherwise rendered anonymous, in such a way that the participant is no longer identifiable.

The program I support is planning to use a new vendor's data collection tool, one that has never been used at Prosper Global. The program manager has "heard good things" about the tool's security, but hasn't asked the vendor for proof. Can we go ahead and collect participants' personal data through this new tool?

No. You need to speak with the program manager about completing a Privacy Impact Assessment (PIA) for the new tool as soon as possible. PIAs help teams identify and address any security and privacy risks associated with personal data-related activity, whether it is for a new technology, policy or program. As you complete the PIA you may find that there are little to no risks, and work can proceed. However, if the PIA process uncovers high or unnecessary risks for the new tool, you may be forced to choose a different technology for data collection. You also need to make sure to have the participants' informed consent for collecting and processing their personal data in this way.

I have been asked to share the employee file of a colleague working on a specific project with the program donor. Can I do this?

Possibly. In accordance with the ethical principles outlined, the only data you can share must be relevant to the request, and limited to what is necessary. Before sharing any personal information with a donor (or any third party), it will be essential to understand the purpose of sharing and what the donor intends to do with the data. Any data which is not relevant must be removed prior to sharing. In the example above, when the donor is asked for more detail it is revealed that they require a CV and employment dates for compliance purposes. In this instance, we could share the relevant information (CV and employment dates) but would not share any other information such as performance reviews or absence records. In all instances, you should discuss the request with your supervisor.

Environment, Natural Resources and Climate

As a leading global humanitarian and development organization with a focus on climate change programming, Prosper Global understands that unsustainable patterns of natural resource use and environmental degradation pose a direct threat to our mission. We recognize our responsibility to be good stewards of the natural environments within which we work and to reduce and, whenever possible, eliminate the adverse local and global environmental impacts of our operations and programs. We also recognize our visible and influential position within the wider sector, and therefore seek to set a positive example and engage team members, partners, donors, and suppliers to encourage better use of natural resources and environmental practices whenever possible. Through individual and collective efforts to improve the ways in which we work, each and every team member must play their part in reducing the resources we consume and reducing our impact on the environment in the delivery of our operations.

We must:

- Comply with all applicable national and international legislation, regulations (including donor requirements), and codes of practice on environmental matters relevant to our operations in the context in which we work.
- Seek to mainstream environmental sustainability and climate change considerations in the design and implementation of our programs/projects in all contexts.
- In all procurement activities, follow Prosper Global's environmental principles: reduce, reuse, recycle, rethink, and seek to engage with suppliers that have environmental standards which are compatible with our own.
- Consider the full range of remote and virtual tools available when designing meetings, training, or other collaborative events and activities (internally and with partners), and only commit to travel for in-person events when necessary for success.
- Support team members who are promoting an environmentally friendly work culture, including greening initiatives in the office environment.

We must not:

- Travel unnecessarily for work purposes (especially by air), where a suitable and effective alternative exists. Note: this does not mean to reduce our ability to carry out visits to design, implement, and monitor programs and operations; rather that we are thoughtful as to the necessity and environmental impact of travel and seek out alternatives which minimize these impacts.
- Knowingly engage in program activities that directly create significant adverse impacts on natural resources or the environment.
- Engage in any program activities that do not meet national or international compliance requirements on environmental/climate change matters.

Relevant Policies and Guidance:

- Prosper Global Europe Environmental Policy
- Field Procurement Policy and Procedures (PF3): Section 3 Guiding Principles
- Prosper Global environmental policy (*forthcoming)

Answering your Ethics Questions: Environment, Natural Resources and Climate

I work in a headquarters support role and would really like to fly to one of the offices to see our activities being implemented. Can I do this?

It depends on the reason for travel, if it is necessary for work purposes and if a suitable alternative exists. We must be thoughtful about the need to travel for environmental reasons, as well as to carefully steward available funds.

I am running a training session which is usually carried out online; however, this time I would like to run it in person so the team can have a social event together afterwards. Is this acceptable?

Although we recognize that the social and human element of training sessions is important and enjoyable, we encourage team members to consider the environmental impact of travel for training, particularly where in-person training is not necessary for its success.

I am a project developer, and I am designing a project in one of our target countries. The Ministry of Environment in that country tells me that I don't need to undertake an Environmental and Social Impact Assessment (ESIA) under the country's laws. Should I take this as my only advice?

No. The decision as to whether an ESIA is required also depends on the requirements of the donor, and on Prosper Global's own environmental safeguarding procedure. Whichever system is more stringent determines the need for an ESIA.

Commitments to Communities Where We Work

Prosper Global believes that those impacted by the world's most complex challenges have a critical role in determining the solutions. Inclusive participation by our partner communities makes our programs fundamentally stronger. The Core Principles of our Code of Ethics—integrity, honesty, respect, and accountability— require us to center the perspectives of those most impacted within our partner communities. We uphold this commitment by:

- Centering the perspectives of community members in our global culture, operations, and programming.
- Seeking opportunities to shift power and decision making closer to the communities where we operate, as essential to our mission towards secure, productive, and just communities.
- Strengthening systems where our partner communities are the drivers of inclusion and resilience in the face of conflict and climate change.
- Following ethical standards in our storytelling, choosing our words and images with the dignity and respect that every individual deserves.

Together, these commitments—and our adherence to the Code of Conduct policies—ensures that Prosper Global is able to deliver innovative, quality and impactful programming in the places where we operate around the world.

Commitments to Partners

Prosper Global believes partnerships are critical in addressing the world's toughest challenges. The issues we address through our programs are complex and require many stakeholders to be part of the solution, particularly those who are most impacted. Every day, in almost every part of the world, we engage in partnerships—with civil society organizations, for-profit entities, social enterprises, donors, governments and other aid organizations. Local, national, and international partnerships form the foundation of our programs, and provide access, legitimacy, contextual and technical knowledge, and perspectives that are key to sustained impact. Only through effective partnerships—which support local ownership—can we hope to sustainably impact the complex systems and contexts where we work. Prosper Global aims to ensure that all engagement with partners is based on equity, a shared vision of common goals and objectives, and a mutually agreed upon path to meet these objectives. Prosper Global seeks clear, regular, open, and respectful two-way communication and feedback loops with all partners. Prosper Global seeks to work with partners to ensure that they have adequate resources, support, and capacity (programmatically and operationally) to fulfill their responsibilities and commitments.

Commitments to Donors

Prosper Global is deeply grateful to all our donors—individuals, organizations and institutions—that generously support our work. Prosper Global is committed to implementing programs in line with donor rules, regulations, and requirements. Prosper Global is also committed to the Core Principles of our Code of Ethics and thematic commitments outlined above. This includes aiming to ensure we are good stewards of the funds we receive, are fully accountable for funds received, and use resources efficiently and effectively. All Prosper Global team members play their part to deliver programs on time, on scope, on budget, and in line with relevant quality standards. Prosper Global commits to sharing data-driven and evidence-based inputs, where applicable, to back up our submissions and reporting to donors to demonstrate an ethical and efficient use of resources. Throughout our work, Prosper Global seeks to systematically and accurately use our monitoring, evaluation and learning systems to generate quality and accurate programmatic evidence. We seek to define, present, and measure success and what we have learned, and also be honest about the challenges we face in our programming and operations.

How to Raise Concerns

Reporting Misconduct

Prosper Global encourages a culture of openness where team members, partners, program participants, and community members can safely raise their concerns, ask questions and report unethical behavior. Operating ethically and with integrity is the highest priority for Prosper Global. All team members are required to report unethical behavior or violations of any Prosper Global policy. To ensure accessible and trusted reporting mechanisms, we have multiple methods available to report concerns or seek advice.

Our Integrity Hotline offers options to confidentially report ethics violations or seek advice in a secure manner. The Integrity Hotline web portal is available in multiple languages. On the web portal, you may submit your report anonymously. You can also email concerns or questions in any language directly to the Ethics and Compliance Department at integrityhotline@prosperglobal.org.

Our Community Accountability Reporting Mechanism (CARM) systems provide multiple channels for participants and community members to submit feedback, including concerns around ethical misconduct. Community feedback involving ethical matters will be escalated directly to the Ethics and Compliance Department.

If you're a Prosper Global team member, you may also report your concerns to your supervisor, a trusted leader, Human Resources lead, a Safeguarding or integrity focal point, Safeguarding champion, Ethics and Assurance Manager or CARM. They will ensure that your complaints are confidentially reported to the Ethics and Compliance Department.

Anonymous and Confidential Reporting

You are encouraged to provide your name when raising a concern. This allows those who are responding to your concern to contact you if additional information is needed to look into the concern thoroughly. If you choose to identify yourself when using our reporting mechanisms, Prosper Global will keep your information as confidential as possible, sharing it only with those who need the information to ensure the concerns in your report are addressed.

If you submit a report anonymously through the **web portal**, it is important to provide detailed information. Cases that lack sufficient information for investigators to pursue allegations may be closed.

Non-Retaliation Policy

We recognize it takes courage to speak up when something's not right. We understand that you might be uncomfortable or anxious. We do not tolerate retaliation against anyone who participates in an investigation, raises a legal or ethical concern, or reports misconduct in good faith. Good faith means that the report was made out of genuine concern for Prosper Global or team members involved. It also means that you have provided information that you believe to be comprehensive, honest, and accurate at the time, even if you are later proven to be mistaken. We consider acts of retaliation to be a serious violation of our ethics policies and values. Retaliation can take many forms, such as threats, intimidation, exclusion, humiliation, and raising issues maliciously. Any team member who believes they are being retaliated against should immediately report this to the Integrity Hotline. Team members who raise issues maliciously or in bad faith (e.g. where a report is knowingly false) will be subject to discipline.

What to Expect After Making a Report

If you make a report using our web portal or email address, you will receive confirmation of your submission. You may be contacted for clarification or additional information about your reported concerns, unless your feedback was submitted anonymously.

All reports are taken seriously and will be reviewed and addressed as appropriate. Our ability to provide updates related to your report is limited by our legal responsibilities and confidentiality obligations. Whenever possible, we will provide you with status updates so you know that your concern is receiving an appropriate response. We strive to complete our investigations in a timely and thorough manner. All reports are logged in our case management system. If at any point you are unsure if a report has gone through the proper channels and followed the established process, you can follow up by emailing the **Ethics and Compliance Department**.

Our first concern as we proceed with an inquiry is the safety and security of all involved, especially any survivor. We prioritize the safety, health, and well-being of all survivors and offer medical, legal, and psycho-social and emotional support as appropriate. Our Safeguarding investigators are all specially trained in providing a survivor-centered response. We assess risk to the survivor and all other parties to an investigation continuously. If we receive an allegation of sexual abuse, exploitation, or assault, we take appropriate steps to mitigate the risk of the accused individual causing further harm while we work through our investigative process.

If an allegation of misconduct were to involve an executive team or board member, we would engage external expert investigators to ensure the independence of the investigation and objectivity of the conclusions.

Manager's Role

As a manager, you have a heightened responsibility for setting the culture and work environment on your teams, which includes adherence to Prosper Global's policies and procedures. The way you make decisions, handle concerns, and hear different perspectives will set the foundation for trust with your team and stakeholders. Your success and the success of your team depends on the trust you build together and on holding one another accountable for living up to Prosper Global's ethical principles.

How to Include Ethics in Your Decision Making

- Lead by example and model ethical decision making by complying with Prosper Global's policies and procedures.
- Acknowledge that as we work through ethical issues together, we have both the power to perpetuate harm and the power to contribute to positive solutions.
- Recognize and value a team member's ethical and courageous behavior.
- Ensure your team knows that for results to matter, they must be achieved in a respectful, honest, and accountable way. Take the time to explain the Code of Ethics to new employees.
- Regularly reflect on and discuss ethical dilemmas that could arise in our work.
- When unethical behavior is demonstrated, report the incident, ensuring individuals are held accountable.
- Make time to provide guidance on ethical dilemmas when asked.
- Talk to your team about ethics and integrity; be clear that you expect work to be done ethically.
- Ensure your team is up to date on all mandatory Code of Conduct or ethics training.

How to Include Ethics in Your Decision Making

When you have to make a decision, refer to the questions found in the "How to use This Code" section. Remember that just because something is not expressly prohibited does not mean it is consistent with Prosper Global's Ethical Principles.

If you made a decision for ethical reasons, subject to our rules on confidentiality, share it with your team so they can benefit from your knowledge and follow your example.

How to Answer Your Team's Questions

Make sure you are aware of all Prosper Global's ethical policies. It is your responsibility to ensure your team knows about them. Take the time to listen to your team members; it might not be easy for them to bring up these types of questions.

If you do not know how to answer their questions, you must direct them to the Ethics and Compliance Department at **integrityhotline@prosperglobal.org.**

Enforcement and Discipline

Individuals who violate Prosper Global's policies and procedures, regardless of position or tenure, may be subject to disciplinary action, up to and including termination. The following are examples of conduct that may result in disciplinary action.

- Violating Prosper Global's policies and procedures
- Directing or encouraging others to violate Prosper Global's policies and procedures
- Failing to report known or suspected violations of Prosper Global's policies and procedures
- Interfering with an investigation
- Failing to cooperate with an investigator or auditor
- Being untruthful or intentionally withholding information during an investigation
- Retaliating against others for raising a concern

Violation of laws and regulations can trigger legal action against you, your colleagues, Prosper Global or its partners or suppliers that may result in:

- Fines and penalties
- Suspension of programming and funding or access to communities
- Debarment from donors and governments
- Formal charges against individuals or legal representatives of Prosper Global
- Imprisonment of individuals

Individuals who work on behalf of Prosper Global will be asked to sign or electronically acknowledge a statement certifying their understanding and commitment to complying with this Code and underlying policies. Individuals are expected to sign the statement at the onset of employment or engagement with Prosper Global, and annually thereafter. In addition, individuals who work for, or on behalf of Prosper Global will be required to annually complete Prosper Global's e-learning Code of Ethics training on Talent Development.

Conclusion

Ethics and compliance is the responsibility of every Prosper Global team member.

No matter what job you hold at Prosper Global or where you work, it is up to you to know and follow our Code. Our ability to continue to be a world class humanitarian and development organization depends on each of us being personally responsible for our conduct and “doing the right thing” for our donors, colleagues, partners, and communities. If you have any questions about our Code and underlying policies do not hesitate to contact the Ethics and Compliance Department.

Contact

STEVE LINICK

Chief Ethics and Compliance Officer | Ethics and Compliance Department

slinick@prosperglobal.com

INTEGRITY HOTLINE

integrityhotline@prosperglobal.com

ABOUT PROSPER GLOBAL

Barely enough is not enough for anyone. Prosper Global is a humanitarian organization working alongside communities facing conflict, climate change, and economic hardship to meet urgent needs and create the conditions for lasting progress. Today's challenges demand new solutions, so we pair local knowledge with global resources to help communities build what's needed, test what's possible, and scale what's proven so that people everywhere can pursue a full life on their own terms. In 2026, we changed our name from Prosper Global to Prosper Global, to reflect our belief that when every community can prosper, all of humanity moves forward.

prosper global

1111 NW 19th Street
Suite 650
Washington, D.C. 20036
prosperglobal.org