

SAFEGUARDING POLICY

Updated February 2025

1. PURPOSE

Grameen's mission is "to enable the poor, especially women, to create a world without hunger and poverty." In working with marginalized communities to achieve this mission, we have a responsibility to promote human dignity and ensure our work does not harm those we serve. Within our organization and partnerships, we also have a responsibility to maintain a safe and respectful environment. In achieving these objectives, we recognize the importance of organizational culture and accountability.

This Safeguarding Policy ("**SGP** or "**Policy**") is designed to protect Grameen Foundation USA (including branch offices and subsidiaries) ("**Grameen**"), Grameen Employees, Related Personnel, Implementing Partners and Beneficiaries. Specifically, this Policy, including the incorporated Safeguarding Standards¹, reflect Grameen's "Do No Harm" ("**DNH**") principles, while also protecting against and expressly prohibiting the following conduct:

- Gender-Based Violence and any form of Sexual Misconduct.
- Any form of Child and Vulnerable Adult Abuse.
- Human Trafficking, Child Labor, or violations of local labor laws.
- Discrimination, Violence, Harassment, Intimidation, or Bullying.
- Exploitation, intentionally or unintentionally, of Power Imbalances & Conflicts of Interest.
- Any of the abovementioned conduct in a digital space.

Collectively throughout this Policy we refer to the forgoing behaviors as "**Prohibited Conduct**".

Additionally, this Policy is in place to prevent and mitigate harm, as Prohibited Conduct can affect the well-being, confidence, or reputation of Grameen, personnel, partners, and communities with whom Grameen works. As such, Grameen will consider prevention and mitigation strategies throughout its internal operations and the entire program cycle (planning, design, implementation, monitoring, and evaluation) to minimize Prohibited Conduct and the risks that are unavoidable, unknown, or hard to predict, including unintended consequences.

Applying the DNH principle also involves a commitment to survivor-centered principles, which are safety, confidentiality, respect, and non-discrimination. When harm occurs, Grameen will

¹ The Safeguarding Standards are set forth in detail in Section 6.

respond with a survivor-centered approach, which is further detailed in Section 5: Investigations and Section 6: Safeguarding Standards.

Navigating this Policy

Section 2: Scope	States who is covered by this Policy.
Section 3: Violations and Consequences	Explains Grameen's zero tolerance approach to Policy violations and details on what is considered a Policy violation.
Section 4: Raising Concerns / Reporting	Covers mandatory reporting requirements, where to submit concerns and reports, and guidelines when reporting.
Section 5: Investigations	Provides an overview of Grameen's investigation process and survivor-centered approach.
Section 6: Safeguarding Standards	Further explains expectations and Prohibited Conduct, risk prevention measures, and how Grameen utilizes a survivor-centered approach.
Section 7: Oversight and Development	States who are responsible for updating and overseeing implementation of this Policy.
Section 8: Summary of Annexes	Links to Code of Conduct and Definitions (applicable to this Policy and the Code of Conduct).

2. SCOPE

This Policy, and the associated Code of Conduct, generally apply to:

- **Employees** include all full-time and part-time employees of Grameen branch offices, wherever located, and subsidiary organizations (under versions adopted by governing bodies);
- **Related Personnel** includes non-Employee Grameen actors, including but not limited to board members, Contractors (independent contractors, consultants, volunteers, interns, fellows, vendors)², Visitors³, in addition to individual and corporate contractors of these entities and their personnel; and
- **Implementing Partners ("IPs")** international or local organizations and institutions (public and private) who have contractual agreements (e.g. subaward or partnership agreements, or memoranda of understanding (MOUs)) with Grameen and are implementing or supporting Grameen's activities.⁴

² This Policy applies to [Contractors](#) through their contractual agreements with Grameen, unless stipulated otherwise in their respective contractual agreement. Whether or not this Policy and the associated Code of Conduct apply shall be based on the individual's or entity's scope of work.

³ [Visitors](#), which include anyone who visits a Grameen [Workplace](#) or engages with or observes Beneficiaries, who are informed about this Policy (ie. through signage posted or training instructions), are considered Related Personnel who must abide by this Policy.

⁴ [Implementing Partners](#) may follow their own safeguarding policy and code of conduct only when their policy and code meet the minimum standards set forth by Grameen's Policy and Code of Conduct. In any case, IPs remain obligated to



(Employees, Related Personnel, and IPs may be referred to collectively as “Covered Parties”).

The Policy applies both during and outside normal work hours. Actions taken by Covered Parties outside of working hours that contradict this Policy will be treated as a violation of this Policy.

3. VIOLATIONS AND CONSEQUENCES

Violations

Grameen has a **zero tolerance** approach in regards to Policy violations, which include:

1. Engaging in Prohibited Conduct; or
2. Failing to report actual or suspected violations of this Policy according to Section 4; or
3. Retaliating against, intimidating, or threatening a reporter or person participating in a Safeguarding investigation; or
4. Intentional omission of information relevant to a Safeguarding investigation; or
5. Intentional destruction of documents (electronic or physical), information, or evidence, related to a Safeguarding investigation; or
6. Unauthorized use of Grameen resources to manipulate or impact a Safeguarding investigation; or
7. Reporting allegations that prove to have been made maliciously or knowingly to be false.

Consequences

Covered Parties who violate this Policy are subject to discipline, up to and including termination of employment for Grameen Employees, unilateral termination of present engagements or agreements, declining future business relations, or removal from events or programs. If the failure to comply with this Policy also violates or could be in violation of applicable law, Grameen may refer the conduct to relevant law enforcement authorities.

4. RAISING CONCERNS / REPORTING

Mandatory Reporting

All Covered Parties **must and shall immediately report:**

- any and all violations, or suspected violations, of this Policy including the Code of Conduct; and
- any credible information about any past or ongoing safeguarding related matter which could impact Grameen in protecting Employees, Related Personnel, Implementing Partners and Beneficiaries from harm consistent with this Policy, or could impact the operations or reputation of Grameen.

report all allegations of Prohibited Conduct to Grameen in accordance with this Policy (see Section 4: Raising Concerns / Reporting).



Grameen has **zero tolerance for inaction** regarding reporting allegations of violations of this Policy. This includes anyone who receives concerns, reports, or information, whether directly or inadvertently, and fails to report.

Anyone reporting must do so in good faith, with reasonable grounds for the report. Any allegations that prove to have been made maliciously or knowingly to be false will result in adverse action against the reporter, as doing so is a violation of this Policy.

Grameen expressly prohibits any kind of retaliation against those who submit concerns or reports in good faith.

Where to Submit Concerns and Reports: Reporting Channels

Grameen has multiple safe, accessible, and anonymous feedback channels to receive concerns or reports. Covered Parties must use one of the channels listed below, whichever they feel most comfortable. Reports from Beneficiaries and the public are also welcome. These include:

- Optionally anonymous “hotline” voicemail submission by calling (202)-517-6677
- Optionally anonymous “hotline” written submission via [SuggestionOx](#)
- Email, meeting or phone call to [Safeguarding Focal Point](#) (SFP).⁵ Alternatives include a Grameen Safeguarding Office member (legal or human resources personnel), or Grameen supervisor or leadership team member.
- Email sent directly to the Safeguarding Office, via complaints@grameenfoundation.org
- [Project Specific] Community-based complaints mechanism, to be determined in each country and on the basis of project need and budget, in partnership with IPs.

If a person is not comfortable with the reporting channels above or has concerns about the behavior of the Safeguarding Office, they can contact Grameen’s CEO or Board Chair.

Guidelines for Reporting or Raising Concerns

The following guidelines serve to protect reporters and survivors, promote confidentiality, ensure that Grameen has the opportunity to quickly address harm, and protect the integrity of investigations.⁶

1. Grameen encourages reporters to provide as much information as possible and, if the reporter is comfortable, to identify themselves.

⁵ Grameen will use best efforts to ensure Covered Parties have the contact information of their Grameen SFP. If you are unsure, please ask your relevant Grameen contact or the Safeguarding Office via the email above.

⁶ Grameen Employees and applicable Related Personnel should additionally refer to Grameen’s Safeguarding Procedures Manual for internal guidelines related to reporting.

2. In order to preserve confidentiality and promote the survivor-centered approach, please do not copy-in other people, such as supervisors, partners, colleagues, or others on safeguarding reports or safeguarding emails. The Safeguarding Office will connect with all relevant persons in their investigation.
3. After submitting a report or concern, please continue to maintain confidentiality about the substance of the report, including the identities of those involved, and the fact that a disclosure has been made.

These guidelines are not intended to dissuade or prohibit a person from communicating with law enforcement personnel or other professionals outside of Grameen as may be legally or medically necessary.

5. INVESTIGATIONS

The Safeguarding Office, composed generally of Grameen's legal and human resources personnel, will promptly conduct investigations in a competent and professional manner.

Grameen's Safeguarding Office will conduct investigations in a way that prioritizes the specific needs of survivors and incorporates survivor-centered principles (safety, confidentiality, respect, and non-discrimination), while also considering the appropriate due process and accountability for alleged wrongdoers.

For investigations involving allegations of sexual misconduct, child or vulnerable adult safeguarding incidents, or trafficking in persons, Grameen will place the survivor's experiences, considerations, and needs at the center of the process. Additional measures will be taken when the survivor is a child or vulnerable adult. For more information on specific survivor-centered approaches, see the [Safeguarding Standards](#).

The Safeguarding Office is solely responsible for determining which reports warrant a Safeguarding investigation, conducting investigations, and recommending remedial measures. They may add additional members to an Safeguarding Office investigation team, including third party experts, as they deem appropriate to meet their obligations under this Policy.

6. SAFEGUARDING STANDARDS



Introduction to the Safeguarding Standards

Grameen's Safeguarding Standards ("Standards"), as incorporated into this Policy, serve to:

- expand on how Grameen applies the "Do Not Harm" principle, which involves engaging in risk-aware programming and risk- prevention by taking appropriate safeguarding actions to prevent and mitigate harm, and responding appropriately with survivor-centered principles when harm occurs. Details on internal risk prevention strategies, including hiring and training safeguarding practices and the use of Risk and Safeguarding Assessment and Action Plans, are found in Grameen's Safeguarding Processes and Procedures Manual; and
- inform Covered Parties of Grameen's expectations in complying with this Policy and explaining Prohibited Conduct.

Navigating the Safeguarding Standards

[Standard 1](#): No Retaliation - Whistleblower (Reporter) Protections

[Standard 2](#): Prevention of Gender-Based Violence & Sexual Misconduct

[Standard 3](#): Child & Vulnerable Adult Safeguarding

[Standard 4](#): Labor Protection & Counter-Trafficking in Persons

[Standard 5](#): Creating Safe & Respectful Environment for All

[Standard 6](#): Awareness of Power Imbalances, (Non-sexual) Exploitation, & Conflicts of Interest

[Standard 7](#): Digital Safeguarding

Standard 1: No Retaliation - Whistleblower (Reporter) Protections

Grameen maintains a Whistleblower Policy. Whistleblowing is the formal word for the reporting of suspected or actual policy violations, unethical, or illegal practices committed by Covered Parties.

To encourage reporting, Grameen has zero tolerance for [retaliation](#) against a person who makes a good faith report or who participates in an investigation. Any retaliation is a violation of the Whistleblower Policy and also considered Prohibited Conduct under this Policy.

Any person who makes a report in good faith or participates in an investigation, will not be discharged, demoted, or otherwise discriminated against by Grameen or a Covered Party as reprisal for making the report or participation in the investigation.⁷

Reports will be kept as confidential as possible to minimize the potential for retaliation and to encourage reporting.

⁷ Employees of Grameen and subawardees working with U.S. government funds are afforded the employee whistleblower rights and protections under 41 U.S.C 4712.



Standard 2: Prevention of Gender-Based Violence & Sexual Misconduct

Introduction & Values

Gender-based violence (GBV) involves any harmful act that is perpetrated against a person's will and that is based on socially ascribed (e.g. gender) differences between males and females.⁸ Sexual Misconduct, which includes sexual abuse, assault, exploitation, and harassment, is often a form of GBV. However, Sexual Misconduct can be perpetrated by individuals regardless of their gender and may occur against people of a different or the same gender.

Grameen believes that all people have a right to live their lives free from GBV and Sexual Misconduct regardless of age, gender, sexuality, sexual orientation, gender identity, disability, religion, race, ethnicity, or any other status. Grameen recognizes that acts of GBV are a violation of human rights and result in serious long-term harm to survivors.

As economic opportunities, gender norms, or power dynamics within households and communities shift through Grameen's programming, Grameen is aware that these changes may unintentionally increase the likelihood of GBV. Additionally, unequal power dynamics are inherent between and among Covered Parties and Beneficiaries, and Grameen recognizes there is a risk of some people exploiting their position of power for sexual purposes. This Safeguarding Standard, in conjunction with Grameen's hiring and training safeguarding practices and risk-aware programming resources, are in place to prevent and mitigate unintended consequences and risks related to GBV.

Prohibited Sexual Misconduct

Grameen requires Covered Parties promptly report any actual or suspected Sexual Misconduct, thus allowing for early intervention and action.

A key aspect of prevention is Covered Parties being aware of what constitutes Prohibited Sexual Misconduct:⁹

- Sexual abuse: Any actual or threatened physical intrusion of a sexual nature whether by force or under unequal or coercive conditions. When carried out against a child by an adult, such conduct is considered sexual abuse even in the absence of force or unequal or coercive conditions.¹⁰
- Sexual assault: Any non-consensual sexual act proscribed by Federal, tribal, or State law, including when the victim lacks capacity to consent. The act or conduct may include

⁸ Definition of GBV is from the [ISAC Guidelines on Integrating Gender-Based Violence Interventions in Humanitarian Action](#), which further states that GBV includes, "acts that inflict physical, sexual or mental harm or suffering, threats of such acts, coercion, and other deprivations of liberty. These acts can occur in public or in private."

⁹ Based on the [USAID PSEA Policy](#). Whether an action constitutes sexual misconduct does not depend on the intent of the alleged perpetrator, but rather, is evaluated from the objective standpoint of a reasonable person. Actions that constitute sexual misconduct include, but are not limited to: physical, verbal, non-verbal, and/or written acts, including comments, jokes, gestures, the posting of images, sexual advances, the offering of sexual incentives, and the threat of consequences for the refusal of sexual advances.

¹⁰ [Domestic abuse](#) may or may not be of sexual nature or an act of GBV, but it is still Prohibited Conduct. Grameen will follow the survivor-centered approach under this standard in responding to allegations of domestic abuse.



physical force, violence, threat, intimidation, ignoring the objections of the other person, causing the other person's intoxication or incapacitation (through the use of drugs or alcohol) or taking advantage of the other person's intoxication (including voluntary intoxication).

- Sexual exploitation: Any actual or attempted abuse by Covered Parties of a position of vulnerability, differential power or trust, for sexual purposes, including profiting monetarily, socially or politically from the sexual exploitation of another. In more basic terms, sexual exploitation occurs when a person coerces or convinces someone with less power to participate in sexual activities. This includes forced marriage, sexual slavery, and sex trafficking.
- Sexual harassment: a continuum of unacceptable and unwelcome behaviors or practices of a sexual nature or about a person's sex (whether verbal, physical, or gestures), which (1) cause offense or humiliation, (2) disrupt another person's duties, job performance or creates a hostile or offensive environment, (3) or which results in an adverse employment decision for the victim (such as the victim being fired or demoted).

In humanitarian settings, Grameen is bound by the [IASC Six Core Principles Relating to Sexual Exploitation and Abuse](#) ("Principles"), and thus applies these principles to all its programming (whether in a humanitarian setting or not).

The Principles, as tailored to Grameen's operations and as applicable to Covered Parties, are as follows:

1. Sexual Misconduct by Covered Parties is prohibited by Grameen. Acts of Sexual Misconduct are considered gross misconduct and are therefore grounds for termination of the Covered Party's relationship with Grameen.
2. Sexual activity with children (persons under the age of 18) is prohibited regardless of the age of majority or age of consent locally. Mistaken belief regarding the age of a child is not a defense.
3. Exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading or exploitative behavior is prohibited. This includes exchange of assistance that is due to Beneficiaries.
4. Any sexual relationships with Beneficiaries are prohibited unless the Covered Party was married to the Beneficiary prior to the beginning of the Grameen program.
5. If a Covered Party develops concerns or suspicions regarding Sexual Misconduct by another Covered Party, whether in the same organization or not, they must report such concerns using according to [Section 4: Reporting](#).
6. Covered Parties are obliged to create and maintain an environment which prevents GBV and Sexual Misconduct and promotes the implementation of this Policy and Grameen's Code of Conduct. Managers at all levels have particular responsibilities to support and develop systems which maintain this environment.



Survivor-Centered Approach to Sexual Misconduct

In responding to potential Sexual Misconduct incidents, Grameen will keep the survivor informed and offer the survivor participation in the remedial measure evaluation and recommendation process. Grameen will prioritize a survivor's safety and ask the survivor for consent before disclosing the survivor's information unless required by law at which time the survivor shall be informed of Grameen's obligations.

Those interacting with reporters of Sexual Misconduct, which may be the survivor, must prioritize confidentiality to minimize further harm.¹¹

Standard 3: Child & Vulnerable Adult Safeguarding

Grameen acknowledges that children and vulnerable adults have the right to be protected from harm. Grameen takes seriously its duty of care towards the children and vulnerable adults that Covered Parties assist, work with, or come into contact with.

Under this Policy, a "child" is anyone under the age of 18 and a "vulnerable adult" is any person aged 18 or older who, due to physical or mental disability, illness, age-related conditions (whether diagnosed or not) is unable to protect themselves from harm, exploitation, abuse, or neglect.

In particular, Grameen recognizes that children and vulnerable adults can be intentionally or unintentionally harmed through the delivery of its programs. Thus, to ensure the safety and welfare of the children and vulnerable adults that Grameen works with, or comes into contact with through its programming, Grameen abides by the following safeguarding principles and requires Covered Parties to do so as well:

1. Do not engage in child abuse, exploitation, and neglect.
 - [Child or vulnerable adult abuse](#) means emotional, physical, sexual, or any other ill-treatment carried out against a child or vulnerable adult by an adult, including trafficking and all kinds of exploitation resulting in actual or potential harm to the person's health, well-being, survival, development, or dignity.
 - Child or vulnerable adult abuse includes grooming of children and vulnerable adults in preparation for abuse.¹²
 - Neglect means a failure to provide for a child's or vulnerable adult's basic needs by persons who are responsible for the care of the child or vulnerable adult.
2. Ensure compliance with host country and local child welfare and protection legislation or international standards, whichever gives greater protection, and with U.S. law where applicable.

¹¹ When the Sexual Misconduct survivor is a child or vulnerable adult, please additionally refer to the survivor-centered approach under Standard 3: Child & Vulnerable Adult Safeguarding.

¹² The categories of child and vulnerable abuse are further detailed in under the definition of [Child and Vulnerable Adult Abuse](#) in Annex 1: Definitions.



3. Consider child safeguarding in project planning and implementation to determine potential risks to children that are associated with project activities and operations.
4. Apply measures to reduce the risk of child abuse, exploitation, or neglect, including, but not limited to, limiting unsupervised interactions with children; prohibiting exposure to pornography; and complying with applicable laws, regulations, or customs regarding the photographing, filming, or other image-generating activities of children.
5. Promote child-safe screening procedures for personnel, particularly personnel whose work brings them in direct contact with children.
6. Have a procedure for ensuring that personnel and others recognize child or vulnerable adult abuse, exploitation, or neglect; mandating that personnel and others report allegations; investigating and managing allegations; and taking appropriate action in response to such allegations.

Survivor-Centered Approach to Child & Vulnerable Adult Safeguarding Incidents

In responding to child or vulnerable adult safeguarding issues, Grameen will consider the best interests of the child or vulnerable adult and will engage with the family and/or caregivers, as appropriate.

Grameen will always report complaints of criminal behavior against children and vulnerable adults to local law enforcement authorities. Covered Parties are required to report suspected or witnessed child or vulnerable adult abuse (including neglect) by the parent or guardian, caregiver, or by any other person.

Standard 4: Labor Protection and Counter-Trafficking in Persons

Grameen is committed to protecting the fundamental human rights of workers, as guided by the international labor standards and decent work principles set forth in the [International Labour Organization's \(ILO's\) Fundamental Conventions and Recommendations](#).

The ILO Fundamental Conventions define [unacceptable conditions of work](#), outlaw discrimination in the workplace, ensure freedom of association, the right to organize and collective bargaining, the right to equal remuneration for work of equal value, and the right to a safe and healthy working environment. Grameen supports these rights in relation to its Employees and applicable Related Personnel.

Grameen adheres to U.S. labor laws and its own human resources policies in relation to its own Employees and applicable Related Personnel, which may be more stringent than the ILO Fundamental Conventions. Grameen offices worldwide will comply with local labor laws in relation to locally-hired Employees and applicable Related Personnel. Grameen prohibits forced labor, slavery, human trafficking, or child labor (as defined below), requires Covered Parties to comply with local labor laws, and encourages adherence to the ILO Fundamental Conventions.



Child Labor

Given engagement with microfinance services and economic strengthening programming can increase the likelihood of risk to a Beneficiary's child or child under their care, such as increased exposure to workplace safety hazards and in the most extreme cases child labor, Grameen commits to take measures to ensure the safety and welfare of the children and, to the best of its ability, ensure compliance with local child welfare and protection legislation or international standards, whichever gives greater protection.

Grameen prohibits [child labor](#) and will not knowingly develop projects or other support services for Beneficiaries who use child labor or unsafe work practices that put children or employees in harm's way. Additionally, Grameen will not knowingly partner with contractors or IPs who use child labor or unsafe work practices, and expects Covered Parties to do the same.

Children aged 16-17 may work in Grameen undertaking [non-hazardous](#) work only.

Any cases of child labor will be reported to local law enforcement and/or local social support organizations where applicable, following consultation with the victim (unless Grameen determines that such consultation is not possible because the victim remains in a state of captivity, is otherwise unreachable, would cause additional economic pressure on the household and/or cannot otherwise be mitigated through improving workplace safety concerns).¹³

Human Trafficking

Grameen follows international standards in relation to the offense of trafficking in persons, which is a form of modern slavery and a grave violation of human rights.

Grameen prohibits trafficking in persons, which is defined as:

- the recruitment, transportation, transfer, harboring or receipt of persons by means of the threat or use of force or other forms of coercion, abduction, fraud, deception, the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation includes, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labor or services, slavery or practices similar to slavery, servitude or the removal of organs.¹⁴
- [Consent](#) is irrelevant where any of the means above are used. The recruitment, transportation, transfer, harboring or receipt of a child for the purpose of exploitation is considered "trafficking in persons" even if this does not involve any of the means above.
- Grameen prohibits conduct that supports, facilitates, or advances trafficking in persons.

Grameen and Covered Parties shall not knowingly fund or conduct business with persons or entities who use the labor of trafficked persons.

¹³ In responding to instances of child labor, Grameen will apply the survivor-centered approach under Standard 3.

¹⁴ Definition of trafficking is from the [Protocol to Prevent, Suppress, and Punish Trafficking in Persons, especially Women and Children, supplementing the UN Convention against Transnational Organized Crime](#).



Survivor-Centered Approach to Human Trafficking

Any entity associated with Grameen that is suspected to be engaging in trafficking in persons for the purposes of labor or sexual exploitation will be promptly reported to local law enforcement. In addition to Grameen's [reporting mechanisms](#), suspected human trafficking activity may also be reported to the Global Human Trafficking Hotline by calling 1-844-888-FREE or emailing help@befree.org. Additional methods of reporting and victim support may be found at <https://globalmodernslavery.org/> (global hotlines and service providers).

Beyond adhering to survivor-centered principles, Grameen will respond to potential human trafficking reports in a manner that is trauma-informed, survivor-informed, and culturally competent.

Standard 5: Creating Safe & Respectful Environment for All

Grameen aims to provide a safe, healthy, and efficient environment - whether that be in the workplace or during project implementation - where all persons are treated with civility, dignity, and respect.

Grameen is aware that there are several reasons why a person would be reluctant to report the behaviors described in this Standard (i.e. discrimination or harassment in the workplace), including lack of comfortability or fear of retaliation. However, Grameen is committed to addressing behaviors of this nature and provides several reporting channels, including optionally anonymous submissions. Additionally, Grameen will always respond to reports in a manner that emphasizes confidentiality, safety, and respect, and explicitly prohibits retaliation of any form.

Non-Discrimination, Diversity and Inclusion

Grameen prohibits [discrimination](#) in all its forms in its workplaces; in the recruitment, hiring development, training and promotion of Employees and applicable Related Personnel; and in its programming, including on the basis of race, ethnicity, sex or gender (including pregnancy, gender identity, gender expression or status as a transgender individual), sexual orientation, color, creed, national origin, citizenship, ancestry, age, disability, veteran's status, HIV status, religion, belief (or lack thereof), genetic information, education, class, income, urban/rural residence, marital status, parental status, political opinion and affiliation, or other relevant status or characteristic. Additionally, Grameen promotes diversity, equity, and inclusion among its own operations, in the design of its programs, and in implementing programs.

Covered Parties are expected to abide by the same non-discrimination standards and prohibit discrimination in their operations. Any validated reports of Covered Parties acting in a discriminatory manner will result in termination of the Covered Party's relationship with Grameen.

Programs specifically designed to empower vulnerable or minority groups to remedy existing discrimination or exclusion will not be deemed discriminatory or exclusionary pursuant to this Policy.



Prohibition of Violence, Intimidation, Harassment, and Bullying

Grameen prohibits [violence](#) or threats of violence during or related to Grameen business or programming, whether occurring in a Grameen Workplace, while traveling, or during functions, trainings, workshops or meetings held off site.

Grameen prohibits [harassment](#), [intimidation](#), and [bullying](#) that disrupts another person's duties or job performance or that creates an intimidating, offensive, humiliating, threatening, or hostile environment. Those on the receiving end of such conduct are encouraged, but are not required, to inform the wrongdoer that the conduct is unwelcome.

Managers and supervisors have a heightened obligation to ensure their treatment of and interactions with others are appropriate and respectful, and that intimidation is not used to make others do something they should not or cannot do. Supervisor intimidation can be more subtle but just as threatening given a supervisor's ability to impose performance or disciplinary actions against Grameen Employees and relevant Related Personnel.

Physical Safety and Security

Grameen takes safety and security seriously and is committed to providing a safe working environment for Covered Parties and safe and meaningful engagement of Beneficiaries. Grameen will consider security and safety in program risk assessments, and use best efforts to ensure that all activities are held in secure venues with appropriate and relevant safety equipment.¹⁵

Weapons are prohibited in Grameen workplaces, including firearms or explosives.

Standard 6: Awareness of Power Imbalances, (Non-sexual) Exploitation & Conflicts of Interest

Grameen acknowledges that inherent power imbalances exist between humanitarian workers and Beneficiaries, especially when assisting vulnerable populations. Because abuse of power can occur in a variety of contexts in varying degrees, Grameen expects Covered Parties to be aware of this inherent power balance and to act with integrity and transparency.

Exploitation of power imbalances and abuse of power by Covered Parties can have far-reaching consequences for those taken advantage of, including emotional harm, loss of confidence, and more.

Furthermore, when Covered Parties act on inherent power balances, they impact the communities Grameen works with, as Beneficiaries lose trust in Grameen. In turn, this affects Grameen's (and other organizations like Grameen) ability to effectively provide resources and assistance in these communities. This loss of trust may also occur in the context of donor and partner relationships, which could further affect Grameen's ability to carry out its mission.

¹⁵ Grameen will provide Employees and applicable Related Personnel with access to Grameen's Field Office Security Handbook.



Grameen prohibits exploitation or abuse of power, which means attempting to use or using one's status, position, differential power, or affiliation with Grameen to cause harm or to solicit or obtain a personal benefit. Relatedly, Grameen prohibits Covered Parties from using their positions for a purpose that constitutes or creates the appearance of a conflict of interest.

Determining whether an abuse of power or a conflict of interest has occurred is based on the totality of circumstances, including but not limited to:

- the actual relationship between the individuals involved;
- the duration and nature of the relationship (ie. differential status, vulnerability, etc);
- the objectives of the Covered the Party;
- the personal benefit (defined below) contemplated, solicited, and/or received;
- any resulting harm; and
- the cultural context.

As used in this section, personal benefits may range from gratuities, favors, social or political gains, to anything of monetary value (ie. payments, discounts, loans), however, Grameen recognizes that what constitutes a personal benefit may depend on the context.¹⁶ If a Covered Party is in doubt about whether a situation is prohibited, please reach out to the Safeguarding Office.

Based on the foregoing prohibition, Grameen generally prohibits solicitation and/or entering into personal financial transactions with IPs or Beneficiaries. Not only do these transactions involve a conflict of interest, these transactions also represent an abuse of inherent power, as Beneficiaries who receive Grameen's services or IPs that are granted subawards from Grameen may feel unspoken pressure or influence to transact with Covered Parties.

Grameen also prohibits Employees and Related Personnel from having a financial or other interest in, or a tangible benefit from, an IP considered for a subaward. Employees and applicable Related Personnel must abide by internal policies and procedures to screen for organizational conflict of interests when considering IPs who may receive subawards.

Standard 7: Digital Safeguarding

Grameen and Covered Parties are expected to make all reasonable efforts to ensure that data collection, storage and security, communications, outreach, and stakeholder engagement activities do not cause harm, especially to Beneficiaries.

Covered Parties must abide by this Policy and the Code of Conduct when acting in a digital space.

In addition, Covered Parties are expected to abide by the following digital safeguarding principles:

¹⁶ When abuse of power or exploitation is carried out for a sexual purpose, this constitutes Sexual Misconduct.



- External communications and media of all kinds should align with Grameen's charitable mission and values.
- Reasonable care should be taken to keep non-public information confidential.¹⁷
- Periodically review your organization's IT related policies to mitigate and prevent digital/cybersecurity risks.
- Adhere to the data best practices below.

Data Best Practices

In programmatic contexts, Grameen is (1) committed to protecting data subjects and (2) using and sharing personal data primarily for poverty alleviation.

All Covered Parties must follow applicable legislation when conducting any programmatic activities relating to personal data. Grameen Employees and relevant Related Personnel are to additionally follow Grameen's Data Privacy Policy when processing personal data of Grameen's employees, partners, and Beneficiaries.

In general, Covered Parties should collect and process as little personal data as possible, ensure data subjects' rights are upheld, always obtain required consents, anonymize data when possible, and utilize applicable data protection tools to limit access and promote security.

When sharing photos, videos, or stories of Beneficiaries, Covered Parties must:

- Obtain appropriate consent based on who the subject is (ie. in the appropriate language or guardian of a child).
- Do not exploit the media subject and accurately portray reality, with special consideration given to children and other vulnerable subjects or situations.
- Unless authorized by the data subject, details about the subject should not be too revealing, meaning that a reasonable person should not be able to locate or contact the subject based on the content shared by Grameen.
- Honor any requests (ie. name change) by the data subject.

Unintended Consequences of Digital Technologies

Grameen recognizes that digital technologies - often a key feature of Grameen's program services - may pose a short-term or long-term risk of harm. These risks include the erosion of social fabric and human connection as in-person interactions are replaced by online ones or social media as well as risks to exposure or misuse of Beneficiaries' data during project implementation and beyond.

While aiming to decrease the digital divide and using various technology applications for improved efficiency or increased outreach of information, financial resources or other goods and services, Grameen and Covered Parties will, to the best of their ability, identify the potential adverse effects of digital interventions, including those that replace in-person activities with digital ones, and will seek to mitigate those risks during the program period.

¹⁷ Employees and applicable Related Personnel must abide by internal Grameen policies relating to confidential information and other IT-related policies.



7. OVERSIGHT & DEVELOPMENT

Under the direction of Grameen's Leadership Team, the Safeguarding Office will oversee the development of procedures and updates to this Policy. Grameen's Gender Working Group, with assistance from the Safeguarding Office, will oversee the training needed to implement the Policy.

8. SUMMARY OF ANNEXES

[Annex 1](#): Definitions (applicable to this SGP and the Code of Conduct)

[Annex 2](#): Code of Conduct

Annex 1 - Definitions & Abbreviations

The following definitions apply to Grameen's Safeguarding Policy and Code of Conduct.

Beneficiaries (or clients, program participants) – any person who directly or indirectly benefits from a Grameen program, project, product or service, including attendees of training sessions, workshops, and seminars; end users of financial products and services or digital tools and their family members; and community members.

Bullying – any pattern of behavior occurring in the workplace that harms, intimidates, offends, degrades, threatens, berates, humiliates, or prevents work from getting done.

Child – any person who has not attained the age of 18 years, despite any local law defining a different age of majority or age of consent. Mistaken belief as to the age of the child is not a defense.

Child and [Vulnerable Adult](#) Abuse – physical, sexual and/or emotional abuse, exploitation and neglect (all defined below), trafficking, or commercial, transactional, labor, or other exploitation resulting in actual or potential harm to the child's or vulnerable adult's health, well-being, survival, development, or dignity. It includes, but is not limited to, any act or failure to act which results in death, serious physical or emotional harm to a child or vulnerable adult, or an act or failure to act which presents an imminent risk of serious harm to a child vulnerable adult.

- **Physical Abuse** – acts or failures to act resulting in injury (not necessarily visible), unnecessary or unjustified pain or suffering without causing injury, harm, or risk of harm to a child's or vulnerable adult's health or welfare, or death. Such acts may include, but are not limited to punching, beating, kicking, biting, shaking, throwing, stabbing, choking, or hitting (regardless of object used), or burning. These acts are considered abuse regardless of whether they were intended to hurt the victim.
- **Sexual Abuse** – any actual or threatened physical intrusion of a sexual nature whether by force or under unequal or coercive conditions. When carried out against a child by an adult, such conduct is considered sexual abuse even in the absence of force or unequal or coercive conditions. Sexual abuse may include fondling a child's or vulnerable adult's



genitals, penetration, incest, rape, sodomy, indecent exposure, and exploitation through prostitution or the production of pornographic materials.

- **Emotional Abuse (or ill-treatment)** – injury to the psychological capacity or emotional stability of the child or vulnerable adult caused by acts, threats of acts, or coercive tactics. Emotional abuse may include, but is not limited to, humiliation, control, isolation, withholding of information, or any other deliberate activity that makes the child or vulnerable adult feel diminished or embarrassed.
- **(Child or Vulnerable Adult) Exploitation** – the abuse of a child or vulnerable adult where some form of remuneration is involved or whereby the perpetrators benefit in some manner. Exploitation represents a form of coercion that is detrimental to the child's or vulnerable adult's physical or mental health, development, education, or well-being.
- **Neglect** – failure to provide for a child's or vulnerable adult's basic needs by persons who are responsible for the care of a child or vulnerable adult.
- **Grooming** – behavior that makes it easier for an offender to procure a child or vulnerable adult for sexual activity. For example, an offender might build a relationship of trust with the child or vulnerable adult, their family, or their community, and then seek to sexualize that relationship (e.g. by encouraging romantic feelings or exposing the victim to sexual concepts through pornography). Grooming often involves normalizing their behavior to everyone, not only the child or vulnerable adult, and can also involve bestowing gifts, favors or money on the child, their family, and/or the community.

Child Labor – any work that deprives children of their childhood, their potential and their dignity, and that is harmful to their physical and mental development. In relation to children undertaking work in Grameen's activities, Grameen defines child labor as any work by a child under the age of 16, whether paid or unpaid. However, where country-level policies have a stricter definition of child labor, Grameen will follow the policy of the country.

Consent - Consent is an agreement to acts, freely given without any element of force, fraud, deceit, or coercion - whether physical, emotional, economic or social in nature. The two necessary components of consent are that it be both informed and voluntary, meaning involved persons fully understand the sexual act to which the agreement of "yes" is made, without any use of influence, force, or coercion. Children are minors and can never give consent to a sexual act or relationship with an adult.

Contractors – third parties (individuals or legal entities) that undertake work or conduct business with or for Grameen through a contractual agreement, including independent contractors, consultants, vendors, volunteers, fellows, and interns, whether paid or unpaid.

- ***All Contractors are considered Related Personnel who must abide by this Policy and Code of Conduct***, unless, due to the scope of work, a Contractor's respective contractual agreement with Grameen does not mandate adherence to this Policy or the Code.
- IPs are not considered "Contractors" and are defined below.

Discrimination - the unfair or prejudicial treatment of people or groups based on their characteristics, identities, or experiences. In the context of providing programming/services to



Beneficiaries, discrimination includes, but is not limited to, withholding, adversely impacting, or denying equitable access to benefits of the programming.

Domestic Abuse – a pattern of behavior in any relationship, either within a household or with an intimate partner, that is used to gain or maintain power and control over that person. Abuse can be physical, sexual, emotional, economic or psychological actions or threats of actions that influence another person. This includes any behaviors that frighten, intimidate, terrorize, manipulate, hurt, humiliate, blame, injure or wound someone. Victims are most often intimate partners, but may also be children, parents, or other relatives or members of the household.

Employees – includes all full-time and part-time employees of Grameen branch offices, wherever located, and subsidiary organizations (under versions adopted by governing bodies).

Exploitation of Power Imbalances (or abuse of power) - means attempting to use or using one's status, position, differential power, or affiliation with Grameen to cause harm or to solicit or obtain a personal benefit.

- Relatedly, Grameen prohibits Covered Parties from using their positions for a purpose that constitutes or creates the appearance of a conflict of interest; financial transactions with IPs or Beneficiaries; or having a financial interest in an IP considered for a subaward.
- ***Safeguarding Standard 6 should be carefully reviewed in conjunction with this definition.***

Harassment – unwanted conduct occurring in the workplace, where a person is subjected to behavior that is repeated, unwelcome, and unsolicited; the person considers it to be offensive, intimidating, humiliating, or threatening; and/or a reasonable person would consider it to be offensive, humiliating, intimidating, or threatening. Workplace harassment covers a wide range of behaviors and can include unwelcome physical, verbal, or non-verbal conduct.

Hazardous Work – work which, by its nature or the circumstances under which it is carried out, is likely to harm the health, safety or morals of children, and includes work which exposes children to physical, psychological or sexual abuse; work underground, under water, at dangerous heights or in confined spaces; work with dangerous machinery or involving heavy loads; work in an environment which may expose children to hazardous temperatures, substances, noise levels or vibrations; work for long hours or during the night or where the child is confined to the premises.

Implementing Partners (IPs) – international or local organizations and institutions (public and private) which sign agreements (e.g., subaward agreements or memoranda of understanding (MOUs)) with Grameen and are implementing or supporting Grameen's activities. When Grameen's Safeguarding Policy and Code of Conduct apply to an IP (see Section 2: Scope), then an IP's subcontractors must also abide by the Policy and Code.

Intimidation – any behavior or pattern of behavior which frightens or is reasonably calculated to frighten another into submission, silence, compliance, or acquiescence with respect to behaviors or actions that are inappropriate, unlawful, or violative of policy or procedure or which unreasonably disrupt or create a hostile work environment.



Leadership Team (LT) - Grameen Foundation, USA's leadership team.

Prohibited Conduct - includes Gender-Based Violence and any form of Sexual Misconduct; any form of Child and Vulnerable Adult Abuse; Human Trafficking; Child Labor; Discrimination, Violence, Harassment, Intimidation, or Bullying; Exploitation, intentionally or unintentionally, of Power Imbalances & Conflicts of Interest; or Any of the previously mentioned conduct in a digital space.

Related Personnel - includes non-Employee Grameen actors, including but not limited to board members, [Contractors](#) (independent contractors, consultants, vendors, volunteers, interns, fellows), [Visitors](#), in addition to individual and corporate contractors of these entities and their personnel.

- ***The Safeguarding Policy and Code of Conduct generally apply to all Related Personnel***, however, the [Section 2: Scope](#) and the definitions of Contractors and Visitors should be reviewed to determine the scope of applicability in individual cases.

Report - Reports encompass concerns or complaints. A Report is information submitted regarding conduct that is a potential, suspected, or known violation of the Safeguarding Policy or Code of Conduct.

- Refer to the definition of Prohibited Conduct (and related definitions), the [Safeguarding Standards](#), and the terms of [Code of Conduct](#), for more details on conduct that must be reported.

Reporter (or Complainant) - a person making or escalating the Report, which may be the survivor of a safeguarding incident, or another person who becomes aware of the wrongdoing. Whistleblowers also fall under this definition.

Retaliation - Any action taken by a person, to silence, discourage, or prevent a Reporter's disclosure or any person's participation in an investigation. Retaliation may include Bullying, Harassment, Intimidation, or acts such as a job termination, demotion, or relocation or otherwise, threatening, intimidating, or frightening a person with adverse action. Retaliation is Prohibited Conduct.

Safeguarding - Any action taken to prevent or mitigate harm.

Safeguarding Focal Point (SFP) – an individual (typically an Employee) appointed by Grameen's headquarters in each country office or for each project to perform specific functions under this Policy, including receiving complaints from reporters.

Safeguarding Office - includes Grameen's HR and Legal personnel, and any additional members, as requested by the Safeguarding Office. The Safeguarding Office is solely responsible for determining whether disclosures warrant an investigation and conducting safeguarding investigations.

Sexual Misconduct - includes sexual abuse, assault, exploitation, and harassment:

- **Sexual Abuse** – any actual or threatened physical intrusion of a sexual nature whether by force or under unequal or coercive conditions. When carried out against a child by an adult, such conduct is considered sexual abuse even in the absence of force or unequal



or coercive conditions. This includes any sexual activity with a child defined under “Child Abuse” above.

- **Sexual Assault** - any non-consensual sexual act proscribed by Federal, tribal, or State law, including when the victim lacks capacity to consent. The act or conduct may include physical force, violence, threat, intimidation, ignoring the objections of the other person, causing the other person’s intoxication or incapacitation (through the use of drugs or alcohol) or taking advantage of the other person’s intoxication (including voluntary intoxication).
- **Sexual Exploitation** – any actual or attempted abuse by Covered Parties of a position of vulnerability, differential power or trust, for sexual purposes, including profiting monetarily, socially or politically from the sexual exploitation of another. In more basic terms, sexual exploitation occurs when a person coerces or convinces someone with less power to participate in sexual activities. This includes forced marriage, sexual slavery, and sex trafficking.
- **Sexual Harassment** – a continuum of unacceptable and unwelcome behaviors or practices of a sexual nature or about a person’s sex (whether verbal, physical, or gestures), which (1) cause offense or humiliation, (2) disrupt another person’s duties, job performance or creates a hostile or offensive environment, (3) or which results in an adverse employment decision for the victim (such as the victim being fired or demoted).

SGP (or Policy) – is Grameen’s Safeguarding Policy.

Survivor-Centered Approach - means the process used in investigating a complaint, and regardless of the allegation, Grameen will do so in a manner that prioritizes the specific needs of survivors and incorporates survivor-centered principles (safety, confidentiality, respect, and non-discrimination), while also considering the appropriate due process and accountability for alleged wrongdoers. Additional measures will be taken when the the allegations involve sexual misconduct, human trafficking, or a child safeguarding incident.

Trafficking in Persons – the recruitment, transportation, transfer, harboring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, or the purpose of exploitation. Exploitation includes, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labor or services, slavery or practices similar to slavery, servitude or the removal of organs. Consent is irrelevant where any of the means above are used. The recruitment, transportation, transfer, harboring or receipt of a child for the purpose of exploitation is considered “trafficking in persons” even if this does not involve any of the means above.

Unacceptable Conditions of Work – The [ILO](#) defines unacceptable conditions of work as those that “deny fundamental principles and rights at work, put at risk the lives, health, freedom, human dignity and security of workers or keep households in conditions of poverty.”

Unintended Consequences – Outcomes of a purposeful action that are not intended or foreseen. In this context, unintended consequences are assumed to be negative or harmful.



Visitors – anyone who visits a Grameen [workplace](#) or engages with or observes Beneficiaries. This includes journalists, donors, or other interested persons. When Visitors are informed of this Policy or Grameen’s Code of Conduct (ie. through signage posted or training instructions), Visitors are considered Related Personnel who must abide by this Policy and the Code.

Violence – An action (verbal, written, or physical aggression) which is intended to control or cause, or is capable of causing, death or injury to oneself or others, or damage to property. Violence includes any physical assault or battery; threats of violence (written, verbal or implied by conduct); other aggressive or hostile acts; fighting or intentionally damaging in Grameen's or another's property in the Workplace; and behavior that causes another person emotional distress or creates a reasonable fear of damage to property or injury, such as stalking.

Vulnerable Adult - is any person aged 18 or older who, due to physical or mental disability, illness, age-related conditions (whether diagnosed or not) is unable to protect themselves from harm, exploitation, abuse, or neglect.

Workplace – any location where the work or activities of Grameen are taking place (whether in a Grameen office or outside, e.g., in a hotel, workshop location, at a IP's place of business, etc.), as well as the immediate vicinity of any such location.

Annex 2 - Code of Conduct

Version 3 - Board Adopted February 2025

I. Introduction

Grameen, pursuant to its documents of incorporation, and within the confines of its bylaws, has a mission to enable the poor, especially women, to create a world without poverty and hunger. How Grameen performs its mission is as important as the mission itself. Grameen must at all times perform its operations in a manner that increases and shows integrity, accountability, responsibility and transparency.

To ensure the successful mission and protect the reputation of Grameen, it is imperative that those covered by this Code of Conduct (“**Code**”), engage in behavior that is ethically sound and legally compliant. Grameen’s reputation for integrity and excellence requires careful observance of the spirit and letter of all applicable laws and regulations and the avoidance of even the appearance of improper behavior or impropriety, as well as a scrupulous regard for the highest standards of conduct and personal integrity. The continued success of Grameen is dependent upon Grameen’s donors and partners’ trust and we are dedicated to preserving that trust. Those covered by this Code owe a duty to Grameen and its donors and partners to conduct all activities in a manner that will merit continued trust and confidence.

II. Scope:

This Code generally applies to:



- **Employees** include all full-time and part-time employees of Grameen branch offices, wherever located, and subsidiary organizations (under versions adopted by governing bodies); and
- **Related Personnel** includes non-Employee Grameen actors, including but not limited to board members, Contractors (independent contractors, consultants, vendors, volunteers, interns, fellows)¹⁸, visitors¹⁹, in addition to individual and corporate contractors of these entities and their personnel; and
- **Implementing Partners (“IPs”)** international or local organizations and institutions (public and private) who have contractual agreements (e.g. subaward or partnership agreements, or memoranda of understanding (MOUs)) with Grameen and are implementing or supporting Grameen’s activities.²⁰

Employees, Related Personnel, and IPs are referred to collectively as “Covered Parties”

III. Terms of the Code of Conduct

Covered Parties agree to be bound by this Code, whenever and wherever they are representing Grameen, when present at a Grameen [Workplace](#), whenever using Grameen facilities, equipment, or other resources, which may not be during usual business hours. Representing Grameen could include, but is not limited to, social activities where Covered Parties are discussing Grameen or when a person is wearing Grameen apparel.

Covered Parties in delivering services and in all other Grameen activities, agree to meet the Code of Conduct and shall:

1. Conduct business in accordance with the letter, spirit, and intent of all relevant laws and regulations.
2. Refrain from any illegal, dishonest, socially inappropriate or unethical activities.
3. Comply with all internal policies, procedures and directives, as informed or directed by the Covered Party’s contractual agreement with Grameen.
4. If a Covered Party's scope of work involves access to Grameen’s assets, preserve and protect Grameen’s assets, such as office spaces and equipment, and ensure their efficient and proper use. All Grameen assets must only be used for legitimate Grameen business and charitable purposes.

¹⁸ This Code applies to [Contractors](#) through their contractual agreements with Grameen, unless stipulated otherwise in their respective contractual agreement. Whether or not this Policy and the associated Code of Conduct apply shall be based on the individual’s or entity’s scope of work.. Whether or not Grameen’s Safeguarding Policy and Code apply shall be based on the individual’s or entity’s scope of work.

¹⁹ Visitors, including anyone who visits a Grameen [Workplace](#) or engages with or observes Beneficiaries, who are informed of Grameen’s Safeguarding Policy and Code (ie. through signage posted or training instructions), are considered Related Personnel who must abide by the Safeguarding Policy and Code of Conduct.

²⁰ IPs may follow their own safeguarding policy and code of conduct only when the policy and code meet the minimum standards set forth by Grameen’s Safeguarding Policy and Code. In any case, IPs remain obligated to report all allegations of violations of Grameen’s Code of Conduct to Grameen in accordance with this Policy (see Section IV Reporting).

5. Operate and behave in the best interests of Grameen.
6. Use good judgment, based on high ethical principles.
7. Read and acknowledge this Policy as requested by a contractual agreement with Grameen, or Grameen's HR Director or CEO.
8. Adhere to child safeguarding standards.

While this list is not comprehensive, all Covered Parties shall refrain from:

1. Taking actions that are NOT free of any consideration of personal gain (private benefit), including a financial advantage or a gain of other than nominal value. For Covered Parties, this means anything of value in excess of your duly negotiated compensation package or fee. Covered Parties must declare any financial, personal, family (or close intimate relationship) interest which may impact on the work of GFUSA.
2. Knowingly take any action or make any statement intended to influence the conduct of Grameen in such a way as to confer any financial benefit on any person, corporation or entity in which the Covered Party has a significant interest or affiliation (private increment).
3. Authorizing the use of the Grameen name or logo, Grameen funds, Grameen trademarks, services or property of Grameen for personal gain, or for the benefit or advantage of any person except in conformance with Grameen policy.
4. Publicly using Grameen affiliation in connection with the promotion of partisan politics, religious matters, or positions on any issues not in conformity with Grameen's charitable mission, vision, and beliefs.
5. Disclosing or using any confidential Grameen information that is available solely as a result of the affiliation with Grameen, to or with any person not authorized by Grameen to receive such information, or to use any Grameen information to the disadvantage of Grameen (Employees and applicable Related Personnel additionally see Grameen's Confidential Information Policy).
6. Operating or acting in a manner that creates a conflict with the interests of Grameen (Employees and applicable Related Personnel additionally see Grameen's Conflict of Interest Policy).
7. Engaging in sexual activity with children (persons under the age of 18), or engaging in sexual activity with any person, regardless of the age, in a non consensual way.



8. Engaging in sexual relationships with Beneficiaries, since these relationships would be based on inherently unequal power dynamics and would undermine the credibility and integrity of the work of Grameen.
9. Engaging in exploitation of child labor or labor that compromise the health, safety, mental and social development, and schooling of a child (Note: a Child is a person under the age of 18).
10. Engaging in any activities that may support or lead to slavery, servitude, forced and compulsory labor and human trafficking.

IV. Reporting

Covered Parties shall report actual or suspected violations of this Code, unethical conduct, illegal behavior, fraud, abuse or waste using the following feedback / reporting channels:

- Optionally anonymous “hotline” voicemail submission by calling (202)-517-6677
- Optionally anonymous “hotline” written submission via [SuggestionOx](#)
- Email, meeting or phone call with Grameen’s Legal team or HR Director, a supervisor, or a leadership team member.
- Email sent directly to complaints@grameenfoundation.org
- [Project Specific] Community-based complaints mechanism, to be determined in each country and on the basis of project need and budget, in partnership with IPs.

If a situation arises where the Covered Party is not sure if there is a violation of this Code or a Grameen Policy, the Covered Party should seek advice from Grameen’s Legal team or HR Director, who will prioritize confidentiality when dealing with inquiries.

If a person is not comfortable with the reporting channels above or has concerns about the behavior of the Legal team or HR Director, they can contact Grameen’s CEO or Board Chair.

Grameen strives to maintain an environment in which all persons connected with Grameen feel free to call attention to potential legal or policy violations. Grameen will investigate impartially all complaints and concerns in a professional manner. Grameen will not retaliate against any individual who submits a complaint in good faith, meaning the complaint was not made maliciously or knowingly false. In addition, Grameen has zero tolerance for retaliation against individuals who submit complaints or participate in investigations.

All Covered Parties are expected to reasonably cooperate in internal investigations of misconduct, and keep all such participation strictly confidential to protect the integrity of the investigation and privacy of all individuals involved.



V. Violations & Consequences

Violations

Grameen has a **zero tolerance** approach in regards to Code violations, which include:

8. Engaging in actual or suspected violations of this Code, unethical conduct, illegal behavior, fraud, abuse or waste; or
9. Failure to report actual or suspected violations of this Code according to Section IV; or
10. Retaliating against, intimidating, or threatening a reporter or person participating in an investigation; or
11. Intentional omission of information relevant to an investigation; or
12. Intentional destruction of documents (electronic or physical), information, or evidence, related to an investigation; or
13. Unauthorized use of Grameen resources to manipulate or impact an investigation; or
14. Reporting allegations that prove to have been made maliciously or knowingly to be false.

Consequences

Covered Parties who violate this Code are subject to discipline, up to and including termination of employment for Grameen Employees, unilateral termination of present engagements or agreements, or declining future business relations. If the failure to comply with this Code also violates or could be in violation of applicable law, Grameen may refer the conduct to relevant law enforcement authorities.

Contact HR or the Legal Department for more information or questions about the Code of Conduct.

