Habitat for Humanity®

Ethics Covenant

Habitat for Humanity's Code of Conduct

LETTER FROM HFHI'S CHIEF EXECUTIVE OFFICER

Our commitment to stewardship and integrity



"Our mission mandates that we uphold the highest of standards."

For more than 40 years, Habitat for Humanity has been bringing people together to create a world in which everyone has a decent place to live. We have made affordable shelter accessible to more than 13.2 million people. As we work toward increasing our impact, we are very mindful that we have been entrusted with an abundance of human, financial and spiritual resources. We have also been blessed with a name and reputation of great worth. At the cornerstone of our mission is the requirement that we are to serve with integrity and to be good stewards of these resources.

As Habitat for Humanity's achievements grow, so do our responsibilities and the attention we receive from the rest of the world. We are measured not just by the number of families we serve, but by the integrity and quality with which we serve them. In recognition of these facts, senior leaders have updated our Ethics Covenant to reflect the highest standards of individual and organizational conduct.

Our mission — and our commitment to demonstrate the love of Jesus Christ — mandates that we uphold the highest of standards. Misconduct and unethical behavior both damage the good name of Habitat and can hurt the very beneficiaries that we work so hard to serve. Furthermore, resources lost as a result of careless, unethical or noncompliant behavior often far outweigh the cost of making diligent efforts to do the right thing. So as I urge you to strive for personal excellence, I also remind you to reach out to management or MySafeWorkplace®, **our Ethics and Compliance Portal and anonymous reporting tool**, whenever you become aware of or suspect unethical or noncompliant behavior:

- **MySafeWorkplace.com**.
- Within the U.S., call toll-free (800) 461-9330.
- Outside of the U.S., call collect +1 (720) 514-4400 or obtain your local toll-free phone number from the **MySafeWorkplace® website**.

Our board of directors and management are committed to addressing all ethical concerns and to maintaining an environment in which good stewardship, ethics and compliance are among our highest priorities.

I am asking you to renew your commitment to be good stewards and to rededicate yourselves to upholding the highest ethical standards. Please join me in reaffirming our pledge to consistently represent Habitat with integrity, as we bring people together to build strength, stability and self-reliance through shelter.

Blessings,



Jonathan T.M. Reckford

Habitat for Humanity Ethics Covenant

The Habitat for Humanity Ethics Covenant is a promise made by all representatives that we will undertake our work while adhering to the highest standards of ethical conduct. Habitat for Humanity's mission statement announces our intention to bring people together to build homes, communities and hope. As individuals and as an organization, our conduct in the matters addressed in this covenant directly impacts our ability to unite people behind that mission.

Recognizing the importance of upholding the highest ethical standards, Habitat's senior leadership has incorporated international humanitarian standards, good business practices and the teachings and example of Jesus Christ in this ethics covenant. This covenant applies to all Habitat for Humanity board members, staff members, contractors, interns, AmeriCorps members, volunteers and suppliers. It is not meant to contradict other rules, policies, program-specific behavior standards or professional standards, but rather to make it easier to choose right actions.

Each of us is responsible for knowing and abiding by this covenant and by the laws, regulations and Habitat for Humanity policies that apply to our work. Supervisors have the added responsibility of setting a good example and overseeing the actions of their staff.

Laws and cultural norms vary in the countries where Habitat works, but ethical behavior goes beyond the minimal adherence to law. Habitat for Humanity strives to comply with the spirit as well as the letter of laws and regulations that may be applicable to our organization.

Your supervisor, the HFHI chief people officer, or CPO, and the HFHI vice president of internal audit are all available to help answer questions about this covenant. If the meaning of a law or regulation or how it should be applied to the particular situation is unclear to you, contact the HFHI Legal department.

HABITAT FOR HUMANITY REPRESENTATIVES SHALL:

- Respect and safeguard the rights and dignities of all people, and protect our staff, volunteers, beneficiaries and community members (especially children) from exploitation and abuse.
- Safeguard ministry assets.
- Treat all individuals fairly and according to Habitat for Humanity rules.
- Avoid or remove themselves from conflicts of interest.
- Fully comply with all laws and regulations.
- Create and maintain accurate records and reports.
- Protect confidential information and proprietary material.
- Speak up about any possible ethical violations.

ETHICS COVENANT

Habitat for Humanity Code of Conduct

As a Habitat for Humanity representative, I will:

1. Respect and safeguard the rights and dignities of all people, and protect our staff members, volunteers, beneficiaries and community members (especially children) from exploitation and abuse.

I will respect, promote and safeguard the rights and dignities of all people (with particular attention to beneficiaries and children) without discrimination or bullying of any kind.

I will treat all beneficiaries with respect, courtesy and dignity.

I will not engage in any abuse of authority, position or influence by withholding humanitarian assistance or manipulating selection or targeting processes for beneficiaries.

I will conduct myself in a manner consistent with the standards adopted by the United Nations to protect beneficiaries and community members (especially children) from sexual exploitation and abuse, particularly but not exclusively during humanitarian crises. Such activity constitutes gross misconduct and is therefore grounds for termination of employment. Consequently, I recognize the following standards and will support them in the course of my duties:

- I will never engage in sexual exploitation or abuse.
- I will never engage in sexual activity with a child (person under the age of 18) regardless of the age of majority or age of consent locally. Mistaken belief in the age of a child is not a defense.
- I will never exchange money, employment, goods or services, including assistance that is due to beneficiaries, for sex, sexual favors or other forms of humiliating, degrading or exploitative behavior.
- I will not engage in a sexual relationship with a beneficiary, since it is based on inherently unequal power dynamics and undermines the credibility and integrity of humanitarian aid work.
- If I develop concerns or suspicions regarding sexual abuse or exploitation by a fellow worker (whether a staff, contractor, volunteer or supplier of Habitat for Humanity or another humanitarian aid agency), I will report such concerns via established reporting protocols and the **MySafeWorkplace reporting tool**.
- I will help to create and maintain an environment that prevents sexual exploitation and abuse, safeguards the rights of beneficiaries and community members (especially children), and promotes the implementation of Habitat for Humanity's code of conduct. (*Note: Managers at all levels have particular responsibilities to support and develop systems that maintain this environment.*)

2. Safeguard ministry assets.

I am responsible for safeguarding all ministry assets under my control and for providing accurate, auditable records of those assets, including cash where applicable. I will use reasonable care to protect and safeguard all Habitat for Humanity assets entrusted to me, using at least the same care I would use to protect my own personal assets under similar circumstances.

I will use Habitat assets only for business-related purposes and in the best interest of Habitat for Humanity. I will not steal, misappropriate or divert Habitat funds, property or other assets for my personal benefit or otherwise engage in any fraudulent activity involving Habitat's operations.

I am responsible for the careful, cost-conscious and effective use of all Habitat funds, including those for travel and entertainment. When using Habitat for Humanity expense accounts, I will charge or request reimbursement only for expenses that are allowable under Habitat policy and will fully and clearly document all expenses.

I will not remove any Habitat equipment without prior permission. Regardless of its current usage or condition, I will not sell, loan, give away or otherwise dispose of Habitat property without proper authorization consistent with applicable procedures.

3. Treat all Habitat donors, colleagues, volunteers, contractors, beneficiaries, partners and suppliers with fairness and in accordance with Habitat for Humanity rules.

I will treat all Habitat donors, colleagues, volunteers, contractors, beneficiaries, partners and suppliers with integrity, respect and fairness. Consequently, in my Habitat work, I will not:

- Make promises that are not allowed by Habitat business rules or other policies.
- Include any intentional misrepresentations.
- Offer benefits or rewards in violation of laws, regulations or generally accepted business practices.

I will choose contractors and suppliers and make purchasing decisions in a manner that is consistent with this covenant and with Habitat's procurement policies, which require making ethical decisions on the basis of price, quality, quantity, delivery or services.

4. Avoid potential conflicts of interest and avoid or remove myself from any actual conflicts of interest.

An actual or potential conflict of interest occurs when someone is in a position to influence a decision that may result in a direct or indirect gain to themselves, a relative or a close personal friend as the result of Habitat's ministry.

If I cannot avoid a conflict or otherwise resolve it, then I will remove myself from the conflict situation.

Without prior approval from my supervisor, I will not engage in any business transaction on behalf of Habitat with anyone to whom I am related or with a business where a relative is a principal officer, decision-maker or financial beneficiary.

If I use company suppliers or contractors for personal business, I will personally pay full market value for services rendered and materials provided.

I will not accept payment from another organization or individual for doing work that Habitat pays me to do in the course of my employment. For example, if I am offered an honorarium or fee — either money or a gift — for delivering a presentation about Habitat, I will either tactfully decline it or have it paid to Habitat.

I will obtain my supervisor's approval before agreeing to serve on Habitat for Humanity's behalf on an outside board of directors. Approval must then be reported through the protocols established in the Conflict of Interest Policy (e.g., to HFHI's chief financial officer). I will then either decline any fees for outside board service or have them paid to Habitat.

Business gifts

Business-related gifts (including services, discounts, entertainment, travel, meals, promotional materials or samples) present situations that are inherently compromising. I will examine each situation with a bias against the gift.

Neither I nor members of my immediate family will accept gifts from an actual or potential Habitat customer, supplier, business or other professional partner, unless the following conditions are met:

- The gift is sent to the workplace, not my home.
- The gift is occasional and valued at no more than $50 or, if valued at more than $50, the gift is made available in a team space or common area for others to share (e.g., fruit baskets, boxes of candy).

Meals and other business entertainments are subject to the same standard: They must be modest, infrequent and, as far as possible, on a reciprocal basis.

Outside financial interests and jobs (applicable to Habitat staff only)

I will not engage in any outside activity that interferes with or influences the performance of my Habitat duties, divides my loyalty, allows for a possible conflict of interest, or results in a situation involving double compensation.

I will not engage in outside business activities such as simultaneous employment, financial interests (including business ownership) and service on public bodies unless all of the following conditions are met:

- The relationship between the business activity and my work at Habitat is inconsequential.
- My ownership and participation in the business is not related to my work at Habitat.
- No competitive or other commercial relationship exists between the outside business concern and Habitat.

Neither I nor my immediate family will have an ownership or other significant financial interest in or be employed by any Habitat supplier, contractor, customer or competitor without prior full disclosure using the process established in Habitat's Conflict of Interest Policy.

Similarly, I will not seek to enter Habitat in any transaction with a business in which a current staff has any such financial relationship without prior full disclosure using the process established in Habitat's Conflict of Interest Policy.

I will endeavor to render my best efforts to Habitat for Humanity's ministry and will not engage in any outside business interest or employment that diverts my attention from my Habitat responsibilities or that otherwise acts to the detriment of the organization.

I will be familiar with Habitat's Conflict of Interest Policy and will consult with my supervisor and Legal to clarify and resolve any conflicts that might arise.

5. Perform my duties in full compliance with all applicable laws and regulations.

Not-for-profit status

I will help protect Habitat for Humanity's status as a not-for-profit organization with tax-exempt status by not using Habitat assets to endorse political candidates, mobilize supporters to elect or defeat candidates, or align Habitat with political parties. (Note: In consultation with HFHI advocacy staff, communication with government officials and the general public about positions on legislation is permissible as long as government funds are not used.)

When I participate in personal political activity or make political contributions, I will make clear that I am acting on my own behalf and not on behalf of Habitat.

Anti-corruption and other business activities

Corrupt payments undermine the fairness and integrity of the work and dealings of Habitat and potentially violate multiple laws. I will never accept, give or facilitate any bribes, kickbacks, extraordinary commissions and other unusual payments. This includes improperly covering or reimbursing expenses.

I will avoid all actions that could be construed as being anti-competitive, monopolistic or otherwise contrary to competitive practices in the marketplace. For example, I will not involve Habitat in unfair competition, price-fixing or bid-rigging arrangements; unacceptable exclusive dealings; or any other illegal marketplace practices.

Some of the most common fair trade questions arise in the context of marketing, sales or purchasing responsibilities; discussions with competitors; and attendance at trade or professional association meetings. If I am unclear about

whether a specific activity is in violation of antitrust or other fair trade laws, I will talk with my supervisor or Habitat's legal counsel.

I will not knowingly participate in any acts that violate any applicable law, rule or regulation of any government, governmental agency or regulatory body.

6. Create and maintain accurate records and reports.

I will keep accurate, auditable records of all Habitat for Humanity transactions in accordance with applicable accounting principles. I will never make entries or create any supporting documentation to intentionally hide or disguise the true nature of any transaction or to create funds to be used for other purposes.

I will use best efforts to ensure that any information that I record and submit to other parties — whether inside or outside Habitat — will be accurate, timely and complete. I will never create or use a report (financial or nonfinancial) to mislead those who receive them or to conceal anything.

I will maintain records according to Habitat for Humanity's records management policy and the records retention schedule.

7. Protect confidential information and proprietary material.

I will protect Habitat's confidential information. Confidential information is information that is not generally known outside of an organization and is not known by public means. It includes financial reports, board reports, donor information, personnel information and vendor bids in any format (digital or print). Confidential information may also include information provided to Habitat by another party pursuant to a confidentiality/ nondisclosure agreement. This includes the personal information of donors, staff members, volunteers and beneficiaries, which I understand may be protected by law and may not be shared inappropriately.

Unless I receive prior approval, I will not disclose confidential Habitat for Humanity information, even if it does not put Habitat at a competitive disadvantage. Likewise, I will respect the confidentiality of information given to me in confidence by others.

If it is necessary to receive or disclose confidential information in the context of a specific business transaction, I will discuss the situation with my supervisor and, as appropriate, with Habitat's legal counsel.

Apart from legally recognized "fair uses" of proprietary material such as copyrights and trademarks, I will not use proprietary material without permission of the owner. This includes unauthorized duplication of computer software and making multiple copies of a publication when only a single copy has been purchased.

If I become aware of breaches or leaks of confidential or personal information, I will immediately inform my manager and the appropriate Habitat IT staff.

8. Speak up about any possible ethical violations.

See something, say something

I will report possible violations of this covenant to my supervisor, my designated Habitat representative (e.g., the HFHI CPO or the HFHI vice president of internal audit), or anonymously through the **MySafeWorkplace reporting tool**.

Similarly, I will make a report if I become aware of potential fraud or unethical behavior; if I am aware of a situation where a possible conflict of interest may exist with myself or another colleague; or if I believe that, as a matter of

conscience, I cannot do something that I am asked to do. I recognize that being aware of potential misconduct but failing to report such behavior is also considered misconduct and can be grounds for disciplinary action.

The reporting required by this covenant does not negate or replace my reporting obligations under associated Habitat for Humanity policies, such as policies regarding whistleblowing, fraud, harassment, bullying and discrimination, and conflict of interest.

If I am a supervisor, rather than investigating myself, I will report all complaints to my designated Habitat representative, (e.g., the HFHI CPO or the HFHI vice president of internal audit), so that any inquiries can be handled appropriately and any emerging patterns of unethical behavior or any recurring situations that pose ethical dilemmas can be identified.

Commitment to nonretaliation

If you raise questions or suspicions regarding violations of this covenant in good faith, you will not lose your job or suffer harassment, retaliation or adverse employment consequences.

Conversely, you will be subject to disciplinary action, up to and including termination and legal action if you:

- Retaliate against a colleague for reporting a concern or cooperating in a formal inquiry.
- Maliciously and falsely report misconduct.
- Violate the law or Habitat for Humanity policies.
- Deliberately withhold information during an ethics investigation.

Acknowledgment of the Ethics Covenant

This form is to be completed and signed by every Habitat for Humanity International board member, staff member, AmeriCorps member, intern, contractor, volunteer and supplier at the beginning of service or employment. In addition, this covenant should be reviewed and acknowledged by staff members as part of the annual planning process.

1. I acknowledge that I have received a copy of the Habitat for Humanity Ethics Covenant ("Covenant") dated October 2018.
    a. I understand that it is my responsibility to read and comply with the Covenant and any revision made to it.
    b. I understand that:
        i. I am subject to the Covenant and am required to comply with it.
        ii. Any staff members under my supervision are also subject to the Covenant, and I am responsible for communicating and interpreting the Covenant to those staff members (with the understanding that I am encouraged to seek assistance from Human Resources, Internal Audit and Legal).
        iii. I am responsible for reporting any possible misconduct, conflict of interest or unethical behavior that involves me, that is reported to me, or that I observe.
        iv. I am responsible for reporting any complaints that I receive under the Covenant reporting provisions and any other violations of the Covenant that I observe.
2. I certify that, to the best of my knowledge, I am in full compliance with the Covenant except as previously reported in writing to the CPO and the vice president of internal audit or as follows:

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_____

_____

Name (please print)	**Title**
Signature	**Date**

every hand

makes a difference

Habitat for Humanity®

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