

Principles Relating to Responsible Conduct



How We Apply Our Code of Ethics, Governance, and Responsibility

PATH has established principles relating to responsible conduct in governance, workforce environment, research, collaboration, financial stewardship, intellectual property and confidential information, conflict of interest, communications, advocacy, and the environment. These principles guide our work in accordance with our Code of Ethics, Governance, and Responsibility.

Governance

In all aspects of our work, PATH adopts applicable and good-practice governance rules and principles. These include both the United States and other countries' rules regarding how nonprofit organizations are organized, how they are governed, and how they conduct their affairs. PATH strives for robust decision-making, transparency, and reporting for the legal entities we have established to conduct our operations.

PATH is committed to gender equity; geographic, ethnic, and racial diversity; and inclusion of people with disabilities in the composition of our board.

PATH adheres to government regulations and legal requirements for the locations in which we work. Relevant laws include federal laws such as the US Internal Revenue Service Code, state corporation laws, and country-specific regulatory laws that impact how we are structured, are governed, operate, and report to governmental authorities in particular jurisdictions.

To ensure accountability and transparency, the boards governing PATH and our affiliated organizations meet regularly and follow applicable laws and bylaws established to conduct our affairs. We have established internal governance and authorization policies and procedures that provide a foundation for this work, including the conflict of interest policies described below. We also strive to follow evolving best practices for governance.

Workforce Environment

PATH is committed to a work environment in which all employees are treated equally, fairly, and with respect and dignity. Each employee has the right to work in a professional

atmosphere that abides by all applicable labor and wage laws and that promotes equal employment opportunities and prohibits discriminatory practices, including harassment. PATH expects that all relationships among persons in the workplace will be lawful, professional, respectful, and free of bias, prejudice, and harassment.

To ensure accountability and transparency, PATH has established internal policies and procedures that provide clear direction regarding labor and wage practices, diversity, harassment, and professional conduct. We follow local laws and regulations regarding these areas and strive to follow evolving best practices.

PATH's HR Business Partners are trained to identify and address these issues, should they arise in the workplace. PATH values its employees and, in order to fulfill its duty of care, endeavors to protect their health, safety, and security against any reasonably foreseeable dangers in the workplace. PATH will take practical steps in order to fulfill its duty of care for employees whenever they are at work, including while they are in PATH offices and when they are traveling. More information can be found on the Policy Portal and on the [Global Facilities, Travel, and Security SharePoint site](#).

PATH's responsibility to protect employees' health, safety, and security in the workplace against reasonably foreseeable dangers includes safeguarding harms. PATH defines safeguarding as the prevention of, and response to, harms like sexual exploitation and abuse (SEA), harassment, discrimination, trafficking in persons, and workplace bullying within PATH or against anyone who comes into contact with PATH. PATH has policies and procedures addressing each of these topics.

PATH strictly prohibits discrimination and all forms of unlawful harassment, including sexual harassment, based on any legally protected class. Our [Harassment and Retaliation policy](#) outlines definitions, examples of prohibited behavior, and reporting mechanisms.

PATH's [Protection from Sexual Exploitation and Abuse \(PSEA\) and Child Safeguarding policy](#) describes PATH's commitment to deterring all activities that would facilitate or condone sexual abuse and exploitation and, particularly, sexual exploitation, abuse or neglect of children and vulnerable adults who are served by PATH programs or who come into contact with PATH personnel implementing those programs. PATH prohibits and has a zero-tolerance policy on any child or vulnerable adult abuse, exploitation, or neglect.

PATH is opposed to all forms of trafficking in persons and is committed to mitigating the risk of trafficking in persons in connection with our operations, personnel, and programs. PATH has adopted a [Trafficking in Persons policy](#) that prohibits trafficking in persons, procurement of commercial sex acts, and using forced labor. Any personnel who violate PATH's safeguarding policies are subject to disciplinary action, up to and including immediate termination of employment or contract.

PATH is committed to prohibiting retaliation against those who report incidents of alleged safeguarding harms in good faith.

Ethical Conduct of Research

PATH is committed to rigorously designing and carefully implementing research that meets or exceeds national and international ethical standards. Whether we work independently or in collaboration with other groups, we strive to ensure the ethical conduct of research.

PATH maintains a committee charged with determining which data-collection activities fall under the US government's definition of research. PATH maintains an institutional review board under a federal-wide agreement with the US government and requires that all PATH's human subjects research is reviewed by an institutional review board. All of PATH's human subjects research must undergo a separate review for scientific merit.

PATH human subjects research performed outside of the United States requires ethical review in the country where the research takes place and must follow all in-country research requirements. All research performed by third parties under contract to PATH must adhere to this requirement. In addition, PATH laboratory research that involves recombinant DNA requires review by an institutional biosafety committee.

PATH is committed to ensuring that the clinical trials which we fund, conduct, or otherwise support, are registered in a publicly available clinical trial registry in accordance with international standards established by the WHO. PATH is likewise committed to ensuring that the results of these trials are made publicly available within 12 months of primary study completion. PATH monitors our commitment to these principles on an annual basis.

PATH requires its senior leaders and all staff with oversight or involvement in research projects to maintain current research ethics training certification. In addition, PATH expects all staff and consultants who conduct research for PATH to observe the highest standards of scientific integrity. PATH's policy on scientific integrity includes administrative processes to ensure that any allegations of research misconduct are reviewed and, if appropriate, investigated and reported.

Collaboration with Donors and Partners

PATH succeeds through partnerships marked by a respect for people, cultures, and ideas. This collaborative approach

is embedded in our relationships with those who grant us funds for restricted or unrestricted purposes, as well as those with whom we partner to implement our work.

In engaging partners to carry out our work, we seek qualified, mission-consistent organizations, individual philanthropists, and family foundations well suited to the work at hand. Among potential nonprofit partners and individual partners, we seek collaborators that have values consistent with our own and a track record of success in advancing their own missions. Among potential private-sector donors, we seek collaborators willing to apply their development, manufacturing, and distribution strengths toward technologies that will benefit the low-resource populations we serve. We developed *PATH's Guiding Principles for Private Sector Collaboration* to describe how we engage the private sector to achieve maximum, sustainable benefits in global health. We also operate a Corporate Contributions Review Committee to inform PATH's strategy for working with the corporate sector and to review current and prospective corporate contributions.

Additionally, PATH has adopted the Code of Ethics from the Association of Fundraising Executives as a set of guiding principles as we engage individuals, corporations, and family foundations in support of PATH's mission.

Financial Stewardship

PATH has adopted policies that enable us to be good stewards of funds we receive. We abide by institutional funders' rules, regulations, and guidelines, and we strive for the best stewardship of individual donors' valued donations. We uphold applicable financial standards and principles in all aspects of our work. These include Generally Accepted Accounting Principles and standards defined by the Financial Accounting Standards Board, the International Accounting Standards Board, and the Governmental Accounting Standards Board. We also uphold internal accounting policies that provide a foundation for this work.

PATH adheres to state, federal, and international regulations and legal requirements for the locations in which we work. Relevant US government regulations include the Internal Revenue Service Code, Code of Federal Regulations, Federal Acquisition Regulations, Office of Management & Budget Uniform Guidance under Title 2 of the Code of Federal Regulations Section 200, the Foreign Corrupt Practices Act, and the Patriot Act. We also abide by relevant state laws and country-specific regulatory and tax laws.

To ensure accountability and transparency, we perform external audits, internal audits, and third-party audits and reviews. We uphold our fiduciary responsibilities through our donor policies, investment policies, and oversight of employee pension assets. We take particular care with institutional, for-profit donors to create arms-length arrangements and avoid inappropriate quid pro quo transactions. Finally, we have developed and maintain policies—including procurement policies, travel policies, and accounting policies—that are intended to ensure ethical procurement of goods and services.

PATH strives to detect, prevent, and correct wrongdoing that violates federal, state, or local laws with regard to corruption, fraudulent billing and financial reporting, or other wrongdoing or unethical conduct. PATH has a whistleblower policy and maintains an anonymous reporting option through a third-party compliance vendor to further enable reporting regarding allegations of misconduct or impropriety.

Protection of Intellectual Property and Confidential Information

Intellectual property includes patents, copyrights, trademarks, trade secrets, and confidential information (including business, financial, technical, or other proprietary data) and any other form of legal protection for intellectual creations.

PATH views managing intellectual property as an important means of advancing our mission. We also recognize the importance of intellectual property to our partners, and we seek to determine an intellectual property management approach that will ensure that global health goals are met while critical intellectual property is protected. PATH's publication [Maximizing the Benefits of Public-Private Partnerships](#) details how we use intellectual property as a vehicle to achieve our mission.

PATH creates intellectual property alone or in collaboration with our partners, receives confidential information, and licenses or acquires intellectual property from other parties. We have policies to ensure that we properly protect intellectual property, whether it belongs to PATH or a third party. PATH complies with the laws and regulations that govern the rights of our own and others' intellectual property. We expect our employees, directors, and those with whom we work to respect both PATH and third-party confidential and proprietary nonpublic information and to use it only for PATH business and not for personal advantage. In addition, PATH expects confidentiality to be maintained after an employee, director, consultant, or collaborator is no longer employed or working with PATH.

Conflict of Interest

Understanding and managing bias and conflict of interest are important and ongoing responsibilities for PATH. On local, national, and international levels, awareness and sensitivity regarding bias and conflict of interest are increasing across a range of areas, from research involving human subjects to technology-development collaborations with private companies.

At PATH, "conflict of interest" refers to situations in which financial or other interests or duties may compromise or have the appearance of compromising objective judgment or fulfillment of professional duties. Individual conflict of interest may exist when an individual's financial or other interests create (or appear to create) a competing interest for the individual. Institutional or organizational conflicts of interest may exist when the financial interests of the

organization affect (or reasonably appear to affect) PATH's processes or decisions.

PATH works to ensure that our commitment to integrity will not be compromised by competing personal or institutional interests or obligations. We therefore strive for maximum transparency in our business arrangements for our products and program activities, and we monitor our business arrangements to avoid institutional conflicts of interest and to restructure arrangements if necessary.

PATH requires employees, investigators, and board members to abide by gift and anti-kickback policies and to disclose financial and other interests that may pose actual or perceived conflicts of interest. PATH works to eliminate or manage any conflicts of interest that arise from such disclosures. We developed [PATH's Guiding Principles for Managing Conflict of Interest](#) as a guide for staff and collaborators, and we have implemented a procurement policy in which conflicts of interest are disclosed and addressed.

US Public Health Service regulations set standards to ensure that the design, conduct, and reporting of research funded under the service's grants, cooperative agreements, and contracts will not be biased by any conflicting financial interest of participating investigators. Accordingly, all PATH investigators working on research projects funded by the National Institutes of Health or Centers for Disease Control and Prevention are guided by the *PATH Investigator Conflict of Interest Policy*.

Communications

PATH believes that providing accurate and timely information about our work is an inherent component of successful collaboration. We strive to ensure transparency and effectively communicate the results of our programs to relevant partners, supporters, and stakeholders, and we abide by the Public Relations Society of America Member Code of Ethics.

On the project level, we encourage staff to share project results, particularly among global health audiences. Because our collaborations may involve proprietary information, we strive to balance global health goals with our partners' needs to protect business-sensitive information. We therefore work with our partners to proactively define issues related to proprietary or confidential information in our contractual agreements.

On the organizational level, we develop corporate communications such as annual reports, the PATH website, and newsletters and engage with the media to share information about PATH's programmatic, financial, and business operations. We also provide services to all PATH staff to facilitate effective communications and the development of user-centered materials. To ensure accuracy and completeness of the resulting materials, we maintain a document approval policy that requires technical and leadership review of PATH materials.

Advocacy

PATH advocates for policies and resource commitments that address global health priorities. We support coalitions, provide evidence, and strengthen legislation and policies that advance health solutions that are most likely to achieve sustainable improvements in global health, whether or not they have been developed by PATH. The goal of this work is to create a policy environment that supports good health, particularly among the world's most vulnerable populations.

Throughout our advocacy efforts, we abide by all federal regulations pertaining to our status as a 501(c)(3) organization, and we comply with funder restrictions. In particular, we comply with all funder restrictions on the use of grant funds for lobbying, and we do not participate in any political campaigns on behalf of (or in opposition to) any candidate for public office.

Environment

PATH is aware of the growing body of data on the impact of environmental degradation and climate change on our planet, particularly in the developing world. We recognize the

importance of individual and organizational environmental responsibility in reducing this impact.

Our work to develop, introduce, and integrate health technologies includes efforts that protect communities and their environments from the risks associated with medical waste and minimize the volume of contaminated waste that must be managed.

To reduce PATH's organizational environmental impact, PATH operates the Green PATH initiative, which guides staff in reducing energy consumption, reducing paper consumption, reducing the generation of nonrecyclable waste, increasing recycling, and reducing our carbon footprint.

PATH also considers environmental impact when designing and siting new facilities. For example, PATH's offices in [Seattle](#) and [Washington, DC](#), are located in buildings certified to the Leadership in Energy & Environmental Design (LEED) [Gold](#) and [Platinum](#) standards established by the US Green Building Council.



PATH is a global nonprofit dedicated to achieving health equity. With more than 40 years of experience forging multisector partnerships, and with expertise in science, economics, technology, advocacy, and dozens of other specialties, PATH develops and scales up innovative solutions to the world's most pressing health challenges.

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