

PATH Conduct Commitments

PATH is committed to the highest standards for how we treat our staff and expect them to hold the same high standards in how they treat each other and the world around them. To guide us, we adhere to principles for responsible conduct in governance, employee interactions, research, collaboration, financial stewardship, intellectual property and confidential information, conflict of interest, communications, advocacy, and the environment. We have also developed and implemented policies on harassment and retaliation, workplace bullying, safeguarding, and trafficking in persons. These principles and policies are reinforced by our [Code of Ethics, Governance, and Responsibility, Principles Relating to Responsible Conduct](#), and our organizational [values](#).

Allegations Management and Reporting

PATH takes all allegations of policy violations seriously. PATH's Investigations Response Team, a group composed of representatives across legal, human resources, finance, internal audit, communications, and awards management, is responsible for managing inquiries and investigations prompted by allegations of misconduct. Final determinations and actions are made based on available evidence, and complainants are informed of high-level investigation outcomes, to the extent feasible and appropriate, while maintaining standards of confidentiality.

PATH's first priority in addressing alleged misconduct is the safety of complainants, witnesses, and program participants. The details of inquiries and investigations are confidential (unless disclosure is required by law) to ensure the privacy and safety of complainants, involved employees, and program participants, and to guard against retaliation.

PATH encourages anyone who is witness to possible violations to file a complaint. If you, as a PATH employee, are subjected to or observe potential wrongdoing in violation of PATH's policies, you must report it immediately using one of the options below:

- **PATH staff** may report concerns to their Human Resources Business Partner or to any Human Resources Business Partner, Human Resources Director, PATH's Chief People and Diversity Officer, or General Counsel.

- **Anyone** may contact PATH's compliance hotline to report concerns. The hotline is maintained by an independent, third-party provider that allows anyone to report allegations. To report concerns worldwide, go to the reporting website found at <https://path.ethicspoint.com>. Individuals based in the US can also report concerns by accessing a hotline phone number that has been set up specifically for PATH at 1-888-309-1559.

PATH does not tolerate retaliation for filing a complaint or participating in an investigation. If you are an employee of PATH and feel you are being retaliated against, or observe retaliation, please contact your Human Resources Business Partner or any Human Resources Director. All complaints will be managed in a prompt and discreet manner.

2021 Report

Based on allegations received, PATH investigated 44 allegations in 2021, the majority of which pertained to the following policies, procedures, and practices: conflict of interest; consultant agreements; fraud, corruption, and dishonesty; harassment and retaliation; personal conduct; recruitment and hiring; violation of PATH financial policies and procedures; and workplace bullying.

Of the 44 allegations investigated, the findings confirmed 23 violations of policy: 2 consultant agreements; 4 PATH financial policies and procedures; 3 fraud, corruption, and dishonesty; 6 harassment and retaliation; 3 personal conduct; 1 recruitment and hiring practices; 1 subaward agreement terms; 1 timekeeping; and 2 workplace bullying. In response to these findings, PATH took several corrective actions, including terminating the employment of one employee and accepting the resignations of two others. In addition to these corrective actions, PATH took other disciplinary measures, in some cases paired with retraining of management and staff and revisions to or additions of new policies.

We also believe in the importance of creating an environment where both our policies and our reporting mechanisms are well understood and accessible. PATH continues to develop and improve resources to raise awareness of these systems, build trust in our reporting processes, and allay fears or

anxieties potential reporters of misconduct may have about raising concerns.

Each year, we take steps to invest further in this important work. In 2021, PATH further improved the allegations management process, introducing additional investigative capacity and strengthening corrective action planning following investigations. To achieve a deeper, more robust alignment with our mission, values, Code of Ethics, strategy, sector and donor standards, and role as a signer on [InterAction's CEO Pledge on Preventing Sexual Abuse, Exploitation, and Harassment by and of NGO Staff](#), we built on our existing safeguarding policies to develop a broader safeguarding framework for the organization that addresses the prevention of, and response to, harms like sexual

exploitation and abuse, trafficking in persons, harassment, discrimination, and workplace bullying occurring within PATH or against anyone who comes into contact with PATH. As part of this framework, we introduced a required all-staff training and established Safeguarding Focal Points across the organization. Finally, to support multiple compliance priorities at the organization, we introduced heightened attention to successful completion of PATH's mandatory trainings by all staff.

Achieving and sustaining a work culture in line with PATH's principles and values requires all of us. Reporting incidents of potential policy violations and/or misconduct supports PATH's ability to continue its mission of advancing health equity.