



THE WHITE  
RIBBON  
ALLIANCE

HEALTHY WOMEN  
HEALTHY WORLD

## White Ribbon Alliance Global Code of Conduct

Our Commitment to an Inclusive and Respectful Workplace Culture:  
Anti-Discrimination, Harassment, Sexual Exploitation and Abuse

**Effective Date:** September 1, 2020

**Required Parties:** Global Secretariat Board of Directors, Employees, Interns, Volunteers  
National Alliance and Secretariat Board of Directors, Employees, Interns, Volunteers  
Subrecipients, partners, vendors, suppliers, consultants and others whom we exchange assets in exchange for services or products (collectively “Partners”)  
White Ribbon Alliance Members

**Governing Party:** National Alliance Council

### Purpose and Description

White Ribbon Alliance is a global movement grounded in human rights. Together we work to activate justice, equity and access without exception and celebrate the voices of all people. We believe that a respectful and inclusive workplace is built with diversity of people and ideas and is essential for the movement to thrive. We are committed to holding ourselves and all those we work with accountable to behavior that supports this. We recognize that the laws of nations are unique to individual countries, contexts and norms. This Code of Conduct outlines what White Ribbon Alliance considers the minimum standards for tolerance, anti-discrimination and harassment applicable to all parties that are part of White Ribbon Alliance, as outlined above.

White Ribbon Alliance will not tolerate harassment or discrimination based on race, color, religion, national origin, gender, gender expression, gender identity, sexual orientation, sex, (including pregnancy, childbirth, breastfeeding, and correlated medical conditions), ancestry, age, physical or mental disability (including HIV/AIDS), veteran status, familial status, status as a survivor of domestic violence, sexual assault or stalking, or any other status protected by applicable law. White Ribbon Alliance also will not tolerate retaliation, abuse of authority or bullying. This applies to conduct both in the workplace and in work-related settings, in-person and virtually.



Everyone at White Ribbon Alliance is entitled to a safe, professional environment and to be treated with dignity and respect. We strive to address and correct behavior that may violate this Global Code of Conduct before that behavior becomes severe or pervasive. We cannot do that unless we know about the behavior. Therefore, we strongly encourage all White Ribbon Alliance staff to report behavior they believe may violate this Global Code of Conduct.

Across White Ribbon Alliance certain individuals are required by their role to act with the Duty of Care, including members of any White Ribbon Alliance Board of Directors or governing bodies, Executive Directors, National Coordinators and the Senior Management Team of the Global Secretariat. These individuals are required to report behavior that they reasonably suspect or believe to violate the Code of Conduct as outlined here.

White Ribbon Alliance will support its staff if they are the target of behavior that may violate this Code of Conduct no matter where in the world that behavior occurs, and no matter who is accused of the behavior, even if the accused is employed by an entity other than White Ribbon Alliance.

This document describes the type of behavior that may violate a respectful and inclusive workplace, how employees can report that behavior, and the organization's procedures for investigating and responding to that behavior.

**It is required that any member of a White Ribbon Alliance Board of Directors, National Alliance Council or employee return a signed Acknowledgement and Commitment Form to uphold our commitments to each other and our shared values. Acknowledgement and adherence to our Global Code of Conduct will be upheld under the oversight of the National Alliance Council and may include employee disciplinary action, affiliation status, eligibility for funding from the Global Secretariat for National Alliances, and/or termination of contract (for vendors).**



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## Introduction

White Ribbon Alliance will not tolerate discrimination, harassment, abuse of authority, or bullying of employees. White Ribbon Alliance absolutely prohibits retaliation against any person who, in good faith, reports a possible violation of this Global Code of Conduct or participates in an investigation into such behavior.

Discrimination, harassment, retaliation, abuse of authority and bullying violate White Ribbon Alliance's values as an organization and threaten our credibility as an organization. They are unacceptable in the workplace itself and in other work-related settings such as business trips, Board meetings, social events and similar situations connected with work. Such behavior is also prohibited whether it is conducted in person or virtually. Everyone at White Ribbon Alliance is entitled to work in a safe, professional environment and to be treated with dignity and respect.

All of us are responsible for creating an environment free of harassment, discrimination, retaliation, abuse of authority, and bullying. No employee or Board Member is exempt from the requirements of this Global Code of Conduct, regardless of their position in the organization.

The Global Code of Conduct applies to White Ribbon Alliance Global and National Secretariat staff and Board or governing body members. It also applies to any other individuals who have a relationship with White Ribbon Alliance that enables the organization to exercise some level of control over that person's conduct in places and activities that relate to our work. This includes staff employed by any White Ribbon Alliance affiliate, outside vendors, donors, consultants, contractors, and others. We do not tolerate behavior that violates Code of Conduct whether it is committed by employees against non-employees, or by non-employees against employees.

White Ribbon Alliance will support its staff if they are the Target of behavior that may violate this Global Code of Conduct no matter where in the world that behavior occurs, and no matter who is accused of the behavior. An employee who believes they are the Target of behavior that may violate this Global Code of Conduct is encouraged to report that behavior, even if the Accused is employed by an entity other than White Ribbon Alliance. Once White Ribbon Alliance receives that report, the organization will investigate and coordinate with the entity that employs the Accused. As in any situation in which an White Ribbon Alliance staff member is a Target, when a complaint involves an individual from an entity other than White Ribbon Alliance, White Ribbon Alliance's priority will be (a) to support the White Ribbon Alliance staff member and (b) to ensure the behavior stops and does not reoccur.

White Ribbon Alliance will investigate every complaint promptly and thoroughly. Any violation of this Global Code of Conduct will be treated with utmost seriousness whether it is a singular incident or a pattern of behavior.



This Global Code of Conduct must not be used as a basis for excluding or separating individuals of a particular gender, or any other protected characteristic, from participating in business or work-related activities or discussions in order to avoid allegations of discrimination, harassment, retaliation, abuse of authority, or bullying.

## Definitions

In this Global Code of Conduct, the following terms apply:

- **Accused:** An individual accused of behavior that may violate this Global Code of Conduct.
- **Target:** An individual who experiences behavior that may violate this Global Code of Conduct.
- **Employee(s):** For the purposes of this Code of Conduct, we define employees as any Individual(s) employed by White Ribbon Alliance in any location, and individuals who are employed by WRA National Secretariat host organization and/or national affiliates whose work is in support of WRA, including permanent, temporary, full- and part-time positions, and interns.
- **Investigator:** The Director of Operations at the Global Secretariat will serve as the primary investigator for all complaints. As appropriate, the Chief Executive Officer, Board of Directors or National Alliance Council may appoint an alternative, qualified investigator as appropriate.
- **Organization:** White Ribbon Alliance Global Secretariat, National Secretariats, National Alliances, Sub-national Alliances and others whose relationship falls under the governance model and authority of the global movement.
- **Partner(s):** Members, subrecipients, partners, vendors, suppliers, consultants and others whom White Ribbon Alliance exchanges assets in exchange for services or products.
- **Duty of Care:** The responsibility of members of any Board of Directors, or governing body and Executives including Executive Directors, National Coordinators and members of the Global Secretariat Senior Management Team to be informed on areas that would threaten the organization or those in it, and take action that a reasonable person would consider to be in best interest of the organization as a result.
- **Discrimination:** The treatment of one individual differently than another because of that individual's membership in, or affiliation with, a protected category, or that of the individual's relatives, friends, or associates.
- **Harassment:** Conduct that denigrates or shows hostility or aversion toward an individual because of that person's membership in, or affiliation with, a protected category, or that of the individual's relatives, friends, or associates, and that (i) has the purpose or effect of creating an intimidating, hostile or offensive work environment, (ii) has the purpose or effect of unreasonably interfering with an individual's work performance, or (iii) otherwise adversely affects an individual's employment opportunities.
- **Retaliation:** A punitive or negative response to an individual's assertion of their right to be free from behavior that violates this Global Code of Conduct, or to participate in an investigation into such behavior.
- **Sexual Harassment:** Sexual harassment is one form of harassment, and a form of sexual violence. It includes unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when that conduct explicitly or implicitly affects an individual's employment, unreasonably interferes with an individual's work performance, or creates an intimidating, hostile, or offensive work environment. There are two primary types of sexual harassment:



- Quid pro quo harassment: in which submission to or rejection of unwelcome sexual conduct by an individual is used as the basis for employment decisions affecting that individual; and
- Hostile environment harassment: unwelcome sexual conduct that unreasonably interferes with an individual's job performance or creates an intimidating, hostile, or offensive working environment.
- **Abuse of Authority:** Abuse of authority entails the improper use of a position of influence, power, or authority by an individual against a colleague or group of colleagues.
- **Bullying:** Bullying is typically understood as repeated incidents or patterns of behavior that are intended to intimidate, offend, degrade, or humiliate a particular person or group of people. Bullying is an assertion of real or perceived power through aggression.

## Supporting Our Global Team

White Ribbon Alliance is committed to creating a diverse, inclusive, and respectful working environment and to cultivating a culture of mutual accountability and respect. We are committed to a culture where individuals feel safe to report concerns without fear of retaliation. We believe that every staff member has the right to be treated with dignity and respect, and never be exposed to victim blaming attitudes.

In our multicultural environment, we celebrate the diversity of our staff and recognize that there are cultural differences surrounding the understanding of workplace interactions. It is our hope that White Ribbon Alliance can foster an environment in which we presume positive intentions of each other first, and freely ask for clarification of meaning when something does not feel right. It is important to be sensitive to cultural misunderstandings and the differences of perspective that arise from differing backgrounds and communication styles. However, cultural differences are not an excuse for behavior that violates the minimum standards we have set for ourselves in this Global Code of Conduct, regardless of where we sit. "I was joking," or "I didn't mean it that way," are not defenses to allegations of offensive behavior. We must all exercise cross-cultural sensitivity. Conservative and context-specific professional decorum should be exercised at all times to prevent misunderstandings.

All employees who are engaged in the prevention and mitigation of behaviors prohibited by this Global Code of Conduct will pay close attention to the rights, needs, and wishes of the Target of those behaviors. While complaints made immediately after the incident are most effective, WRA encourages employees to report behavior that they believe to be in violation of this Global Code of Conduct at any time. Within three (3) business days of receiving a complaint, the Investigator will reach out to the Target to check on the Target's wellbeing, discuss any necessary accommodations, and offer supportive resources. The Investigator will ask the Target to describe their preferred outcome and discuss with the Target the need to investigate the allegations and what to expect throughout the process.

### [White Ribbon Alliance Employees \(Global\)](#)

Employees are encouraged to seek and understand the employment benefits available through their employer as these will vary according to each entity and country. Individuals employed by any organization under the White Ribbon Alliance may request reasonable interim accommodations of needs that arise while an investigation is underway. The following individuals are also designated as resources to provide support and counsel to cope with personal and professional affects at any stage of filing a complaint:



- Chief Executive Officer, Global Secretariat
- Director of Operations, Global Secretariat
- Chair, National Alliance Council

### Resources for Global Secretariat Employees

Employees of the Global Secretariat may request reasonable interim accommodations of needs that arise while an investigation is underway and seek support from your immediate supervisor. The following individuals are also designated as resources to provide support and counsel to cope with personal and professional effects at any stage of filing a complaint:

- Chief Executive Officer, Global Secretariat
- Director of Operations, Global Secretariat
- HR Business Partner, Nextep

### Confidentiality of Employee Information

White Ribbon Alliance will protect confidential information of employees to the maximum extent possible and will never tolerate use of confidential employee information to discriminate. Medical information may be disclosed with care in the limited circumstances when it is considered essential to protect health and life, or if we are legally required to do so. Some examples of this include:

- to safety and first-aid workers, if necessary, to provide medical treatment to the employee, or safely evacuate an employee;
- to the employee's supervisor, if the employee's disability requires restricted duties or reasonable accommodation;
- to government officials, if required by law; and
- to insurance companies that require a medical exam.

In addition, White Ribbon Alliance strives to maintain confidentiality with respect to all protected classes as outlined in this Code of Conduct, as well as salary, personal tax information, performance reviews, complaints or allegations made by or against an individual and investigations.

### **Obligation to Report**

When behavior occurs that violates the commitments and standards we have outlined in the Global Code of Conduct, White Ribbon Alliance is committed to ensuring the safety of the Target and making sure the behavior stops and does not reoccur. We cannot do that unless we know about the behavior. Therefore, all staff are strongly encouraged to report any behavior that they believe may violate the standards outlined here. Across White Ribbon Alliance certain individuals are required by their role to act with the Duty of Care, including members of any White Ribbon Alliance Board of Directors, or governing bodies, Executive Directors, National Coordinators and the Senior Management Team of the Global Secretariat. These individuals are required to report behavior that they reasonably suspect or believe to violate the Code of Conduct as outlined here.

Retaliation is absolutely not tolerated at White Ribbon Alliance. Acts of retaliation should be reported and



will be promptly investigated and addressed. Any staff member – no matter their seniority level – who retaliates against another for making a report, or participating in an investigation, will be subject to discipline up to and including termination.

## **Discrimination is Prohibited at White Ribbon Alliance**

Discrimination contradicts the very nature of the White Ribbon Alliance global movement and violates the principles we stand for. Discrimination of any kind is illegal, and it is prohibited at White Ribbon Alliance. Discrimination occurs when a person treats one individual differently than another because of that individual's membership in, or identification with, a protected category, or that of the individual's relatives, friends, or associates.

Protected categories include:

- Race, color, ethnic or national origin;
- Age;
- Religion or religious creed or belief;
- Sex, including pregnancy, childbirth, breastfeeding, reproductive health decisions, or related medical conditions;
- Sexual orientation;
- Gender, gender identity, gender expression, transgender status or sexual stereotypes including behavior, appearance, expression or behavior that may be different than what you were assigned at birth;
- Family responsibilities: supporting a person in a dependent relationship which includes, but is not limited to, children, grandchildren, parent.
- Nationality, immigration status, citizenship or ancestry;
- Marital status;
- Perceived or actual, past or present, physical, mental, learning or intellectual impairment that substantially limits one or more major life activities, genetic information or characteristics, and HIV/AIDS status;
- Political views or activity;
- Veteran status;
- Matriculation: being enrolled in college, university or some type of secondary school;
- Status as a survivor or family member of a survivor of domestic violence, a sexual offence or assault, or stalking; and
- Any other basis protected by applicable national or local laws. .

If you believe you have been the Target of discrimination, we strongly encourage you to report the incident using the procedures described below. White Ribbon Alliance will investigate each report promptly, thoroughly, and impartially. Any retaliation against a person who reports behavior they believe is discriminatory or participates in an investigation into that behavior is strictly prohibited.



## Harassment Is Prohibited at White Ribbon Alliance

Harassment is a form of discrimination. Harassment is unwelcome conduct directed toward a person because of that person's membership in, or affiliation with, a protected category or that of the individual's relatives, friends, or associates. Harassment is unlawful when:

- Enduring the offensive conduct becomes a condition of continued employment, or
- The conduct is severe or pervasive enough to create a work environment that a reasonable person would consider hostile, intimidating, or abusive.

White Ribbon Alliance is committed to stopping, preventing, and correcting this behavior before it becomes severe or pervasive. Therefore, offensive behavior may violate this Global Code of Conduct even if it does not meet the legal definition of harassment.

Harassment can range from extreme behaviors, including violence, threats, or physical touching, to less obvious acts like ridiculing, teasing, repeatedly bothering individuals, or offering opportunities to one individual but not another based on a protected characteristic. Examples of harassment include, but are not limited to:

- derogatory or insensitive jokes, pranks, or comments;
- slurs or epithets;
- derogatory statements not directed at the Target but that take place within their hearing;
- non-verbal behavior such as staring, leering, or gestures;
- ridiculing or demeaning comments;
- microaggressions;
- behavior perceived to be punitive in nature, such as ignoring;
- innuendos or veiled threats;
- derogatory, offensive, demeaning, or belittling comments about an individual or one or more people;
- teasing, mimicking, or repeatedly commenting on an individual's disability, accent, or other protected characteristic;
- displaying or sharing belittling or demeaning images, objects, or written materials;
- accessing offensive materials online during work time;
- accessing offensive materials online using White Ribbon Alliance equipment;
- unnecessary or unwanted physical contact;
- laughing at, ignoring, or otherwise retaliating against an employee who complains about harassing behavior.

These are only examples and is not an exhaustive list of behaviors that may be considered harassment at White Ribbon Alliance. Behaviors such as these violate our values whether they are spoken or written and whether they occur within the workplace or in any other work-related setting, such as during business trips, business meetings, organization-led social events, or on social media.

If you believe you have been the Target of harassment, we strongly encourage you to report the incident using the procedures described below. White Ribbon Alliance will investigate each report promptly, thoroughly, and impartially and take appropriate action. Any retaliation against a person who reports behavior they believe to be harassment, or participates in an investigation into that behavior, is strictly prohibited.



## **Sexual Harassment is Prohibited at White Ribbon Alliance**

Sexual harassment of any kind is never tolerated at White Ribbon Alliance, directly contradicts our mission and values and is illegal in most countries. As with other areas of this document, we consider sexual harassment to be unacceptable in any circumstances, including if it is not illegal, or does not meet the legal definition in the country that the behavior occurred. Like other forms of harassment, sexual harassment can be extremely harmful, both to the persons subjected to it and those who witness it, and to the achievement of White Ribbon Alliance's goals. We are committed to intervening as early as possible to stop, prevent, and correct this behavior.

Sexual harassment occurs when one person makes unwelcome sexual advances, requests for sexual favors, or other verbal or physical acts of a sexual nature to another if that conduct:

- explicitly or implicitly affects an individual's employment;
- unreasonably interferes with an individual's work performance; or
- creates an intimidating, hostile, or offensive work environment.

Sexual harassment can be physical, visual, verbal, or nonverbal in nature. It includes non-sexual behaviors such as statements that demonstrate harassment on the basis of a person's sex status, regardless whether any sexual innuendo is used. This type of harassment occurs, for example, if a person is harassed either for exhibiting what is perceived as stereotypical characteristics of their sex, or for failing to conform to stereotypical notions of masculinity, femininity, or other non-binary gender identity as determined by the individual only.

Sexual harassment can happen between persons of the same sex or gender, or persons of different sex or gender. Just like other forms of harassment, sexual harassment can occur through social media, the internet, and over phones and other devices. White Ribbon Alliance recognizes that sexual harassment is a manifestation of power relationships and often occurs within unequal relationships in the workplace, for example between manager or supervisor and employee. However, sexual harassment – just like other forms of harassment – can also occur between co-workers or between an employee and a nonemployee.

It is not possible to list all behaviors that may constitute sexual harassment. Whether or not a particular behavior constitutes sexual harassment will depend upon the particular circumstances. However, any of the following examples may constitute sexual harassment if the behavior is based on an individual's sex (including that person's gender, gender expression, gender identity, transgender status, etc.):

- unwelcome advances, flirtations, or propositions – whether they involve physical touching or not;
- direct or implied requests for favors in exchange for actual or promised job benefits such as favorable reviews, salary increases, promotions, increased benefits, or continued employment;
- making or threatening reprisals after a negative response to advances;
- unwelcome or suggestive comments, jokes, teasing, or gossip including, but not limited to, comments about an individual's appearance, sexual activities, experience, deficiencies, or prowess;
- displaying suggestive objects, pictures, photographs, or cartoons;
- unwelcome physical contact such as patting, grabbing, massaging, pinching, brushing against the body, impeding or blocking movement, or making gestures;
- language that is humiliating to an individual on the basis of their gender identity, expression;



- unwelcome leering or whistling;
- continuing prohibited behavior after a coworker has objected;
- using terms of endearment such as honey, babe, or stud when referring to co-workers;
- assault or coerced acts;
- conducting prohibited behaviors online, over text, on social media, and the like.

White Ribbon Alliance is committed to stopping this behavior before it becomes severe or pervasive and to creating a culture that is free of sexual harassment. We cannot do this unless we know about the behavior. Therefore, if you believe you have been the Target of sexual harassment, we strongly encourage you to make a report as soon as possible. White Ribbon Alliance will investigate each report promptly, thoroughly, and impartially and take appropriate action. Any retaliation against a person who reports behavior they believe to be sexual harassment, or participates in an investigation into that behavior, is strictly prohibited.

### **Abuse of Authority and Bullying are Prohibited at White Ribbon Alliance**

White Ribbon Alliance does not tolerate abuse of authority or bullying. Abuse of authority entails the improper use of a position of influence, power, or authority by an individual against a colleague or group of colleagues. Bullying is typically understood as repeated incidents or patterns of behavior that are intended to intimidate, offend, degrade, or humiliate a particular person or group of people. Bullying is an assertion of real or perceived power through aggression. Any person at any level of the organization may be a bully or the Target of bullying behavior.

The following examples may constitute abuse of authority or bullying if they are sufficiently serious or demonstrate a pattern of behavior:

- spreading malicious rumors, gossip, or innuendo;
- intentionally excluding someone from normal workplace conversations and making them feel unwelcome;
- physical abuse or threatening abuse;
- withholding necessary information or purposefully giving incorrect information;
- intruding on a person's privacy by pestering, spying, or stalking;
- asking a subordinate to cover up for unauthorized absences in exchange for promised or implied favors;
- yelling or use of profanity;
- criticizing a person persistently or constantly;
- belittling a person's opinions;
- unwarranted or undeserved monitoring and/or punishment;
- blocking applications for training, leave, or promotion without justification;
- tampering with a person's personal belongings or work equipment;
- using workplace resources to threaten, harm, intimidate, embarrass, or otherwise harm another person.



The following are examples of behaviors that do not constitute bullying:

- expressing differences of opinion
- offering constructive feedback, guidance, or advice about work-related behavior; or
- reasonable action taken by a supervisor relating to the management and direction of staff or the place of employment (e.g., managing performance, taking reasonable disciplinary actions, or assigning work).

If you believe you have been the Target of bullying or an abuse of authority, we strongly encourage you to report the behavior using the procedures described below. White Ribbon Alliance will investigate each report promptly, thoroughly, and impartially and take appropriate action. Any retaliation against a person who reports behavior they believe to be bullying or an abuse of authority, or participates in an investigation into that behavior, is strictly prohibited.

### **Retaliation is Prohibited at White Ribbon Alliance**

White Ribbon Alliance prohibits retaliation against any employee who participates in good faith in the processes outlined in our Global Code of Conduct. Retaliation occurs when a person is penalized for engaging in certain activities (“protected activities”) including, but not limited to:

- reporting behavior they believe to be a violation of our Global Code of Conduct, including communicating with a supervisor or manager about discrimination, harassment, abuse of authority, or bullying;
- filing or being a witness in a charge, complaint, investigation, or lawsuit relating to a violation of our Global Code of Conduct;
- expressing an intent to report what they believe to be a violation of this Global Code of Conduct;
- assisting another employee in an effort to report a potential violation of this Global Code of Conduct;
- answering questions during an investigation into an alleged violation of this Global Code of Conduct;
- refusing to follow orders that would result in discrimination, harassment, abuse of authority, or bullying;
- resisting sexual advances, or intervening to protect others;
- requesting accommodation because of a disability or for a religious practice;
- asking managers or co-workers about salary information to uncover potentially discriminatory wages.

Some behaviors that may be retaliatory, if they are conducted in response to the types of activities listed above, include but are not limited to:

- excluding the employee from decisions or activities;
- isolating the employee;
- negatively impacting the employee’s terms or conditions of employment (e.g., increased hours, less pay, demotion, reassignment, reduction in responsibilities);
- failing to award an employee a raise or bonus;
- blocking advancement or other employment opportunities;
- removing perks granted to other, similarly situated employees;
- poor evaluations; or



- disclosing information the employee otherwise keeps private, such as immigration status or sexual orientation.

Retaliation is absolutely prohibited at White Ribbon Alliance. If you make a report or participate in another protected activity and believe you are retaliated against as a result, we strongly encourage you to report the behavior using the procedures described below. Each report of retaliation will be investigated promptly, thoroughly, and impartially. Any person – no matter their level of seniority – who retaliates against another will be subject to discipline, up to and including termination.

### **Informal Responses to Offensive Behavior**

If you believe you have been the Target of conduct prohibited by this Global Code of Conduct, and you feel comfortable doing so, you may choose to communicate directly with the individual engaging in that conduct, informing them that their behavior is unacceptable to you and that you would like it to stop.

We recognize that it is not always easy to directly confront the Accused. If you choose to pursue this option, it is often helpful to plan what you want to say, how you want to say it, and where and when to have the conversation. Alternatively, you might choose to write a letter or email to the Accused, describing the behavior you find to be offensive and asking him or her to stop. Regardless of your location, White Ribbon Alliance has designated the following individuals to support you in making and executing your decision, as needed.

- Chief Executive Officer, Global Secretariat
- Director of Operations, Global Secretariat
- Chair, National Alliance Council

You are not required to engage directly with the Accused and, even if you choose to do so, you are still encouraged to report the behavior to White Ribbon Alliance using one of the procedures outlined here. Reporting the incident allows us to support you fully, ensure that the unwelcome behavior ceases, and prevent its future recurrence. Once informed, the organization can also make sure that you do not experience any retaliation – whether for making the report and participating in the investigation, or for responding directly to the wrongdoer.

### **Reporting a Concern**

Acknowledgement and adherence to our Global Code of Conduct will be upheld under the oversight of the National Alliance Council and may include employee disciplinary action; review, suspension or termination of affiliation status and/or eligibility for funding from the Global Secretariat for National Alliances; and/or termination of contract (for vendors). For us to do this effectively, we must rely on individuals to report instances where violations occur.



Anyone can report behavior they believe may violate the commitments and standards we have set for ourselves in this Global Code of Conduct, including behavior of employees and nonemployees anywhere in the world. We strongly encourage all staff members to do so.

Across White Ribbon Alliance certain individuals are required by their role to act with the Duty of Care, including members of any White Ribbon Alliance Board of Directors, or governing bodies, Executive Directors, National Coordinators and the Senior Management Team of the Global Secretariat. These individuals are required to report behavior that they reasonably suspect or believe to violate the Code of Conduct as outlined here.

White Ribbon Alliance absolutely prohibits retaliation against any person who, in good faith, makes a report or participates in an investigation. Any reported retaliation will be investigated and addressed promptly and thoroughly in accordance with the procedures detailed below.

It is important to us that employees have resources available to file a complaint in a manner that they are comfortable with. White Ribbon Alliance has designated individuals who are accountable for receiving complaints filed and ensuring prompt investigation and appropriate action. Employees are encouraged to file complaints of behavior believed to be in violation of our Global Code of Conduct directly with these individuals by phone, in writing or in person.

[Chief Executive Officer, Global Secretariat](#)  
[Director of Operations, Global Secretariat](#)  
[Chair, National Alliance Council](#)

An employee may prefer, or a situation may require, alternative methods of reporting. The following options are available. You may decide whether you wish to identify yourself as the complainant or not.

- **Discussion with supervisor.** Employees may be most comfortable discussing the behavior believed to be in violation of this Global Code of Conduct with their direct supervisor in advance of filing a complaint, or as a source of support for filing a complaint.
- **The Chairperson of any White Ribbon Alliance Board of Directors, National Alliance Executive Directors, National Coordinators, and members of the Global Secretariat Senior Management team.** You may file a complaint with any of the individuals listed above, who are required to report this information on your behalf, but not required to provide your name.
- **Chair of the Global Secretariat Board of Directors.** You may file a complaint with the [Chair of the Global Secretariat Board of Directors](#) who will take appropriate action to initiate an investigation.
- **Anonymous Reporting.** White Ribbon Alliance offers anonymous reporting through NAVEX EthicsPoint. This hotline service allows individuals to report behavior that they believe to violate this Global Code of Conduct by phone in their preferred language. International phone numbers may be found on the internet site, listed below. We offer reporting sites that are accessible by mobile phone or computer for submission of complaints.

Internet Site                    <http://whiteribbonalliance.ethicspoint.com/>  
Mobile Phone Site            <https://whiteribbon.navexone.com/>



If you have experienced conduct you believe is contrary to this Global Code of Conduct, or have witnessed that conduct, we strongly encourage you to report the incident promptly. Prompt reporting allows the us to provide active support to you and respond and address the behavior before it becomes severe or pervasive. Please report your concerns as soon as possible.

It is important that complaints filed include specific, actionable information that can be used during the course of the investigation. We ask that you make your best effort to include key details to support an effective investigation to the extent that you are comfortable:

- Date of Report
- Your Name (if you choose to provide it)
- Name of Target
- Name of Accused
- Date(s) of Incident
- Specific Location of Incident
- Witnesses and Potential Witnesses
- Description of the incident(s) that you believe to be in violation of this Global Code of Conduct. Descriptions should be fact based and include as many relevant details as possible.
- If you are a witness, please try to make your report from your own perspective and not presume the experience of others.

You can use one of the reporting avenues above whether the conduct you experienced occurred in the US or internationally. You are encouraged to make a report even if the behavior involves individuals from other White Ribbon Alliance entities, or individuals who are not employed by White Ribbon Alliance.

## **Investigations – What to Expect**

White Ribbon Alliance will investigate all reports whether the complaint conforms to a particular format or is made verbally or in writing. Every report of discrimination, harassment, retaliation, abuse of authority, and bullying will be investigated promptly, thoroughly, and impartially by a qualified Investigator. In most instances, the Chair of the National Alliance Council, Global Secretariat Chief Executive Officer or Director of Operations will serve in the role of Investigator, however, this determination will be made on a case by case basis to ensure an appropriate person is appointed to objectively assess each situation and make recommendations to the Review Panel.

All White Ribbon Alliance staff, affiliates and partners are required to cooperate and provide truthful information in an investigation. All individuals involved in the investigation – including the Target, the Accused, and any witnesses or interviewees – will be treated with respect and dignity. When participating in an investigation, there are several things you can expect:

### Beginning of the Investigation

If you choose to provide your name, the Investigator will reach out to you within three (3) business days from receiving your complaint report. In that initial contact, the Investigator's primary goal is to ensure your wellbeing. The Investigator will provide information regarding staff support resources and discuss with you any accommodations necessary to ensure your safety and wellbeing. During this initial contact,



the Investigator will also discuss with you the investigation process and confirm relevant details as outlined by you.

For complaints involving allegations against Global Secretariat staff, the Nextep HR Business Partner will be notified and may participate in developing the investigation plan. If your complaint is against a member of the Senior Management Team, the Chair of the Global Secretariat Board of Directors will also be notified. If the complaint is against an employee or representative of a National Alliance, the Chair of the National Alliance Council will be notified.

### During the Investigation

Throughout the investigation, the Investigator will conduct individual interviews with the parties involved and, where necessary, with individuals who may have observed the alleged conduct or have other relevant knowledge. Prior to a meeting, the Investigator will contact you by email to coordinate schedules. As outlined, every effort will be made to ensure confidentiality of investigations. You do not need to prepare for the meeting unless you are specifically requested to do so. In support of our mutual commitment to a respectful and inclusive workplace, White Ribbon Alliance staff are required to participate in the investigative process if asked.

There will likely be two Investigators in the meeting with you. One will be there to take notes. You will be asked a variety of questions about a particular topic. It is important that you be open and honest and provide as much detail as possible in your responses. If there are particular individuals you believe the Investigator should speak with, you may identify them. You may also recommend particular questions to be asked of those individuals. However, the final decision of who to interview and what questions to ask is in the discretion of the Investigator(s). If allegations have been made against you, you will be advised of them during the meeting and given an opportunity to respond.

### Following the Investigation

Once the investigation is completed, the Investigator will draft a confidential report summarizing the investigation's findings. The Review Panel will be comprised of the Chief Executive Officer, Director of Operations, Chair of the National Alliance Council and one additional NAC member selected by the Chair, will review the investigation report and determine whether a violation of Global Code of Conduct has occurred. The Review Panel will make an appropriate determination as to the sharing of this information based on essential business need for the information.

In making its determination, the Review Panel will analyze, among other things, whether a reasonable person would find the environment or behavior hostile, abusive, or unacceptable, as well as whether the Target viewed it as such. This determination will be based on both subjective and objective factors, considering the totality of the circumstances surrounding the alleged incident, including, without limitation, the frequency, duration and severity of that conduct.

The Review Panel will determine the appropriate responsive action based on all facts and circumstances uncovered during the investigation. While the criteria used to determine responsive action will vary for each unique set of circumstances, in all cases responsive action will be designed to meet three (3) criteria.



1. The severity of the responsive action is appropriate to the severity of the behavior the employee is found to have conducted.
2. The responsive action is sufficient to end the behavior that is in violation of this Global Code of Conduct.
3. The responsive action is consistent with previously imposed action(s) for similar conduct by other employees.

Based on the results of the investigation, responsive actions may include, but are not limited to, mediation between the parties if it is considered an appropriate path to resolving the issue and can be done in a manner that feels safe for all involved, training, required coaching, verbal and written warnings, withholding of a promotion or pay increase or bonus, reassignment, temporary suspension without pay, and/or dismissal. Other responsive actions may be implemented as appropriate, depending on particular circumstances.

White Ribbon Alliance will follow guidance for responsive action as outlined in this Global Code of Conduct, applicable Employment Manuals and/or in accordance with labor laws in each country, but some common factors considered in making this determination include:

- The immediate physical and emotional safety of White Ribbon Alliance employees;
- Whether the individual is a present or potential risk to the organization;
- The seriousness of the actions that the Accused is found to have committed;
- Facts and circumstances, derived from the investigative process, including preceding events, complete context and evidence provided;
- Accused employee's response, including comprehension of the allegations and or Global Code of Conduct violation, demonstrated commitment to correct the behavior, complete responsive action requirements (mediation, training, required coaching, etc.) and evidence provided during the investigative process; and
- Employee history of behavior, including patterns of conduct, disciplinary action and/or complaints.

Following the Review Panel's determination, the Review Panel will provide a written copy of the disciplinary decision to the Accused, and when possible, review this information verbally with the individual. The Review Panel is responsible for implementing the disciplinary actions chosen in a timely manner. The Investigator will also reach out to the Target to inform them that the matter has been investigated, addressed and concluded. To protect confidentiality and ensure fairness to everyone involved, we may not be able to provide specific details about an investigation or its outcome.

As a general rule, White Ribbon Alliance will endeavor to complete its investigation within sixty (60) days of receiving a complaint. If an investigation takes longer than thirty (30) days, the Investigator will inform the Review Panel and the Target. If you are in need of support at any point prior to, during, or after an investigation, you may contact any of the individuals designated as resources throughout this document.

The National Alliance Council will monitor to ensure corrective action has been implemented in a manner that is consistent and appropriate to the results of the investigation and spirit and content of the Global Code of Conduct. If the NAC feels that such action was not taken, or in instances where behavior is



pervasive, the Chair may review, suspend or terminate affiliation status, or eligibility to receive funding from the Global Secretariat.

### Appeal of the Decision

If the Accused is dissatisfied with the decision of the Review Panel, they may appeal the decision.

- Appeals from Global Secretariat staff will be directed to the Chief Executive Officer, must be done in writing and within five (5) business days.
- Appeals from National Alliance staff will be directed to the Chair of the National Alliance Council, must be done in writing and within five (5) business days.
- Appeals by members of the Senior Management Team will be directed to the Chair of the Global Secretariat Board of Directors, must be done in writing and within five (5) business days.
- Partners as defined in this document have no right to appeal. Determinations of the Review Panel are final.

All complaints and appeals will be taken seriously. The appeal document will be considered carefully and in relation to the evidence and information obtained during the investigation. It may be required for additional interviews to take place, with the Accused and others, before a final determination is made. If an employee fails to appeal within the time limits set forth above, the problem should be considered settled on the basis of the last decision, and the problem should not be subject to further consideration. Exceptions to the timeline will be extended for individuals who are traveling.

### Intent

In order for White Ribbon Alliance to take actions necessary to cultivate a workplace culture that is respectful, safe and inclusive it is critical for us to be informed of behavior that is in violation of this Global Code of Conduct. We ask all staff who, in good faith, believe they have witnessed or experienced behavior in violation of this Global Code of Conduct to come forward even if you are unsure if something meets the criteria. No employee will ever be penalized for filing a complaint that is not found to have merit as long as the complaint was filed with honest intention.

Under no circumstances will White Ribbon Alliance tolerate filing of complaints with malicious intent – complaints known to be false, filed to discredit or otherwise harm another individual. All complaints will be presumed to be in good faith until and unless contradictory information becomes available.

## **Transparency and Confidentiality**

### Transparency and Confidentiality of Complaints and Investigations

We understand that every staff member – including those who report behavior they believe violates this Global Code of Conduct, those who are accused of such behavior, and those who witness the behavior – has a need for confidentiality and autonomy. White Ribbon Alliance cannot guarantee absolute confidentiality. However, disclosure of information will be made on a strict need-to-know basis based on our obligations, legally and to our employees, to investigate and take prompt responsive action. For example, to fully investigate and respond to a complaint, disclosures may have to be made to particular individuals including, but not limited to, the Review Panel, the Accused, and individuals interviewed as part of the investigation.



At the close of an investigation, the Investigator will reach out to the individuals involved to inform them that the matter has been addressed and closed. However, to protect confidentiality, the Investigator may not be able to provide details, such as particular discipline implemented, or responsive actions taken.

All persons involved in an investigation are asked to do everything reasonably possible to keep the investigation confidential. Confidentiality allows us to preserve the integrity of the investigation, to ensure fairness to all involved, and to protect the privacy of employees who have brought complaints or who are accused of wrongdoing. This request for confidentiality is not meant or intended to curtail employees' rights under the law to discuss work related matters but rather to protect all employees involved, including active prevention against retaliation.

All records collected or created during the investigation will be housed in White Ribbon Alliance's confidential files. Access to these files will be limited strictly to the Investigator, Chair of the National Alliance Council and Director of Operations and Chief Executive Officer of the Global Secretariat.

### **Holding Ourselves Accountable**

Investigators required to report all claims, allegations and complaints received, to the Chief Executive Officer of the Global Secretariat (US) or Chair of the National Alliance Council (International) within twenty-four (24) hours of receipt. Investigations, outcomes and follow up actions will also be shared with these persons based on location of the reported incident and Accused.

White Ribbon Alliance will report all claims, allegations and complaints received, investigations conducted and their outcomes, by type annually to White Ribbon Alliance staff, the Global Secretariat Board of Directors and the National Alliance Council. Specific information on each instance, as well as Individual identities, will not be revealed as part of these reports.

White Ribbon Alliance will commission a review of investigations procedures every three years.



**Acknowledgement and Commitment**

It is required for all White Ribbon Alliance employees, as well as members of Global and National Secretariat Board of Directors and National Alliance Council to acknowledge receipt of the Global Code of Conduct and pledge their commitment to uphold these standards. For the purposes of this Global Code of Conduct, we define employees as any Individual(s) employed by White Ribbon Alliance in any location, and individuals who are employed by WRA National Secretariat host organization and/or national affiliates whose work is in support of WRA, including permanent, temporary, full- and part-time positions, and interns.

**Name:** \_\_\_\_\_

**Position:** \_\_\_\_\_

**Relationship to White Ribbon Alliance:**

- Board of Directors or Governing Body member (of Global Secretariat or National Alliance)**
- National Alliance Council**
- White Ribbon Alliance Employees (Global Secretariat and National Alliances)**
- Employee of National Secretariat Host Organization, or National Affiliate**

**Organization Name:** \_\_\_\_\_

With my signature, I acknowledge that I have read the White Ribbon Alliance Global Code of Conduct and commit to upholding the standards as outlined. I understand the processes outlined to report behavior that violates the standards we have set for ourselves, and my shared responsibility to create a safe, respectful and inclusive culture for White Ribbon Alliance.

**Signature**  
**Name**  
**Date**