



How to Report Business Conduct Concerns

Chemonics policy does not allow retaliation in any form for honest reporting of suspected misconduct.

▶ Rights and Responsibilities

Chemonics' standards of business conduct, **Living Our Values**, apply to all employees around the world, to consultants, and to all others acting on Chemonics' behalf. Download a copy of **Living Our Values** from www.chemonics.com/OurStory/OurMissionAndValues/Standards-of-Business-Conduct.

Everyone who represents company interests must strictly observe U.S. laws and regulations and the laws of countries in which Chemonics works. All Chemonics' employees have a responsibility to report suspected misconduct.

Chemonics policy strictly prohibits retaliation in any form for honest and appropriate reporting of suspected misconduct. In addition, the United States Pilot Program for Enhancement of Employee Whistleblower Protection (41 U.S.C. 4712) protects employees who report concerns involving fraud, waste, abuse, or other violations of laws or regulations that they reasonably believe have occurred. If you feel you have been retaliated against for reporting a potential violation, please contact BusinessConduct@chemonics.com.

Chemonics does not tolerate rude, offensive, graphic, or threatening communications of any kind, whether made anonymously or directly. Intentionally dishonest or abusive reporting will be investigated and may result in disciplinary action, including termination.

▶ Information Needed

To help us evaluate your concern, please collect and provide all relevant facts by answering these questions:

1. What is the **person's name and position**?
2. What is the **project name**?
3. **When and where** did the alleged violation take place?
4. What problem do you want to report? **Describe the issue** as specifically as possible.



Bad Example:

"John Smith is committing procurement fraud."



Good Example:

"John Smith, lead engineer on **Project X** in [City, Country] requested \$500 from **Vendor ABC** on **Date** to influence the award of **Procurement XYZ001** for computer equipment."

5. **When and how did you become aware** of the problem?
6. **What documents, people, or activities** can we use to verify the problem?

▶ Whom to Contact

Discuss your concern and the facts you gathered with your supervisor, the chief of party, or another senior person in the project office. If you don't feel comfortable reporting the concern to someone on your project, contact Chemonics' confidential HelpLine in one of the following ways:



Online:

www.chemonics.com/reporting



E-mail:

BusinessConduct@chemonics.com



Call:

Chemonics HelpLine at 202.955.6881



Skype:

888.955.6881

When conducting inquiries into or reviews of issues, Chemonics makes every effort to maintain confidentiality.

▶ What to Report

We encourage you to report suspected violations of the following principles and legal requirements:

Treat others with respect, including maintaining an open and positive workplace, free of harassment, discrimination, exploitation, abuse, or trafficking in persons.

Be a good business partner, including dealing honestly and transparently with clients, beneficiaries, subcontractors, consultants, suppliers, and staff.

Keep complete and truthful records, including recording transactions correctly and accurately, making or approving payments only for authorized purposes, and recording work time and expenses accurately.

Protect Chemonics and project assets, including using project equipment properly and responsibly, and only for project business.

Maintain objectivity in decision-making, including disclosing to your supervisor or chief of party all business interests, family relationships, or obligations you have with people or companies that may provide goods or services to the project.

Think carefully before giving or accepting business favors, including not accepting or offering gifts, services, entertainment, or other items if they could be perceived as influencing business decisions.

Promote fair competition, including never requesting or accepting a bid from a company that does not exist or from a vendor that is known to have colluded with another vendor on pricing.

Uphold procurement integrity, including keeping supplier pricing confidential and not providing special treatment to particular suppliers.

Exercise integrity in hiring, including never asking anyone for money in exchange for a job.

Follow U.S. law and international agreements on corruption, including never offering anything of value to a government official and never asking for or accepting anything of value from a subcontractor, grantee, or supplier in exchange for favorable treatment.

▶ How We Respond

Chemonics' Office of Business Conduct will promptly review your report and decide upon the appropriate next steps, which may include:



1. Conducting an internal review to gather more facts about the issue.



2. If enough evidence exists to support the allegation, notifying appropriate U.S. agencies, taking timely corrective actions, and reviewing/reinforcing existing procedures. Separately, allegations of fraud or other criminal activity may also be directly reported to USAID's Office of Inspector General by emailing ig.hotline@usaid.gov or by phone at 1-800-230-6539.



3. If deemed appropriate and necessary, communicating the findings of the internal review to the individual who reported the concern, and any other relevant parties within the company.