

## 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](#) 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 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 Officer, or General Counsel.
- **Anyone** may contact PATH's compliance hotline to report concerns. The hotline is maintained by an independent, third-party provider and allows anyone to report allegations. To report concerns worldwide, go to the

reporting website found at <https://path.ethicspoint.com>. Individuals based in the United States 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.

## 2020 Report

In 2020, PATH investigated 72 allegations, the majority of which pertained to the following policies, procedures, and practices: conflict of interest; dating in the workplace; fraud, corruption, and dishonesty; harassment and retaliation; recruitment and hiring practices; workplace bullying; and wrongful termination.

Of the 72 allegations investigated, the findings confirmed 15 violations of policy:

- 2 conflict of interest.
- 1 dating in the workplace.
- 3 fraud, corruption, and dishonesty..
- 2 harassment and retaliation.
- 4 recruitment and hiring practices.
- 3 workplace bullying.

In response to these findings, PATH took several corrective actions, including terminating the employment of four staff. In addition to these dismissals, 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 2020, PATH critically reviewed and improved our allegation management process, including introducing

a dedicated investigator role and risk and compliance specialist role, as well as a point person for protection against sexual exploitation and abuse, to support this ongoing work. We also reviewed and revised key policies governing conduct and instituted additional training for staff and managers on the policies and procedures that collectively represent PATH's Code of Ethics.

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 our mission of advancing health equity.



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.

[path.org](http://path.org)

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