THE GLOBAL FUND

Code of Conduct

For Global Fund Employees

Amended as of July 2025



TABLE OF CONTENTS

Introduction **3**
Our Values 3
How to Navigate This Code 3
Know Our Code **4**
Purpose 4
Leaders and Managers: Additional Responsibilities 5
Making Good Decisions 5
Raising Concerns and Reporting Suspected Misconduct **6**
What to Expect 7
Protection From Retaliation 7
Foster Respect **8**
We Respect Ourselves and Others 9
We Embrace Diversity and Treat Everyone Fairly 10
We Keep Ourselves and Others Safe 10
Embody Our Duty of Care **11**
We Protect and Promote Human Rights and Gender Equality 12
We Protect against Sexual Exploitation, Abuse and Harassment 13
We Protect the Safety and Well-Being of Children 14
Model Integrity and Accountability **15**
We Avoid Conflicts of Interest 16
We Conduct Our Work Honestly and with Integrity 17
We Act with Integrity When Offered or Offering Gifts and Entertainment 18
We Act with Impartiality and Independence 18
Cultivate Trust and Transparency **19**
We Are Good Stewards of the Funds Entrusted to Us 20
We Protect Our Assets and Information 20
We Safeguard Confidential Information and Respect Privacy 21
We Are Responsible When Communicating 22

Cover photo: Sipiwe Zulu collects water with her cousin near their home in South Africa, where there is no running water. Life hasn't been easy for Sipiwe, but with her grandmother's care and support from the "Keeping the Girls in School" program, run by MIET Africa and supported by the Global Fund, she is continuing her education.
The Global Fund/Karin Schermbrucker

INTRODUCTION

The Global Fund is a worldwide partnership to defeat HIV, tuberculosis (TB) and malaria.

We raise and invest money to fight deadly infectious diseases and challenge the injustice that fuels them. We strengthen health systems and pandemic preparedness. We unite world leaders, communities, civil society, health workers and the private sector to find the most impactful solutions and take them to scale worldwide.

By working together with civil society, governments, private sector partners, philanthropists, technical partners and communities affected by these diseases, we can save lives and dramatically change the course of HIV, TB and malaria.

Our vision is a world free of the burden of AIDS, TB and malaria with better, equitable health care for all.

Our Values

The Global Fund's culture is anchored in our values, guiding our work. These values drive us toward our mission and enable us to maximize the impact for those who benefit from our work. Every person working for the Global Fund must endeavor to embody, model and promote our values in everything we do.

Integrity
Be truthful, consistent, impartial, fair and transparent in what we say and do.

Respect
Treat everyone, including ourselves, with empathy, courtesy, dignity and an open mind.

Duty of Care
Operate in the best interests of the Global Fund and be good stewards of our resources.

Accountability
Be responsible for our activities and decisions, always focused on defeating HIV, TB and malaria and the advancement of health for all.

Passion
Channel our energy and commitment towards serving others while caring for our and others' well-being.

Collaboration
Work together and communicate in ways that foster cooperation.

Innovation
Innovate, learn, embrace change, take measured risks and encourage ambitious goals.

Effectiveness
Focus on meaningful, sustainable outcomes through efficient processes and continuous improvement.

How to Navigate This Code

To help you navigate this Code, you'll find links at the top of each page to move quickly between sections. You will also find a link that directs you to information on how to raise concerns and ask questions, and what to expect when you make a report or participate in an investigation.

At the end of each section of the Code, you'll find a highlighted area with links to the following:

Policies & Procedures — **Policies & Procedures** will take you to a relevant Global Fund policy, rule or procedure.

Unlocking Resources — **Unlocking Resources** will take you to helpful guidance documents and additional information on the relevant topic.

Note: These resources are available only to those individuals with a Global Fund email address.

KNOW OUR CODE

IN THIS SECTION

Purpose
Leaders and Managers
Making Good Decisions

Purpose

The Code of Conduct for Global Fund Employees (the Code) connects the organization's vision and values to Global Fund employees' daily work by setting ethical standards and behavioral expectations. In this Code, "we," "us" and "you" refers to individual(s) working for the Global Fund under employee contracts and seconded staff, staff on loan, consultants and interns, regardless of their contractual arrangements.

Some roles may be subject to additional standards due to their role. These additional standards will be outlined in writing and provided to individuals in the relevant roles.

Every individual working for the Global Fund contributes to our culture, which accelerates the achievement of our mission. By upholding this Code, we foster a positive, productive and motivating work environment for all of us. While Global Fund employees' private lives are their own, there can be situations where an individual's behavior may negatively reflect on the Global Fund. Therefore, we expect all individuals to conduct themselves in a way that does not compromise the Global Fund's image and interests — even in activities outside the workplace or unrelated to official duties.

The standards of conduct and ethical behavior in this Code may be further defined by Global Fund policies, rules and procedures, including our Employee Handbook, all of which govern the actions and responsibilities of the Global Fund and its employees.

Each of us is responsible for understanding, upholding and complying with this Code as well as all Global Fund policies, rules and procedures. Failure to comply may result in administrative and disciplinary measures up to and including summary dismissal (for employees) or other measures as specified in relevant rules and contractual arrangements.

We Demonstrate Knowledge of Our Code by:

- Being knowledgeable about this Code and relevant policies, rules and procedures.
- Exercising sound judgment guided by our values and acting honestly and ethically in every situation.
- Working diligently to achieve our mission and demonstrate personal accountability to work as productively as possible.
- Seeking guidance when uncertain and fostering a workplace where everyone feels safe raising questions or concerns.
- Supporting those who raise concerns or seek assistance through our internal justice mechanisms and refraining from any form of retaliation.

We Are Required to:

- Uphold and comply with this Code as well as all Global Fund policies, rules and procedures at the office, when traveling or working outside Global Fund offices and in other settings while discharging our duties and representing the Global Fund.
- Work and behave in all professional settings in line with our values by respecting our coworkers, partners, communities and the people we serve.
- Provide truthful, accurate, complete and timely information in all duties, especially those relevant to decision-making.
- Participate fully and truthfully in investigations, providing complete and accurate information.

Leaders and Managers: Additional Responsibilities

While every individual is expected to put our Global Fund values into action, those in leadership or managerial positions set an ethical tone for the organization through their actions.

Leaders and Managers Set an Ethical Tone by:

- Promoting the well-being of all of us and creating a psychologically safe environment.
- Communicating fairly and respectfully about employment decisions, including staffing, performance, recognition and contracts.
- Nurturing a supportive and enabling work environment that allows for individual accountability and ownership.
- Leveraging our multinational workforce and considering diverse points of view when making decisions.
- Being approachable and actively listening, promptly addressing individual concerns with empathy and understanding and seeking guidance from the Human Resources Department or the Ethics Office when needed.

Setting an Ethical Tone Requires Leaders and Managers to:

- Model ethical behavior and lead by example.
- Promote ethical conduct and compliance with this Code, policies, rules and procedures.
- Assist in holding individuals accountable when their behavior violates this Code, policies, rules and procedures.
- Protect individuals from retaliation for raising good faith reports of potential misconduct or inappropriate behavior or participating in an investigation.

Making Good Decisions

This Code does not cover every ethical situation you may encounter. You are expected to use good judgment and common sense to comply with the terms, the intent and the spirit of this Code. When in doubt, ask yourself:

- Does this reflect our organizational values?
- Would my conduct be perceived as appropriate, particularly in the context of my work and our mission?
- Is this consistent with our Code, policies, rules and procedures?
- Are these actions in the best interest of the Global Fund, not just a particular individual or group?
- Would I be comfortable if my actions were made public?

If you can answer "**yes**" to all these questions, moving forward is probably safe. However, if you answer "**no**" or "**I am not sure**" to any of them, stop and reconsider your next steps. When in doubt, seek guidance from your manager, the Human Resources Department or the Ethics Office.

RAISING CONCERNS AND REPORTING SUSPECTED MISCONDUCT

All individuals are responsible for raising concerns when something does not feel right, and we all have a duty to report suspected or known misconduct.

Passion for our mission drives us to uphold high ethical standards. When you raise concerns, ask questions or report misconduct, you help the Global Fund address issues early and effectively, allowing us to work together to improve the situation. Speaking up also supports a culture of continuous improvement, where innovation thrives in overcoming challenges.

When handling workplace concerns, conflicts or disputes, we encourage individuals to attempt to address them directly with their colleague(s) if they feel comfortable doing so. If you do not feel comfortable or are unable to resolve the concern, conflict or dispute, or the situation involves suspected or known misconduct, there are several ways to get help, some of which allow for anonymous submission. Choose the option you feel most comfortable with for the type of concern, question or report you have:

- Your manager or supervisor
- Your HR Business Partner
- Any member of HR Employee Relations
- Ethics Office — globalfundethics@theglobalfund.org
- Office of the Inspector General (OIG) — hotline@theglobalfund.org or www.ispeakoutnow.org

You can also contact these resources to support you in raising concerns, asking questions or reporting misconduct:

- Ombuds — ombud@theglobalfund.org
- Staff Counsellor — staffcounsellor@theglobalfund.org
- Staff Council — staffcouncil@theglobalfund.org
- The Global Fund takes all reports of suspected or known misconduct seriously.

Misconduct is a breach of any Global Fund policy (including but not limited to the Code of Conduct, Ethics and Integrity Framework, Human Resources Policy Framework and Employee Handbook), or the terms of an employee's contract. Actions that may cause or have the potential to cause harm to individuals or negatively affect the interests of the Global Fund may also amount to misconduct.

All of us are expected to raise concerns and make reports in good faith — meaning you genuinely believe the information you share to be true and accurate even if you are mistaken. Knowingly reporting false information is a violation of this Code. Individuals who knowingly report false information may face administrative, disciplinary or other measures, as appropriate, up to and including summary dismissal.

IN THIS SECTION

What to Expect

Protection From Retaliation

What to Expect

When you in good faith, raise concerns or seek assistance through our internal justice mechanisms:

- **You will be treated fairly:** The Global Fund prohibits retaliation against anyone in these situations.
- **The Global Fund will take action:** Your report will be reviewed, and guidance will be provided for resolution. If an investigation is needed, it will be conducted fairly and objectively in accordance with our procedures.
- **Your cooperation will be critical:** We may need your help to resolve workplace conflicts and disputes or investigate allegations of misconduct. We ask for your patience, thoughtfulness and honesty throughout the process. The subject of an investigation is entitled to a presumption of innocence.
- **You will be treated with respect:** We value all good faith reports because they help us improve. The Global Fund requires everyone involved in addressing reports of misconduct or participating in investigations to maintain confidentiality. You will receive an acknowledgment of your concern or report — and we will update you in accordance with our procedures.

Protection From Retaliation

We are committed to providing a work environment that promotes open communication about ethics and integrity — one in which everyone feels safe to communicate openly, without fear of retaliation.

Retaliation for good faith reporting of concerns or potential misconduct, or participating in an investigation or internal justice mechanism may come in many different forms. It can be overt, such as verbal harassment, intimidation, or unwarranted changes to job duties, denials of promotions or low performance ratings. Retaliation can also be subtle, such as not inviting someone to a meeting or outing, speaking poorly about a person to others, providing fewer opportunities for personal development or underutilizing a person.

Individuals who engage in retaliatory actions against others in these situations will face administrative, disciplinary or other measures, as appropriate, up to and including summary dismissal.

Click the links for more information. Some are for internal use only and may require special access.

Unlocking Resources | Policies & Procedures

FOSTER RESPECT

We are dedicated to creating an environment where everyone can express themselves without fear of harassment or intimidation. Upholding professionalism and respect in work and work-related social settings is essential for building trust and sustaining effective, collaborative and innovative teams.

IN THIS SECTION

We Respect Ourselves and Others
We Embrace Diversity and Treat Everyone Fairly
We Keep Ourselves and Others Safe

Ly Rithy at her home in Phnom Penh, Cambodia. For over 20 years, she has been supporting female sex workers with HIV prevention, testing, and care. Now 55, Rithy continues her work five days a week – distributing condoms, offering rapid tests and helping women access the treatment they need.
The Global Fund/Maika Elan/VII



We Respect Ourselves and Others

We Contribute to a Healthier World When ...

We maintain an environment where everyone is treated with dignity and respect. We encourage our colleagues to express themselves freely and seek feedback or help without fear of harassment or intimidation. Harassment and other forms of misconduct have no place in our work — whether it comes from or is directed at a coworker, manager or third party. Harassment includes behavior that threatens, demeans, humiliates, intimidates or coerces someone. It can be sexual or non-sexual. Common examples of harassment include:

Verbal Actions
Verbal actions such as threats, demeaning or derogatory comments, shouting, negative stereotyping and offensive jokes.

Inappropriate Imagery
Distributing, displaying, sharing or posting degrading or unfavorable visual messages, pictures, posters, photographs, cartoons, drawings, written material and blogs, including those of a sexual nature.

Abuse of Power or Position
Someone in a position of power, authority or influence using their position or title to take advantage of, marginalize or disrespect others.

Nonverbal Actions
Nonverbal actions include gestures that ridicule, insult, demean or demonstrate hostility toward an individual or a group. Nonverbal actions may also include deliberately ignoring an individual by repeatedly not responding to messages.

Unwelcome Advances
Unwelcome touching, sexual advances, obscene gestures, requests for sex acts or other sexual conduct where submission is a condition of or used as the basis for employment decisions, such as hiring, career advancement or performance evaluations.

Microaggressions
Verbal, behavioral and other indignities that communicate hostile, derogatory or negative comments based on an individual's role or inherent characteristics, such as race, ethnicity, language, sexual orientation, gender identity, religion, age or disability.

We Foster Respect by:

- Promoting a collaborative environment by acknowledging the contributions and ideas of others.
- Focusing on facts and shared goals, expressing your opinions respectfully and actively listening to others to better understand their viewpoints — rather than simply responding.
- Thinking about how your words and actions can be perceived and avoiding language that could be considered offensive or demeaning.
- Embracing mistakes as opportunities for learning and growth, receiving and providing constructive feedback openly and being willing to adapt your behaviors accordingly.



Students at Sikhulile Primary and Secondary School in South Africa take part in the "Keeping the Girls in School" program, discussing topics like HIV prevention and unplanned pregnancy. The program is run by MIET Africa and supported by the Global Fund.
The Global Fund/Karin Schermbrucker

Fostering Respect Requires Us to:

- Treat everyone around you, including colleagues, partners and service providers, with respect and dignity.
- Never insult, bully or harass others and never engage in any unwanted physical contact or sexual advances.
- Recognize and take actions to address unprofessional, harassing, discriminatory or disrespectful behavior.

Click the links for more information. Some are for internal use only and may require special access. Unlocking Resources | Policies & Procedures

We Embrace Diversity and Treat Everyone Fairly

We Contribute to a Healthier World When ...

We value and celebrate all types of diversity at our organization. We are committed to creating a working environment based on trust, mutual respect, dignity and equal opportunity. By doing so, we build, retain and advance a diverse workforce and proactively foster a work environment that provides individuals with different backgrounds the opportunity to contribute and develop.

We Foster Respect by:

- Treating everyone fairly, regardless of background, culture and inherent characteristics.
- Seeking to understand and build empathy for individuals with different lived experiences, backgrounds, perspectives and cultural influences, and embracing a diversity of viewpoints within our multinational organization.
- Avoiding actions or statements that may exclude or divide people because of their differing inherent characteristics.
- Fostering a respectful working culture that sets standards for respect across the group and leaves room for everyone to contribute and have an impact.
- Learning to identify and challenge unconscious biases within ourselves and others related to stereotypes about the diverse backgrounds, skills and cultures of others.

Fostering Respect Requires Us to:

- Make employment and other decisions based on an individual's skills, experiences and credentials without bias.
- Never discriminate by making employment or other decisions based on an individual's race, color, gender, sex, nationality, ethnic origin, age, religion or similar belief, language, political or other opinion or affiliation, sexual orientation, gender identity, family or civil status, disability or health status.

Click the links for more information. Some are for internal use only and may require special access. Unlocking Resources | Policies & Procedures

We Keep Ourselves and Others Safe

We Contribute to a Healthier World When ...

We provide a safe work environment and promote the emotional, psychological and physical health and well-being of all of us. We are committed to creating a space where everyone can feel comfortable sharing their ideas and opinions and making mistakes without fear of ridicule or retribution.

We are committed to maintaining a workplace free from violence, discrimination and threats. This type of behavior is never acceptable, even as a joke. Additionally, we keep our workplace free from drugs and excessive alcohol consumption, understanding that they can impair job performance and create safety risks.

We Foster Respect by:

- Protecting yourself and others in all work activities.
- Looking out for one another and collaborating to foster a safe and respectful workplace.
- Promoting psychological safety and well-being in the office and when traveling or working outside our offices.
- Providing clear, objective and consistent feedback to individuals, actively managing workloads and addressing burnout and barriers to improved psychological safety and well-being.

Fostering Respect Requires Us to:

- Adhere to all safety rules relevant to your role.
- Follow our health, safety and security policies and guidelines, including when traveling or working outside our offices.
- Obtain required medical and security clearances.

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EMBODY OUR DUTY OF CARE

We all share the responsibility of caring for those we serve — people living with, affected by or at risk of contracting HIV, TB and malaria. This includes respecting and protecting their rights and interests and promoting dignity, human rights and well-being in all Global Fund-supported programs.

IN THIS SECTION

We Protect and Promote Human Rights and Gender Equality
We Protect Against Sexual Exploitation, Abuse and Harassment
We Protect the Safety and Well-Being of Children

Halya, a single mother living with HIV, sits with her 12-year-old son Mykola – also HIV-positive – in a shelter at Okhmatdyt Hospital, Ukraine's largest children's hospital, during a Russian airstrike in November 2024. In May 2024, Mykola was urgently transferred to Okhmatdyt Hospital's HIV/AIDS clinic for treatment.
The Global Fund/Vladislav Musiienko



We Protect and Promote Human Rights and Gender Equality

We Contribute to a Healthier World When ...
We recognize our responsibility to promote human dignity and place it at the core of our work. Our efforts to end HIV, TB and malaria are centered on engaging meaningfully with marginalized communities, who are often vulnerable and lack access to health care. This is often due to stigma, gender inequality and discriminatory laws, policies and practices.

By requiring all Global Fund-supported programs to meet minimum human rights standards, we work to remove human rights and gender-related barriers to health. We champion the human right to health, put the communities we serve at the center, protect vulnerable populations and strive to create equitable access to health for all.



Community members representing different key populations in Durban, South Africa, march in support of the country's national strategy to remove human rights barriers to HIV and TB services and fight gender inequality. The banner on the right says, "No one will be left behind."
The Global Fund/Vincent Becker

We Embody Our Duty of Care by:

- Actively listening to and amplifying the voices of individuals from underrepresented groups, respecting all voices in discussions and decision-making processes.
- Applying a human rights and gender equity lens to our work by striving to dismantle human rights and gender-related barriers in all aspects of our work.
- When working on grant programs or initiatives with our implementing partners, considering how it may impact different groups, especially marginalized communities, and how to safeguard their safety, security and access to services.
- Supporting key populations and affected communities through Global Fund-supported programs, to understand and exercise their health-related rights.
- Staying alert to and mitigating emerging human rights risks.

Our Duty of Care Requires Us to:

- Model an inclusive workplace by treating everyone with respect and tolerance.
- Uphold our values and support our strategic objectives to maximize human rights and gender equality in programs supported by the Global Fund.
- Report any suspected or known human rights or gender equality violations in the workplace or in the context of Global Fund-supported programs to the Office of the Inspector General at hotline@theglobalfund.org or the Ethics Office at globalfundethics@theglobalfund.org.

Click the links for more information. Some are for internal use only and may require special access. Unlocking Resources | Policies & Procedures

We Protect against Sexual Exploitation, Abuse and Harassment

We Contribute to a Healthier World When ...

We act with integrity and compassion to protect our colleagues, our partners and those we serve from sexual exploitation, sexual abuse and sexual harassment (SEAH).

- **Sexual exploitation** is any actual or attempted abuse of a position of vulnerability, differential power or trust for sexual purposes, including but not limited to profiting monetarily, socially or politically from the sexual exploitation of another.
- **Sexual abuse** is any actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
- **Sexual harassment** is any unwelcome conduct of a sexual nature that might reasonably be expected or be perceived to cause offense or humiliation. Sexual harassment may involve any conduct of a verbal, nonverbal or physical nature, including written and electronic communications, and may occur between persons of the same or different genders.

Some examples of prohibited sexual practices include:

Sexual Exploitation	Sexual Abuse	Sexual Harassment
Taking advantage of a position of power for sexual purposes, such as conditioning access to economic opportunities on the performance of a sex act, or taking advantage of a person's vulnerabilities for sexual purposes, such as conditioning access to medicine or health services on the performance of a sex act.	Causing another person to engage in a sex act when that person cannot freely consent due to their age, their life situation or their relative physical strength; threatening another person with unwanted sex or threatening or using electronic images or video of a sexual nature to coerce, degrade, humiliate or retaliate.	Behaving in a sexual way that is unwanted and could make another person feel uncomfortable, through lewd or inappropriate comments, physical touch or gestures, or in online chats, text messages or email.

At the Global Fund, we have zero tolerance for inaction regarding SEAH. All individuals are expected to take action to prevent SEAH within their capacity and respond sensitively and effectively to allegations when disclosed.

We Embody Our Duty of Care by:

- Creating and maintaining a working environment that fosters the prevention of sexual misconduct in all its forms. Actively addressing sexual harassment in the workplace by setting a positive tone and intervening, if possible to do so safely, when you witness SEAH.
- Proactively recognizing and taking steps to mitigate power imbalances that may be exploited for sexual misconduct.
- Listening empathetically to and knowing how to direct a person in need toward appropriate resources for SEAH response.

Our Duty of Care Requires Us to:

- Never engage in sexual exploitation, abuse or harassment of any person and understand that acquiescence is not the same as consent.
- Never exchange money, employment, goods or services for sex acts while on a mission, when working outside Global Fund offices or representing the Global Fund.
- Report SEAH allegations witnessed by or disclosed to you to the Office of the Inspector General at hotline@theglobalfund.org or the Ethics Office at report.seah@theglobalfund.com.
- Respect the rights of victims/survivors if they ask to be anonymous and to not participate in an investigation by omitting their names and identifying information when reporting.

Click the links for more information. Some are for internal use only and may require special access. Unlocking Resources | Policies & Procedures

We Protect the Safety and Well-Being of Children

We Contribute to a Healthier World When ...

We recognize that children (anyone under the age of 18) are inherently more vulnerable to abuse than adults. We respect the principles of the United Nations Convention on the Rights of the Child and the International Labour Organization (ILO) Convention on the Worst Forms of Child Labour, which state that all children have a right to protection and freedom from abuse — including exploitation — regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity.

We take seriously the need for children to be safe from harm and abuse. Where our grant programs involve or impact people under the age of 18, we maintain standards to protect these children from any form of abuse, including sexual abuse, child labor, slavery and other forms of forced labor, child trafficking, child sexual exploitation, child pornography and use of children for other illicit activities in connection with grant activities that we fund.

We Embody Our Duty of Care by:

- Understanding that power imbalances make children more vulnerable to abuse.
- Proactively taking steps to mitigate these risks in our work and remaining aware of the principles of the United Nations Convention on the Rights of the Child and the ILO Convention on the Worst Forms of Child Labour.
- Integrating the principle of protecting a child's best interests in funding services or assistance to children, addressing structural barriers and protection of the child from discrimination or abuse.
- Increasing coverage and quality — and promoting and amplifying voices that support safe and healthy environments for children.



Mercy Zakaliya with her 9-month-old son, Precious, at the Baylor College of Medicine Children's Foundation in Lilongwe, Malawi. Born with HIV, Mercy has been on treatment since age 3, and Precious is receiving preventive medication to stay HIV-free.
The Global Fund/Tommy Trenchard

Our Duty of Care Requires Us to:

- Apply the principles of the Global Fund Child Protection Framework in connection with Global Fund activities and never use our position to pressure or manipulate children by offering or withholding money, jobs, goods, services or assistance in exchange for anything.
- Never participate in the production, distribution, importation, reception or possession of any depiction of sexually explicit conduct involving children.
- Never engage in any sexual activity with a child, or any other kind of abuse or exploitation of a child — regardless of the age of majority or age of consent in the jurisdiction where such activity takes place.
- Never engage in any form of discrimination based on a child's or their parent's or legal guardian's race, color, gender, sex, nationality, ethnic origin, age, religion or similar belief, language, political or other opinion or affiliation, sexual orientation, gender identity, family or civil status, disability or health status.
- Intervene, if possible to do so safely, when you witness abuse of or discrimination against a child.
- Immediately report any concerns or suspicions regarding child abuse or exploitation to the Office of the Inspector General at hotline@theglobalfund.org or the Ethics Office at report.seah@theglobalfund.com.

Click the links for more information. Some are for internal use only and may require special access.

Unlocking Resources | Policies & Procedures

MODEL INTEGRITY AND ACCOUNTABILITY

At the Global Fund, we are entrusted with considerable fiduciary responsibilities. Our commitment to the principles of integrity and accountability, while remaining free from fraud and corruption, guides our work.

Individuals are expected to promote and maintain constructive and respectful relationships between the Global Fund and its stakeholders. It is essential that all of us place the organization's interests and achievement of its mission above specific stakeholder interests — including those of donors and grant recipients — and never allow stakeholder interests to influence our professional judgment.

IN THIS SECTION

We Avoid Conflicts of Interest
We Conduct Our Work Honestly and with Integrity
We Act with Integrity When Offered or Offering Gifts
We Act with Impartiality and Independence

Dr. Patricia Akelo works as the Manager for External Quality Assessment at Uganda's National Health Laboratory Services. The Global Fund/Brian Otieno



We Avoid Conflicts of Interest

We Contribute to a Healthier World When ...
We safeguard the Global Fund's interests, integrity and reputation by avoiding actual, potential or perceived conflicts of interest. If we cannot avoid the conflict, we promptly disclose it so that it can be properly managed. Disclosing actual, potential or perceived conflicts demonstrates transparency and helps protect our integrity.

A conflict of interest may occur when an individual's personal activities, interests or relationships interfere with the performance of their role, their loyalty to the Global Fund or the integrity, independence and impartiality required of their position. Even if unintended, the appearance of a conflict can damage our organization's reputation and cause financial harm.

Examples of situations that may create a conflict of interest include:

Holding another job or role that interferes with your activities at the Global Fund, impairs your professional judgment, negatively impacts your job performance or risks use of Global Fund resources.

Financial Interests
You or a family member having a financial interest, including employment, in an actual or potential Global Fund grant recipient or supplier.

Family or Close Relationships
Participating in the recruitment, contracting, selection or performance management of a family member, romantic partner or close friend.

External appointments in your personal capacity to an organization that has or could have transactions with the Global Fund, competes with or takes actions that impact the Global Fund or has a mission contrary to the Global Fund's values.

We Model Integrity and Accountability by:

- Avoiding situations where there is, or may appear to be, a conflict between your personal interests and your responsibilities to the Global Fund.
- Maintaining transparency and integrity by immediately reporting any actual or perceived conflict of interest of which you become aware.
- Being transparent about your personal interests and disclosing any financial interests of yours or your family members related to your work at the Global Fund.
- Seeking guidance from the Ethics Office when you are unsure whether a situation may create a conflict of interest.



Drosella, a community health worker in Mubuga, Rwanda, tests families for malaria during home visits. These workers are trusted frontline caregivers in rural, hard-to-reach areas.
The Global Fund/Brian Otieno

Modeling Integrity and Accountability Requires Us to:

- Comply with the requirements of the Policy on Conflict of Interest.
- Promptly disclose to your manager and the Ethics Office any actual, potential or perceived conflicts of interest that cannot be avoided and refrain from potentially conflicting activities while they are under review.
- Make decisions in the best interest of the Global Fund and the communities and populations we serve — and never abuse your role for personal gain or non-Global Fund interests.
- Inform your line manager and the Ethics Office of any material changes in your situation after making a disclosure.

Click the links for more information. Some are for internal use only and may require special access. Unlocking Resources | Policies & Procedures

We Conduct Our Work Honestly and With Integrity

We Contribute to a Healthier World When ...

We are committed to upholding the highest standards of honesty and integrity in all aspects of our work. Fraud, corruption and other Prohibited Practices threaten the fight against epidemics by eroding public health institutions and systems, enabling human rights abuses and diverting funds, medicines and other resources away from countries and communities in need.

Some examples of prohibited practices include:

Bribery: Accepting or offering cash, gifts or favors to improperly influence decision-making, such as awarding contracts or securing services.	**Kickbacks:** Receiving a portion of a fee, payment or contract value in exchange for favoring a vendor or supplier.	**Facilitation Payments:** Requesting or accepting payments to expedite routine official tasks, such as processing permits or licenses.
Falsifying Documents: Altering or creating fake documents to support fraudulent claims, like inflating expenses or manipulating financial records.	**Procurement Collusion Practices:** Collaborating with others to rig procurement processes or manipulate competitive bidding to favor certain suppliers.	**Threats or Coercion:** Using threats of job loss, demotion or physical harm to force colleagues to engage in unethical or illegal activities.
Theft or Misuse of Resources: Stealing Global Fund property (such as office supplies) or using Global Fund monies (including corporate credit cards) for unauthorized personal expenses.	**Obstruction of Investigations:** Destroying or falsifying evidence, lying to investigators or intimidating witnesses during audits or investigations.	**Money Laundering Schemes:** Concealing the origins of illegally obtained funds through fake invoices, complex transfers or shell organizations to make the money appear legitimate.

Individuals should reference the Global Fund Policy to Combat Fraud and Corruption for more information on these and other Prohibited Practices.

We Model Integrity and Accountability by:

- Leading by example by following, respecting and communicating our policies, rules and procedures to prevent Prohibited Practices.
- Dealing with implementers and suppliers honestly and transparently.
- Watching for warning signs of unusual supplier activity such as a counterparty asking for cash payments, unusual payment terms, fees that exceed market rates for similar work or the involvement of a different person or company in the transaction without a valid explanation.
- Being alert for signs of abusive behavior that could undermine grants, such as data manipulation, product diversion, abuse of authority by decision-makers with competing interests or misappropriation of funds.

Modeling Integrity and Accountability Requires Us to:

- Comply with the Policy to Combat Fraud and Corruption.
- Never — directly or indirectly — participate, aid, abet or conspire with another in the facilitation or commission of any Prohibited Practice in connection with Global Fund activities.
- Never give, receive, request or promise anything of value that could be seen as an attempt to influence decisions unfairly.
- Immediately report any suspicion of a Prohibited Practice to the Office of the Inspector General at hotline@theglobalfund.org.

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We Act with Integrity When Offered or Offering Gifts

We Contribute to a Healthier World When ...

We maintain strict standards of care and accountability when we are offered or offer gifts. Gifts include any gratuity, favor, discount, entertainment, hospitality, loan, forbearance, honorarium or other item having monetary value. These include services as well as gifts of training, transportation, local travel, lodgings and meals, whether provided in-kind, by purchase of a ticket, payment in advance or reimbursement after the expense has been incurred.

We Model Integrity and Accountability by:

- Exercising good judgment and avoiding accepting gifts or invitations that could be seen as attempting to exert undue influence or that conflict with our obligations under this Code and applicable policies, rules and procedures.
- Avoiding the offer or acceptance of all gifts in connection with any funding or procurement decision.
- Informing our partners and third parties of our policy regarding gifts and hospitality.
- Seeking advice from the Ethics Office when you are unsure about accepting or offering a gift.

Modeling Integrity and Accountability Requires Us to:

- Comply with the Global Fund Policy on Conflict of Interest and the Policy to Combat Fraud and Corruption.
- Refrain from soliciting, accepting or offering gifts in relation to the performance of work activities yourself — or through others — unless covered by one of the exceptions outlined in the Policy on Conflict of Interest.
- Immediately report the offer or exchange of any gifts that do not conform to the Policy on Conflict of Interest to the Ethics Office at globalfundethics@theglobalfund.org to determine how the gift should be handled.

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We Act With Impartiality and Independence

We Contribute to a Healthier World When ...

We place the interests of the Global Fund and the achievement of its mission above specific stakeholder interests. It is essential that all of us follow applicable laws and regulations and avoid actions that could be seen as abusing the privileges and immunities accorded to the Global Fund by certain countries. The privileges and immunities individuals enjoy through the Global Fund are granted to serve the organization's purpose and carry out the functions entrusted to it.

We Model Integrity and Accountability by:

- Promoting and maintaining constructive and respectful relationships between the Global Fund and its stakeholders.
- Refraining from actions that support or oppose any political party or candidate when representing the Global Fund, avoiding the display of Global Fund-branded items (e.g., clothing or accessories) while participating in personal political activities and disclosing to the Ethics Office if you seek or are offered an appointment to a political or government role.

Modeling Integrity and Accountability Requires Us to:

- Use privileges and immunities granted to the Global Fund consistent with their purposes and limits.
- Comply with bilateral agreements between the Global Fund and a country's authorities.
- Act in the best interests of the Global Fund and its mission and not place specific stakeholder interests, including those of donors and grant recipients, above the best interests of the Global Fund.
- Never allow your personal political opinions and activities to interfere with our work or the policies, rules and procedures of the Global Fund.
- Never use Global Fund resources (including email, office space or work time) to promote any political party or candidate.

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CULTIVATE TRUST AND TRANSPARENCY

Trust and transparency are essential to our mission of combating HIV, TB and malaria and building a healthier, safer and more equitable future. These principles foster collaboration and commitment among our partners, donors and affected communities.

IN THIS SECTION

We Are Good Stewards of the Funds Entrusted to Us
We Protect Our Assets and Information
We Safeguard Confidential Information and Respect Privacy
We Are Responsible When Communicating

In Dar es Salaam, Tanzania, 17-year-old Nasri Kombo sought treatment for a persistent cough and night sweats from Hassan Juma Tingi, a traditional healer who has been trained to recognize TB symptoms by Mukikute, a local NGO. Hassan referred Nasri to a community health worker for treatment. The Global Fund/Nichole Sobecki/Panos



We Are Good Stewards of the Funds Entrusted to Us

We Contribute to a Healthier World When ...
We use donor funds effectively to achieve the organization's mission, optimize outcomes and recognize value for money. We maintain accurate books and records to demonstrate our organization's accountability and commitment to transparency.

We evaluate integrity risks in our supplier and grant recipient ecosystems, and we require supplier and grant recipient compliance with integrity standards. We monitor compliance with these standards to uphold public trust.

We Cultivate Trust and Transparency by:

- Managing resources wisely and avoiding waste of donor funds and reputational damage to the organization.
- Actively monitoring grant activities for compliance with Global Fund requirements.
- Incurring business expenses responsibly, making sure they are necessary and in line with the Global Fund's policies, rules and procedures.
- Using resources in an environmentally responsible manner and seeking to recycle, reduce waste and save energy in our work.

Cultivating Trust and Transparency Requires Us to:

- Maintain complete and accurate financial records, providing proper supporting documentation required by Global Fund policies, rules and procedures.
- Adhere to the Global Fund's financial, procurement and grant-related policies, rules and procedures.
- Seek reimbursement only for legitimate, acceptable business expenses.

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We Protect Our Assets and Information

We Contribute to a Healthier World When ...
We protect and conserve Global Fund property, assets and information to further our mission.

Assets include tangible items such as equipment, computers, software, supplies and other property entrusted to or issued by the Global Fund. Assets also include intangible items, such as information, individual time, IT systems, networks and intellectual property. All work produced by an individual during their Global Fund employment belongs exclusively to the organization.

We Cultivate Trust and Transparency by:

- Handling and treating our organization's assets with care to prevent theft, damage or misuse.
- Supporting sustainability by using resources responsibly and recycling, reducing waste and saving energy whenever practicable.
- Safeguarding intellectual property, including patents, trademarks, copyrights and trade secrets.
- Being careful with unsolicited emails and never clicking on unverified links or attachments.
- Avoiding the use of personal email accounts, unapproved devices and unauthorized software for any Global Fund-related work.
- Completing all relevant cybersecurity training and applying the knowledge gained from these courses in our daily work.



Paul Okware is the Chief Stores and Operations Officer at the National Medical Stores warehouse in Entebbe, Uganda. With support from the Global Fund and other partners, the facility holds and distributes essential health commodities including medicines, diagnostics and 14 types of vaccines to more than 3,500 health facilities across the country.
The Global Fund/Brian Otieno

Cultivating Trust and Transparency Requires Us to:

- Use assets responsibly and secure them to prevent theft, damage or unauthorized access.
- Limit personal use of Global Fund assets, particularly the internet, email and telephone, to a reasonable amount that does not disrupt the work environment or conflict with the interests of the Global Fund.
- Safeguard all forms of information by following our established procedures for managing, storing, sharing and disposing of information and data, in both digital and physical formats.
- Promptly report any loss, damage or misuse of our assets or information to the appropriate department.

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We Safeguard Confidential Information and Respect Privacy

We Contribute to a Healthier World When ...

We are committed to safeguarding the security of any restricted, confidential or highly confidential information. We are committed to respecting the privacy of individuals. This includes being transparent about how we use personal data, respecting individuals and protecting personal information.

We Cultivate Trust and Transparency by:

- Being mindful of your surroundings when discussing Global Fund restricted, confidential and highly confidential information and refraining from discussing sensitive matters in public areas or unsecured environments.
- Promptly completing training on data classification, confidentiality, data privacy and information governance and applying these practices in your daily work.
- Properly classifying, storing and disposing of all documents and records by following the Global Fund's information and data policies, rules and procedures.



Patient records at Gisenyi District Hospital in Rwanda.
The Global Fund/Brian Otieno

Cultivating Trust and Transparency Requires Us to:

- Use, share, store and secure confidential information, in compliance with our policies and procedures, knowing that these obligations remain in effect even after employment by the Global Fund has ended.
- Refrain from disclosing confidential information to any individual, internally or externally, who does not have a legitimate business interest to know the information, including after separation from the Global Fund.
- Immediately report any suspected or actual loss, breach or unauthorized access to restricted, confidential, highly confidential or personal data to https://theglobalhealthcampus.service-now.com/service_management.
- Take steps in accordance with our policies, rules and procedures to monitor third parties who handle our restricted, confidential or highly confidential information or personal data.

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We Are Responsible When Communicating

We Contribute to a Healthier World When ...
We prioritize clear, truthful, accurate and professional communication when carrying out our work and when representing the Global Fund, whether speaking publicly, engaging with the media or using social platforms.

Communicating about the work of the Global Fund is an important part of donor stewardship and reputation management. With the exception of the Executive Director and members of the Management Executive Committee, individuals should obtain clearance from the Communications Department prior to speaking, commenting or publishing on behalf of the organization.

If it is not possible to obtain prior clearance, individuals should redirect requests for comment to the Communications Department.

We Cultivate Trust and Transparency by:

- Taking steps to make sure all internal or external communications are accurate, professional and respectful and uphold the integrity of the Global Fund.
- When using social media, being mindful of how our posts may impact the Global Fund's reputation and operations.
- Directing media inquiries to the Communications Department to maintain consistent, accurate and authorized messaging about the Global Fund.
- Making it clear, when expressing personal opinions in public forums or on social media, that you are speaking in an individual capacity and not on behalf of the Global Fund.



Hannatou Abdou, a mother of four, has been a community health worker in Danja, northern Nigeria, since 2001. She was one one of the first to distribute seasonal malaria chemoprevention, dedicating her life to protecting local children from malaria.
The Global Fund/David O'Dwyer

Cultivating Trust and Transparency Requires Us to:

- Follow our Social Media Guidelines.
- Refrain from making disparaging public statements about the Global Fund, its current and former employees, donors, partners, stakeholders and members of the Board and Board Committees of the Global Fund.
- Provide the Global Fund with truthful, accurate and timely information when carrying out our work and when disclosure of information is mandated by the Global Fund's rules and regulations.
- Never intentionally omit or misrepresent information that is relevant to decision-making.
- Immediately report any unauthorized or inappropriate communication that could harm the Global Fund's reputation or breach confidentiality to the Ethics Office, globalfundethics@theglobalfund.org.

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