



**Pan American
Health
Organization**
Regional Office of the
World Health Organization

Presented to the 46th Directing Council (CD46/28)

Code of Ethical Principles And Conduct

Approved by the Director of PAHO



The United Nations and the specialized agencies embody the highest aspirations of the peoples of the world. Their aim is to save succeeding generations from the scourge of war and to enable every man, woman and child to live in dignity and freedom.

The international civil service bears responsibility for translating these ideals into reality. It relies on the great traditions of public administration that have grown up in member States; competence, integrity, impartiality, independence and discretion. But over and above this, international civil servants have a special calling: to serve the ideals of peace, of respect for fundamental rights, of economic and social progress, and of international cooperation. It is therefore incumbent on international civil servants to adhere to the highest standards of conduct; for ultimately, it is the international civil service that will enable the United Nations system to bring about a just and peaceful world.

Standards of Conduct for the International Civil Service, 2001

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I. SAFEGUARDING PAHO'S PRINCIPLES AND VALUES

A. INTRODUCTION

The Pan American Health Organization (hereinafter called PAHO or the Organization) is a public international organization composed of Member States. PAHO promotes and coordinates efforts of the countries of the Western Hemisphere in combating disease, lengthening life, and promoting the physical and mental health of the people.

To achieve its purposes, PAHO must support an internal environment that nurtures its staff and encourages trust, open communication and consensus building. This Code of Ethical Principles and Conduct should guide your day to day decisions to ensure that your actions support our mission and demonstrate our values.

A healthy organization is transparent. Trust, openness and respect are major ingredients. As international civil servants, we at PAHO have been entrusted with a special calling to serve the ideals of peace, economic and social progress, international cooperation, and respect for fundamental rights.

It is incumbent upon us to continually earn the international community's trust. This responsibility cannot be taken lightly. Their trust is based on how we treat each other at every level of the Organization and in our interactions with Member States, collaborators and suppliers. To accomplish our health initiatives, we must be conscious of the impact (positive or negative) that our words and actions have on the well being of our Organization.

This Code, together with the relevant provisions of PAHO's Staff Regulations and Rules and the International Civil Service Commission's *Standards of Conduct for the International Civil Service*, establish the values, principles, standards and ethics of international civil service in our Organization and are intended to guide and support you in your conduct, decisions and activities. Together, these documents will also serve to enhance public confidence in the integrity of PAHO and strengthen respect for, and appreciation of, the role played by the Organization within the international community.

B. PAHO'S ETHICAL PRINCIPLES

This Code is founded on basic principles of ethical behavior and is consistent with the *Standards of Conduct for the International Service* and the Charters of the United Nations and Organization of American States. Those principles are:

- Loyalty to the Organization's goals and mission and to the United Nations system;
- Integrity, honesty and impartiality in actions and decisions that may affect PAHO;

- Transparency and fairness;
- Respect for the dignity, worth and equality of others;
- Independence from outside authorities; and
- Tolerance for different cultures and perspectives.

These basic principles are the guideposts against which our ethical behavior and conduct is measured. Consequently, you must take an active role in upholding these principles in your day-to-day activities.

C. **OBJECTIVES OF THIS CODE**

This Code establishes what PAHO expects of you and what you can expect from PAHO. It describes our values and principles. This Code describes procedures to help you make ethical decisions and report and deal with violations of our values, principles, rules, and policies. To help you better use this Code, key words will be *highlighted* when they are first used and defined.

This Code will help you:

- Resolve doubts related to conduct and ethical behavior in the workplace;
- Obtain confidential advice;
- Understand how all of the Organization's policies and procedures regarding conduct and ethics apply to you;
- Feel confident that your conduct in dealings with people both inside and outside of the Organization (such as governments, private businesses, business partners, vendors and suppliers) is appropriate and ethical; and
- Bring suspected violations of the Code and other relevant Organization policies and procedures to the attention of the appropriate persons in PAHO.

Your adherence to this Code of Ethical Principles and Conduct represents a personal and professional commitment to PAHO's values of equity, excellence, solidarity, respect and integrity.

D. **APPLICABILITY**

This Code applies to everyone who works in a PAHO workplace, regardless of the type of contract held or the duration of appointment. By *workplace* we mean anywhere the Organization's work takes place or where we meet at the direction or invitation of the

Organization. At the time you signed your appointment letter accepting employment with PAHO, you acknowledged that compliance with PAHO's rules and policies constitute conditions of your employment with the Organization. Consequently, you are expected to know and comply with this Code as well as other PAHO policies, regulations and provisions that govern your conduct in the Organization, including:

1. Article I of PAHO's Staff Regulations pertaining to the duties, obligations and privileges of staff members;
See: <https://intranet.paho.org/AM/HRM/StaffRulesEnglishJul2003.pdf>
2. Staff Rule 110 dealing with the standards of conduct of staff members;
See: <https://intranet.paho.org/AM/HRM/StaffRulesEnglishJul2003.pdf>
3. The International Civil Service Commission (ICSC) *Standards of Conduct for the International Civil Service*.
See: <http://icsc.un.org/resources/pdfs/general/standards.pdf>

While this Code does not apply to PAHO's suppliers, vendors, contractors, and business partners working outside of our workplace, PAHO expects that they will familiarize themselves with our Code and support effective conduct and ethics initiatives.

This Code is effective as of 23 September 2005.

E. ACKNOWLEDGEMENT AND AGREEMENT

An Acknowledgement and Agreement form is included at Appendix 1 to this Code. If you work for PAHO, regardless of the type or duration of your contract, you must sign this form annually and return it to PAHO's Ethics Officer. This form will be used to ensure that you have read, understood and agreed to follow this Code.

II. ETHICAL FRAMEWORK

A. MAKING ETHICAL DECISIONS

If you are having a difficult time deciding about your own conduct or if you are unsure if the actions of others are in compliance with this Code, answering these questions may help you determine the right course of action:

- Are my actions consistent with PAHO's values?
- Do I have all of the facts?
- Have I reviewed the facts carefully?
- Who will benefit from my actions?
- What is the best decision for PAHO?
- How will my decision reflect on PAHO?
- What are the consequences of my choices?
- How will my actions look to others?
- Would I want my actions widely publicized?
- Am I following the spirit as well as the letter of PAHO's rules or policies?

Never hesitate to ask questions, express concerns or make reports. The more we talk about the ethical principles and conduct outlined in this Code, the clearer everyone will be about what is expected. Feel free to consult your managers or supervisors if you are unsure about a decision, or consult any office or advisory body within our Integrity and Conflict Management System (ICMS). You are not expected to have all the answers to ethical issues that may come up in the course of doing your job, but you are expected to ask for help if you have any doubt about what to do.

B. THE INTEGRITY AND CONFLICT MANAGEMENT SYSTEM (ICMS)

The Organization will establish an *Integrity and Conflict Management System (ICMS)* which identifies, describes and integrates the offices, advisory bodies and mechanisms that handle staff inquiries, concerns, complaints and investigations into alleged misconduct or violations of PAHO's rules and procedures (a detailed description of the roles and responsibilities of ICMS entities is available at ***HYPERLINK TO BE PROVIDED***). By organizing, integrating and managing its integrity and conflict management resources into a single System, we will be better able to:

- Raise and handle concerns at the earliest opportunity, thus preventing and addressing systemic issues ;
- Establish consistent and clear standards about conduct, ethics and compliance;
- Ensure consistent procedures for handling inquiries, complaints, allegations, and investigations;
- Provide multiple confidential channels to ask questions, get advice and speak up about concerns; and
- Provide education and training.

➔ **ICMS Ethics Resources**

The Integrity and Conflict Management System provides you with several access points or *ICSMS Ethics Resources* inside and outside the Organization to assist with your ethical concerns. You can turn to any of these resources if you have a question, need advice, or wish to make a report about possible unethical behavior or misconduct. What is most important is that you feel comfortable getting the assistance you need.

- The Ethics Office;
- The PAHO Integrity HelpLine 1-888-448-4715;
- The Office of the Ombudsperson;
- The Office of Legal Counsel;
- The Area of Human Resources Management;
- The Office of Internal Audit;

You may use any of these resources at any time or you may choose to speak to a manager or supervisor. If necessary, you may be referred to another person or office to ensure that your specific concerns are addressed.

➔ **PAHO'S Ethics Officer**

A key component of PAHO's Integrity and Conflict Management System is PAHO's independent Ethics Officer, who reports directly to PAHO's Executive Committee. While you will still have the option of requesting guidance or assistance from any of our other ICMS ethics resources, the Ethics Officer plays a coordinating role and is responsible for:

- Promoting compliance with PAHO's ethical standards;

- Providing training regarding this Code;
- Responding to questions regarding what constitutes appropriate conduct;
- Ensuring that PAHO's policies and standards regarding ethical conduct are current;
- Ensuring that all staff sign and return the Code's Acknowledgment and Agreement Form (Appendix 1);
- Ensuring that inquiries and complaints received through PAHO's Integrity Helpline are promptly addressed;
- Ensuring enforcement of this Code's prohibition against retaliation;
- Carrying out formal investigations of misconduct in order to ensure consistency and neutrality in the investigative process;
- Managing PAHO's Declaration of Interest reporting program; and
- Maintaining confidentiality.

➔ PAHO'S Integrity Helpline

In order to provide you with a confidential avenue for asking questions and reporting alleged violations of this Code, the Organization has established an Integrity Helpline which will be accessible to all staff. All calls to the Helpline are confidential, and you can also opt to remain anonymous. The Integrity Helpline is a toll free call, available throughout PAHO Member States and managed by the Ethics Officer.

III. CREATING A CULTURE OF COMPLIANCE AND PREVENTION

A. PAHO'S PRIVILEGES AND IMMUNITIES

The privileges and immunities accorded the Organization by its Member States are intended not for your personal benefit, but to safeguard the independent exercise of your official functions in connection with the Organization. Accordingly, the Organization has the right to waive the immunity of any staff member in any case where, in its opinion, the immunity would impede the course of justice and such immunity can be waived without prejudice to the interests of the Organization.

B. RIGHTS, RESPONSIBILITIES AND OBLIGATIONS

➔ All Staff Members and Individuals Employed in PAHO

If you work for PAHO, you must:

- Sign and submit the Code's Acknowledgment and Agreement Form (Appendix 1) to the Ethics Officer;
- Follow applicable rules and regulations and maintain the political neutrality of international public service;
- Give honest and impartial advice and make that information available to a decision maker;
- Ensure proper, effective and efficient use of the Organization's resources;
- Ensure transparency while respecting the obligation to maintain confidentiality;
- Perform your duties and arrange your private affairs so that confidence and trust in the integrity, objectivity and impartiality of PAHO are conserved and enhanced;
- Avoid even the appearance of impropriety in all your actions, conduct, and decisions;
- While fulfilling your official duties and responsibilities, make decisions that are in the best interests of the Organization and based on objective criteria;
- Encourage, advocate and promote appropriate conduct and ethical behavior in the workplace, and implement, monitor, and enforce PAHO's Code and related policies in your own day-to-day work;

- Encourage PAHO's partners to review this Code and to join PAHO in upholding it;
- Acknowledge that any person who wants to raise issues related to this Code has the right to do so and may approach any ICMS ethics resource without first discussing the matter with his or her supervisor or manager.

➔ **Managers and Supervisors in PAHO**

If you are a manager or a supervisor you must also:

- Uphold this Code and ensure you exhibit the highest level of ethical conduct at all times;
- Be familiar with this Code and be able to explain to your staff their rights, responsibilities and obligations;
- Encourage and allow your staff to participate in training activities sponsored by the Organization on ethical issues; and
- Handle confidentially and expeditiously any reported violation of this Code that may be brought to your attention, and ensure that others act accordingly.

➔ **The Organization**

For its part, the Organization must:

- Provide staff with a copy of this Code and advise that they are required to read, understand and adhere to the Code as part of their employment contract with the Organization;
- Brief new staff on the Code during orientation sessions and provide current staff with initial and recurrent training opportunities regarding the Organization's ethical standards;
- Handle in confidence all reported violations of the Code;
- Take timely action to investigate and respond to reported violations;
- Take appropriate administrative or disciplinary measures in response to violations of the Code;
- Ensure that anyone who reports a suspected violations of the Code is not subject to retaliation;

- Ensure that mechanisms and assistance are in place to help staff raise, discuss and resolve issues of concern related to the Code; and
- Encourage and maintain an ongoing dialogue on values, conduct and ethics in order to address specific issues and challenges as they arise within the Organization.

C. DUTY TO COMPLY

PAHO places the utmost importance on the ethical conduct of everyone under its employ, and will not tolerate any violation of this Code or other policies, regulations and provisions governing conduct within the Organization. Obeying this Code –both in its spirit and its letter- is the foundation on which our ethical standards rest. Each of us has a duty to comply with PAHO’s rules and the laws of the nations in which we operate.

→ Disciplinary Measures

If you fail to observe the provisions of this Code, or any standards of conduct outlined in Article I of PAHO’s Staff Regulations; Staff Rule 110; or the ICSC *Standards of Conduct for the International Civil Service*, you will be subject to disciplinary measures. Depending on the gravity of the offense, you may be subject to one or more of the following disciplinary actions:

- Written reprimand;
- Withholding of within-grade salary increase;
- Suspension from duty without pay;
- Reassignment with or without reduction in grade;
- Dismissal for misconduct; and/or
- Summary dismissal for serious misconduct.

D. REPORTING

You are encouraged to report known or suspected violations of this Code through any of the ICMS ethics resources. You may also report information received from others regarding a suspected violation.

→ Confidentiality

We will take all appropriate steps to ensure that reports or concerns are handled confidentially, but it is possible that the obligation to investigate or address violations

will override your wish for confidentiality, when for example, a person's physical safety or well-being is at stake.

E. INVESTIGATIONS

All reported violations of this Code will be investigated as promptly, thoroughly and confidentially as possible, in accordance with our written procedures. Investigations will generally be conducted by the Ethics Officer, although he/she may determine that another PAHO office (for example, the Legal Office, Internal Audit, Information Technology, Human Resources Management) should conduct or assist in the investigation. If necessary, the Ethics Officer may bring in outside investigators or counsel to assist in the investigation. When appropriate, the Ethics Office will advise, in writing, the person making the report about the status of the investigation.

➔ Duty to Cooperate

You must cooperate fully in informal or formal investigations of any alleged violation of this Code. You may not destroy or alter any documents, lie to or mislead investigators, or prevent collection of any information.

F. PROHIBITION AGAINST RETALIATION

It is a violation of this Code to retaliate against anyone who reports possible unethical behavior or misconduct to Organization authorities. "***Retaliation***" means harm done to persons in retribution for raising good faith concerns in the workplace.

IV. STANDARDS OF CONDUCT

A. CONDUCT AFFECTING THE WORKPLACE

➔ Cultural Sensitivity

As a multicultural organization, PAHO is committed to diversity and equality. We support the right of all to express their individual cultural heritage, including languages and religions. PAHO will not tolerate discrimination or lack of respect for any culture. You must be sensitive to the cultures of the countries where you work and understand local customs, including those involving personal behavior. You have a duty to contribute to the effective functioning of the workplace by treating colleagues and the public at large with genuine respect. By virtue of PAHO's international character, you must be particularly sensitive to different cultural backgrounds, beliefs and opinions of people both inside and outside of the workplace.

➔ Respect for Colleagues and Others

PAHO's *Policy on the Prevention and Resolution of Harassment in the Workplace* prohibits discrimination against or harassment of persons working within PAHO. Harassment makes the workplace unpleasant, humiliating or intimidating for the person or group targeted and reduces the effectiveness of everyone. You must treat all persons working in the Organization with dignity and respect.

Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature constitute sexual harassment when this conduct explicitly or implicitly affects employment, unreasonably interferes with work performance, or creates an intimidating, hostile, or offensive work environment. Such conduct will not be tolerated in PAHO.

PAHO's *Policy on the Prevention and Resolution of Harassment in the Workplace* provides you with both informal and formal means of resolving complaints of harassment. You can review PAHO's *Policy on the Prevention and Resolution of Harassment in the Workplace* at: <http://intranet.paho.org/Display.asp?RecID=20600>.

➔ Respect for National Laws

You must respect the laws, local regulations and cultural mores of the country where you are working. You should pay particular attention to laws and directions governing bank accounts, currency dealings, purchase and disposal of motor vehicles, and traffic violations. You must also satisfy all outstanding locally incurred financial debts prior to completing your posting or assignment.

Moreover, while certain behavior and conduct may be acceptable in one country, they may prove illegal or inappropriate in other countries. In particular, sexual activities and the use of alcohol or drugs are sensitive areas which may easily be seen as offensive and

require you to ensure appropriate personal behavior in the local context. You are expected to observe the highest standards wherever you are working.

→ Personal Obligations

You are solely responsible for the consequences of your failure to meet private legal or financial obligations (including payment of debts, taxes, rents, and spousal or child support obligations) or your failure to comply with applicable local laws. The privileges and immunities attaching to PAHO are conferred in the interest of the Organization alone, and furnish no excuse for you to avoid private obligations or breach national laws or regulations. Failure to do so is a violation of this Code subject to disciplinary or administrative action.

→ Domestic Employees

Domestic employees may either be local residents of the country where you are working or foreign nationals under restricted visa arrangements for the specific purpose of providing personal services to you and/or your spouse. At all times you must comply with relevant standards regarding employment of locally-hired domestic employees. If you are a staff member with a PAHO-sponsored domestic employee, you must submit a copy of a written employment contract to Human Resources Management (HRM), maintain proper employment records, and file annual statements summarizing wage payments made during all calendar years. Domestic employees must also sign these statements.

→ Romance in the Workplace

Consensual intimate relationships between colleagues should not interfere with your work or create an environment where other persons working in the Organization might feel uncomfortable or disadvantaged as a result of your relationship. In cases where there is a hierarchical relationship as well, one of the persons involved must request reassignment or transfer to a different work unit.

→ Violence in the Workplace

PAHO strives to provide a safe work environment for all staff and will never tolerate violence or threats of any kind committed by or against someone working for PAHO. Additionally, the carrying of weapons on PAHO property, in PAHO vehicles, or any place where PAHO conducts business is strictly prohibited. This prohibition does not extend to host government law enforcement officials or authorized professional security personnel at duty stations.

→ Drugs and Alcohol Abuse

PAHO workplaces shall be free from illegal drugs and alcohol abuse. Staff must always be able to perform their duties free from the effects of prohibited drugs or alcohol.

Consequently, you must avoid any such behavior that prevents you from performing your duties and work objectives, or that might bring the Organization's reputation into disrepute.

With respect to business related meetings or social gatherings where alcohol is served, you must remember that you represent PAHO and act responsibly.

If you have concerns or questions about drug or alcohol abuse, you may seek confidential assistance through PAHO's Employee Assistance Program by calling 1-800-765-0770. Assistance is available in both English and Spanish to all staff at PAHO Headquarters as well as to staff in PAHO's country offices and centers.

➔ **Conduct of Family and Household Members**

This Code does not extend to your immediate family or household members. However, their actions can impact the Organization's reputation and your ability to perform your duties. Your immediate family or household member's conduct within the PAHO workplace or at official functions must conform to the ethical principles enunciated in this Code. Persistent or serious misbehavior or breach of local laws by a family or household member, or interference in official PAHO business, may result in the termination of your posting.

B. CONFLICT OF INTERESTS

➔ **Overview**

A "*conflict of interest*" occurs when your financial interests, business or social commitments, or personal or business relationships could reasonably interfere -or appear to interfere- with your ability to make fair and impartial decisions regarding the work of the Organization. Even if there is no evidence that you have done something improper, a conflict of interest can create an appearance of impropriety that can undermine confidence in your ability to act properly or damage the reputation of the Organization. Avoiding and preventing even the appearance of a conflict of interest is one of the primary means by which you can maintain public confidence in the impartiality and objectivity of the Organization. A "conflict of interest" exists when, for example:

- There is a clash between your personal or private interests and your official public responsibilities;
- You engage in a business or personal relationship that may not be in the best interests of the Organization;
- You or your family have a business interest in an enterprise (possibly family owned) which could compromise your loyalty to the Organization;

- Someone might reasonably question whether your official public actions or decisions are influenced by your personal or private interests or the interests of someone closely related to you by blood or marriage, friends or individuals with whom you have a significant relationship or affiliation outside of PAHO;
- You are in a position to use your contacts or position in the Organization to advance your personal or private interests or those of someone closely related to you by blood or marriage, friends, former colleagues or individuals with whom you have a significant relationship or affiliation outside of PAHO;
- You award a contract to an individual with whom you share personal or private relations, such as someone closely related to you by blood or marriage, friends, former colleagues or individuals with whom you have a significant relationship or affiliation with outside of PAHO.
- You offer or accept payment back to you (e.g. kickback), directly or indirectly, of a portion of the purchase price by the seller to induce purchases, concessions, commissions and/or bonus; or may benefit from someone in the hopes of ensuring a particular decision or improperly influence future purchases.

Any conflict of interest or even the appearance of a conflict of interest must be resolved in favor of the Organization.

➔ **Disclosing Conflicts of Interest**

If you think that a real or apparent conflict of interest may exist, or if you have any doubts in this regard about:

- (a) Your personal or private interests;
- (b) The interests of someone *closely related to you by blood or marriage*; or
- (c) The interests of friends or individuals with whom you have a significant relationship or affiliation outside of PAHO;

then you must immediately disclose all of the relevant facts to your manager or supervisor or any of the ICMS ethics resources, before participating in any activities or taking any decision about issues at hand. The Organization has the responsibility to conduct a timely evaluation of any real or apparent conflict of interest disclosed, and promptly inform you of its decision.

A person is “*closely related to you by blood or marriage*” if they are your mother, father, brother, sister, son, daughter, father-in-law, mother-in-law, son-in-law, daughter-in-law, sister-in-law, brother-in-law, grandmother, grandfather, grandson, granddaughter, uncle, aunt, nephew, niece, husband, wife, step-parent, step-child, step-brother, step-sister, guardian or ward.

Employment applicants may be asked to declare any real or apparent conflicts of interest. Before entry into the Organization, successful applicants may be required to divest any such interests to avoid conflicts.

➔ **Declaration of Interests**

You must carefully evaluate on a regular basis whether your interests, as well as those of immediate family members comply with the conflict of interest provisions of this Code. The term “*immediate family member*” means your spouse, children, parents and siblings and the children, parents and siblings of your spouse. In doing so, you must take into account the nature of your official duties and the characteristics of your interests as well as those of your immediate family members.

You must immediately inform the Ethics Officer in writing if you or your immediate family members have any interest in or association with any entity with which you may be required to have official dealings on behalf of the Organization, or which have a commercial interest in the Organization’s work or common areas of activity with the Organization.

You must also report any interest or association with entities whose policies, practices, or interests conflict with those of the Organization, such as the tobacco industry and manufactures of guns or other weapons.

In addition to the above, staff in specific employment categories designated by the Director of PAHO shall report annually to the Ethics Officer using PAHO’s Declaration of Interest Form as to whether they or their immediate family members have any of the above referenced interests or associations. The categories of staff designated to submit such Declaration of Interest Forms, including those on acting appointments, are:

- Executive Directors;
- Area Managers;
- Unit Chiefs;
- All other staff at grade P6/D1 and above (inclusive) – referring to the grade of the person not the grade of the post;
- All professional staff in Procurement and Human Resource Management.

➔ **Divestment of Interests**

If you are advised by the Organization that a conflict of interest exists and that you must divest yourself of a particular interest, you will be required to do so within 120 calendar days of being told to do so and must provide the Ethics Officer with evidence of the divestment. Furthermore, you must do so through an arm’s length transaction, meaning a

transaction conducted with someone who is acting independently of your own interests. Consequently, you may not sell or transfer financial interest, including personal assets, to an immediate family member for purposes of circumventing the compliance measures outlined above.

➔ **Abstaining Where a Conflict of Interest Exists**

If you have a conflict of interest, you may not participate in any recommendation or decision that would directly or preferentially benefit your personal, financial or professional interests, the interests of someone closely related to you by blood or marriage, friends, former colleagues or individuals with whom you have a significant relationship or affiliation outside of PAHO .

➔ **Waiver of Conflict of Interest**

Only PAHO can waive real or apparent conflicts of interest if it, at its sole discretion, determines that:

- The situation is unlikely to adversely impact the best interests of the Organization;
- The conflict of interest is so remote or insignificant that it cannot reasonably be regarded as likely to influence you; or
- The interests of PAHO outweigh the concern that a reasonable person may have regarding the integrity and/or objectivity of the activity in question.

The measures outlined below are intended to minimize the possibility of a real or apparent conflict. Conflict of interest issues are particularly fact specific. As a result, it is not possible to describe every conceivable situation that could give rise to a conflict of interest. It becomes your responsibility to disclose the facts of any such situation and seek guidance if you harbor any doubt.

➔ **Conflicts Due to Personal and Business Relationships**

You may not use your position with PAHO for any private gain or personal benefit, the endorsement of any products, service or businesses, or for the private gain of any person closely related to you by blood or marriage, friends, former colleagues or individuals with whom you have a significant relationship or affiliation outside of PAHO.

Specifically, you may not directly or indirectly cause the Organization to enter into contracts with:

- Any persons:
 - closely related to you by blood or marriage;

- with whom you are involved in a significant personal relationship; or
- Companies, entities, organizations or associations where:
 - anyone closely related to you by blood or marriage or with whom you are involved in a significant personal relationship was previously or is currently an officer, director, owner, trustee, general partner, agent, attorney, consultant, contractor or employee;
 - someone with knowledge of relevant facts could reasonably question your impartiality in causing the Organization to enter into the contract.

In all instances, you must ensure that your procurement actions comply with PAHO's Procurement Procedures Manual, which you can view and download at: <https://intranet.paho.org/AM/PRO/PRO.asp>. If you have questions or doubts regarding contracting situations that may affect, or be perceived as affecting, your objectivity or impartiality, you must consult with any of the ICMS ethics resources.

➔ **Hiring of Spouses and Family Members**

The Organization may employ your spouse if, after conducting a competitive selection process, your spouse is the best candidate.. However, your spouse may not serve in the same unit as you and cannot be in a supervisory or subordinate position to you.

The Organization will not normally employ a person who is closely related to you by blood or marriage. If you become aware that a person closely related to you by blood or marriage, has applied for a position with the Organization, you must immediately advise the Area of Human Resources Management.

However, under no circumstance may you participate in any activity that involves the hiring, advancement, promotion or evaluation of your spouse or of anyone who is closely related to you by blood or marriage or with whom you are involved in a significant personal relationship.

➔ **Gifts from Sources Outside of PAHO**

Gifts given to you by anyone outside the Organization for activities and/or events related to your official duties may only be accepted if:

- The gift is infrequent and of minimal value (low-cost promotional objects, simple meals, souvenirs with no cash value); and
- The gift does not compromise or in any way appear to compromise your integrity or that of the Organization.

Otherwise, you may not, directly or indirectly, solicit or accept any gift from anyone outside the Organization who may be in a position to influence your objectivity in carrying out your official duties or that may place you under obligation to the person giving the gift.

The term “*gift*” includes any cash, gratuity, favor, discount, entertainment, admission to sporting and cultural events, hospitality, loan, or any other benefit or item having monetary value. Such shall include services and/or gifts of training, transportation, travel, lodgings and meals, whether provided in-kind, by purchase of a ticket, payment in advance, or reimbursement after the expense has been incurred.

An “*indirect gift*” means a gift given with your knowledge and acquiescence to someone closely related to you by blood or marriage, or someone with whom you have a close personal relationship, because of that person’s relationship to you. Indirect gifts also include gifts given to persons or entities, including any charitable organizations, based on your designation, recommendation, or direction.

If it is not possible to decline a gift or if there is sufficient benefit to the Organization to warrant acceptance of a gift, you must immediately seek written direction from the Ethics Officer, who will notify you in writing as to whether you or the Organization can keep the gift, whether the gift must be declined, or whether the gift can be donated to charity or must otherwise be disposed of.

➔ **Gifts between People Working for PAHO**

As a general rule, you may not directly or indirectly give gifts to or solicit contributions from another person for gifts, or make donations towards gifts for a supervisor or an individual in a position of authority.

You may give gifts to or accept gifts from other persons working in PAHO only if each of the following circumstances is satisfied:

- You and the other person are not in a supervisor-supervisee relationship. Still, you may give gifts appropriate to the occasion to your supervisor or accept gifts from someone you supervise;
 - In recognition of infrequently occurring occasions of personal significance such as marriages, illnesses, or births or adoptions of children; or
 - Upon occasions that terminate the supervisor-supervisee relationship, such as retirements, resignations, or transfers.
- There is a personal relationship between you that would justify such gifts;
- Gifts are of nominal value; and

- Gifts are given on special, infrequent occasions.

➔ **Awards and Honorary Decrees**

You may accept awards from outside sources provided that such are not accompanied by any form of cash payments, investment interests, or gifts with more than nominal values. Otherwise, you must have written authorization from the Ethics Officer.

You may accept honorary degrees from institutions of higher education provided that the timing of the award of such degree does not call into question your impartiality in matters affecting the Organization.

In accepting awards or honorary degrees, you may also accept meals and entertainment given you and members of your family at the event at which presentations of such awards or degrees takes place.

➔ **Relations with Governments and Political Activity**

While you clearly have an obligation to maintain the best possible relations with Governments of PAHO Member States, you should not interfere with their policies or affairs. In order to maintain the impartiality of the international civil service, you must remain independent of any authority outside of the Organization and your conduct must reflect that independence. For this reason, you may not seek or obtain, under any circumstance, instructions or assistance from any Government official or from any other authority external to the Organization, particularly in an attempt to:

- Interfere with the internal deliberations of the Organization;
- Change a possibly unfavorable action or decision, such as non-renewal of your employment contract, or your separation or termination from the Organization; or
- Obtain any promotion, benefit or any other type of advantage.

Likewise, you must refrain from actions that could be viewed as critical or intended to discredit a Government, or that might interfere with Governmental policies or affairs.

Because of the independence and impartiality of international civil service, you may not participate in political activities, including running for or holding local or national political office, while you are under PAHO's employ. Additionally, while you may vote and belong to political parties, you must exercise discretion at all times in your personal political activities and may not participate in fundraising or other campaign activities on behalf of other persons.

➔ **Employment and Activities Outside of PAHO**

Your primary obligation as an international civil service is to devote your energies to the work of the Organization. You may engage in employment or activities outside of PAHO which do not pose a conflict with your official duties or responsibilities, and which are compatible with the work and reputation of the Organization.

If you wish to engage in any paid or unpaid employment or activity outside of the Organization, you must submit a written request to HRM for approval prior to commencing that employment. HRM, after consultation with your supervisors, may require that the outside employment or activity be curtailed, modified or terminated if it is determined that a real or apparent conflict of interest exists.

➔ **Participation in Professional Associations**

You may not receive compensation from any source other than PAHO for work (including teaching, speaking or writing) that relates to your official duties. Work relates to your official duties if:

- The activity is undertaken as part of your assigned work objectives or responsibilities; or
- The circumstances indicate that the invitation to engage in the activity was extended to you primarily because of your official position rather than your expertise in the particular subject matter.

If you are engaged in teaching, speaking or writing as outside employment or as an outside activity you may not use or permit the use of your official title or position at PAHO to identify yourself in connection with the outside activity or to promote any book, seminar, course, program or similar undertaking, except that you may:

- include or permit the inclusion of your title or position as one of several biographical details to identify you, provided that your title or position is given no more prominence than your other biographical details;
- use, or permit the use of, your title or position in connection with an article published in a scientific or professional journal, provided that the title or position is accompanied by a reasonably prominent disclaimer satisfactory to the Organization stating that the views expressed in the article do not necessarily represent the views of PAHO.

➔ **Post PAHO Employment**

There are no restrictions on the types of employment you may obtain after leaving the Organization. However, as soon as you know that you will be leaving PAHO, you must disclose in writing to your supervisor and the Area of Human Resources Management

any real or apparent conflicts existing between your new job and your most recent posting within PAHO.

Note that certain restrictions will apply if you wish to return to work at PAHO after obtaining a termination indemnity or a separation by mutual agreement.

You may use skills, knowledge and experience gained at PAHO in your new employment. However, you may not disclose, publish or communicate confidential PAHO information, without PAHO's authority.

We expect former PAHO employees and retirees to refrain from taking undue advantage from their former relationships with PAHO and its staff.

C. USE OF PAHO'S PROPERTY AND RESOURCES

➔ Overview

You must be extremely careful and vigilant in the use of the Organization's property and resources, including its time, money, credit cards, goods, services, vehicles, office equipment, official records (including electronic records), telecommunications and information technology applications. You must never use the Organization's resources for private gain.

You should only use the Organization's property for official purposes. You have a duty to protect and conserve PAHO property and use it only for authorized purposes.

Under no circumstances should you conduct private business of any kind (including lending or borrowing money, or pyramid schemes) on PAHO property, premises and facilities.

➔ PAHO Name and Logo

PAHO's name and logo are internationally registered and protected. Anyone outside of PAHO wishing to use PAHO's name or logo must submit a written request to PAHO's legal office with a full justification and, for a publication, to PAHO's Office of Publications as well. Typically, PAHO permits the use its name and logo whenever:

- Legal relationships exist between requesting organizations and PAHO, or whenever such requests relate to activities having received financial or other support from PAHO; and
- It can be shown that allowing such use will further the aims of PAHO.

Otherwise, PAHO generally refuses permission to use its name and logo whenever it might be misconstrued, especially where this might imply PAHO's support or endorsement of commercial interests.

➔ **Intellectual Property**

All rights, including title, copyright and patent rights, in any work or invention you produce or develop as part of your official duties belong to the Organization. While authors shall be given credit for publications of a technical character, the Organization has the right to decide where and how to offer for publication any professional or technical paper produced in the course of your duties. In carrying out your daily responsibilities, you must strive to protect PAHO's intellectual property by ensuring that you understand and comply with PAHO's policies on the use, disclosure, release, reproduction, translation, distribution or licensing of PAHO's intellectual property and that you report any unauthorized release or use to the Legal Office. You will find PAHO's policies on this matter at: https://intranet.who.int/sd/cgi-bin/om_isapi.dll?&infobase=Manual&softpage=Browse_Frame_pg

PAHO information is valuable property, intended for official use only. In performing your official duties in PAHO, you may come across or be given official access to confidential or privileged information regarding the Organization, its staff, its partners, its suppliers or others. Unauthorized disclosure of confidential or privileged information may seriously impact the efficiency and credibility of the Organization. Consequently, you must ensure that you do not intentionally or accidentally share confidential or privileged information with unauthorized parties or use such information for your personal benefit, the benefit of someone closely related to you by blood or marriage, or the benefit of someone with whom you have a close personal relationship.

In addition, you must respect the intellectual property rights of other entities. PAHO will not tolerate the unauthorized use, disclosure, release, reproduction, translation, or distribution of such information. You may only use the intellectual property of other entities upon having first obtained their consent or when such is publicly available without restriction.

➔ **Internal Controls**

It is crucial that PAHO maintain accurate record keeping and internal control systems. As such, you must record all transactions and prepare accurate and complete records, in accordance with established procedures. It is inappropriate, for example, to inaccurately record time for reporting purposes, provide false or intentionally misleading information to the Organization, submit false or misleading invoices or vouchers, or falsify any official PAHO documents.

➔ **Use of Official Time**

The official workweek of the Organization for full time work is 40 hours. Unless authorized to use working hours for other purposes or unless you are on officially recognized leave, you must use this official time in an honest effort to perform your assigned duties. No other activity or responsibility may conflict with this obligation

unless specifically approved in writing by your supervisor with a copy of that approval being sent to HRM.

You may not request, promote, direct or attempt to coerce or influence other persons to use official time to perform activities other than those required in the performance of their official duties.

➔ **Use of Office Technology**

PAHO telephones, computers, email, internet, and other technologies may only be used for legitimate business purposes. PAHO reserves the right to monitor and review all information contained in these systems and verify how such systems are being used. Although these systems are provided to help you meet official responsibilities, you may within reason use PAHO telephones or other resources such as e-mail, Internet, voice mail, faxes and computers for limited personal use. You may not make personal long-distance telephone calls or incur any other charges related to your use of Organization assets for personal reasons, if such charges ultimately accrue to PAHO. If there is a personal emergency or some other well-justified reason to use the Organization's long-distance service for personal calls, you must first inform your supervisor and promptly reimburse the Organization for the costs of such calls. You may view your monthly long-distance charges at: <https://intranet.paho.org/AGS/TelDirFr.asp>.

Computers are provided to persons working in the Organization in order to do their work. While email may encourage informality, these messages are official records and may be retrieved and used by the Organization whenever necessary. You must ensure that emails are accurate and their language and tone appropriate. Furthermore, you are prohibited from using PAHO's information technology resources to access, send, or forward material that is harassing, obscene, sexually oriented, or defamatory.

➔ **Motor Vehicles**

The Organization's vehicles are available for official use only. In exceptional cases where a person has been authorized to use a vehicle belonging to the Organization for private purposes, an appropriate reimbursement shall be made according to established mileage rates.

➔ **Frequent Flyer Points**

Persons working for the Organization may join a frequent flyer scheme and retain for personal use the points that they have accrued while traveling on official business.

NOTES

NOTES

Appendix 1 Acknowledgement of Receipt Form

STATEMENT OF ACKNOWLEDGMENT AND AGREEMENT

I have read and understood, and I will comply with PAHO's *Code of Ethical Principles and Conduct*, the *International Civil Service Commission Standards of Conduct for the International Civil Service*, and Article I and Staff Rule 110 of PAHO's Staff Rules and Staff Regulations. I understand that any failure on my part to comply with these requirements will result in disciplinary action being taken against me under Staff Rule 1110, regardless of whether I choose to sign this acknowledgment statement or not.

Signature: _____

Print or type name: _____

Area and Unit: _____

Date: _____