

World Hepatitis Alliance

Title of Policy: Code of Ethics and Business Conduct	
Policy Area: Governance	Number: WHA106
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Policy description

The World Hepatitis Alliance's Code of Ethics and Business Conduct requires employees and other representatives of our organisation to conduct activities honestly, with integrity and good judgement, in compliance with all applicable laws and regulations, and in the best interest of the people living with viral hepatitis. The Code also contains specific requirements addressing:

- Financial transactions
- Ethical fundraising
- Conflicts of interest
- Gifts and gratuities

Who is affected by this policy?

Everyone working for, or representing, the World Hepatitis Alliance

Who should read this policy?

All employees, volunteers, interns, consultants, Board Members and other representatives

Exception to policy

None

Related documents

All governance and management related policies are relevant in this case.

Statement of policy

All employees, volunteers, interns, consultants, Board Members and other representatives of the World Hepatitis Alliance will acquaint themselves with the legal and ethical standards of conduct and restrictions applicable to their duties and responsibilities and will conduct themselves accordingly. They are expected to observe the additional standards of personal and business ethics and conduct specified in this policy (and policy WHA012 for Board Members) and to conduct themselves in a manner that will promote and enhance the reputation of the World Hepatitis Alliance and not be an embarrassment or cause damage.

1. Introduction

The World Hepatitis Alliance's work is inspired by the vision of a world in which viral hepatitis has been eliminated. Our core values – Making a difference, Ambition, Integrity and Trust – describe in broad terms our approach toward our work and the high standards to which we hold ourselves. We commonly identify ourselves as the world's leading independent organisation representing all of the 400 million people living with viral hepatitis globally.

When we act in a way that is consistent with our identity and standards, we build trust and strengthen our ability to deliver our mission for people living with viral hepatitis successfully. When we fail to act according to our identity and standards, we risk the failure of our mission and damage to our reputation.

Building on our vision, identity and values, the World Hepatitis Alliance's Code of Ethics and Business Conduct represents our commitment to work with integrity, honesty and good judgment and in the best interests of the people living with viral hepatitis. It requires that our conduct upholds the organisation's reputation, is respectful of the rights of others, and complies with all applicable laws, regulations and standards.

Each section below starts with a "statement of practice" that states what the policy is, followed by additional information to help you understand how to apply the policy in practice. Our Code will not address every situation you may come across, but in the sections below you will find guidelines meant to help you make decisions consistent with the World Hepatitis Alliance's vision, identity, and values. If you have questions about the World Hepatitis Alliance's Code of Ethics and Business Conduct or would like guidance about a specific matter, contact the Executive Board or Senior Management team as appropriate.

2. Compliance with Law, Regulations and Standards

Statement of Practice: Employees and representatives of the World Hepatitis Alliance will at all times comply with all prevailing and applicable laws, regulations and standards, in keeping with the highest legal and ethical principles.

As an employee or representative of the World Hepatitis Alliance, you must be familiar and comply with:

- The laws and regulations of Switzerland and the countries in which the organisation works;
- The World Hepatitis Alliance's own policies and procedures; and
- Professional standards common to other charitable and non-governmental organisations.

3. Financial transactions

Statement of Practice: All financial transactions, records and reports will comply with donor requirements and applicable financial and accounting standards.

The World Hepatitis Alliance has put in place a range of procedures and controls to ensure that all financial transactions comply with organisational and legal requirements and applicable financial and accounting standards. The following are some examples:

- All financial transactions are recorded accurately and properly. No undisclosed or unrecorded funds or assets are to be established or maintained for any purpose.
- All payments go through a process of authorisation prior to being made.
- Only headquarters-approved bank accounts are used for payments and cash transactions.
- No loans may be taken on behalf of the World Hepatitis Alliance without the written approval of the Executive Board.
- All financial data submitted to donors are accurate, complete and current and meet the requirements of the grant agreement.
- No personal loans or personal advances may be made to staff or consultants under any circumstances without the prior written approval of the CEO for amounts up to £1,000 and the Executive Board for amounts exceeding £1,000.
- All staff expenses must be authorised by the Chief Operating Officer prior to being incurred.
- Travel advances are accounted for and documented immediately upon return.
- A financial audit is conducted annually by an independent auditor.

4. Ethical fundraising

Statement of Practice: The World Hepatitis Alliance upholds the right of people living with viral hepatitis to have access to independent, accurate, comprehensive and balanced information aimed at improving their knowledge of the virus, the health benefits of all available treatments and other methods of improving and maintaining their health. All fundraising activities must therefore be carried out in an ethical manner and ensure the independence of the World Hepatitis Alliance in doing so.

The World Hepatitis Alliance will adhere to the following standards:

- Fundraising activities carried out by the World Hepatitis Alliance will comply with all relevant laws.
- Any communications to the public made in the course of carrying out a fundraising activity shall be truthful and non-deceptive.
- All funds raised via fundraising activities will be for the stated purpose of the request and will comply with the organisation's stated mission and purpose.
- All personal information collected by the World Hepatitis Alliance is confidential and is not for sale or to be given away or disclosed to any third party without consent.
- Nobody directly or indirectly employed by or volunteering for the World Hepatitis Alliance shall accept commissions, bonuses or payments for fundraising activities on behalf of the organisation. This includes members of the Executive Board.
- No general solicitations shall be undertaken by telephone or door-to-door.
- Fundraising activities should not be undertaken if they may be detrimental to the good name or community standing of the World Hepatitis Alliance.
- Financial contributions will only be accepted from companies, organisations and individuals the Executive Board considers ethical. Companies and organisations specifically excluded from making financial contributions to the World Hepatitis Alliance include alcohol, tobacco and weapons companies.
- When accepting financial contributions from pharmaceutical companies with a vested interest in the field of viral hepatitis, the World Hepatitis Alliance absolutely retains the right to make statements and develop policies which may not be in the interests of the industry sponsor or donor and no industry sponsorship or donation will be tied to or conditional upon taking part in promotional activities for a particular product. The World Hepatitis Alliance will only accept contributions that further its pre-existing strategic plan. This strategic plan is developed by the Executive Board, all of whom are patients and unpaid, receiving no

personal benefit from such contributions, assisted by independent non-executive board members or observers from WHO, US CDC, Centre for Disease Analysis and hepatitis Australia.

- The identity of all companies sponsoring the World Hepatitis Alliance is publicly displayed on the sponsors' page of the website.

5. Conflicts of interest

Definition: A conflict of interest is any circumstance that would cast doubt on an employee's or representative's ability to act with total objectivity with regard to the World Hepatitis Alliance's interest.

Statement of Practice: All conflicts of interest involving employees of the World Hepatitis Alliance (or the families of employees) must be disclosed in writing to Senior Management, and the employee must not take part in decisions related to the transaction. All Board Members are required to start each board meeting with a request of those present to declare all actual or potential conflict of interests.

What is a conflict of interest? Simply put, a conflict of interest occurs when your obligations to the World Hepatitis Alliance can be influenced or compromised by competing personal or financial interests, commitments or loyalties. The World Hepatitis Alliance seeks to avoid both the appearance of and any actual conflict of interest.

The following are some examples of conflicts of interest:

- When a representative or family member has a connection to, or significant financial interest in, another party which does or seeks to do business with the World Hepatitis Alliance.
- When an employee engages in an independent business venture or works for another organisation in a way that prevents the employee from devoting the time and effort to the World Hepatitis Alliance required by his or her position.
- When an employee diverts a business opportunity of the World Hepatitis Alliance to another person or organisation.
- When an employee participates in an employment-related decision regarding a family member or other person with whom the employee has a close personal relationship.
- When a Board Member offers professional services to the World Hepatitis Alliance and is rewarded.
- When any information, received through involvement on the Board is used by Board Members, their organisations or networks for personal, professional or strategic advantage.

Resolving Conflicts of Interest: Conflicts of interest arise in many contexts and do not necessarily mean the transaction cannot go forward. As an employee, you must report any conflict of interest promptly and in writing to Senior Management and you must not take part in decisions related to the transaction (If you are in doubt about a potential conflict, speak with Senior Management).

When a Board Member declares a conflict of interest, the Board shall then determine whether or not a declared conflict of interest is of material significance and decide if the individual Board Member shall vote on any matter relating to an identified conflict of interest. Such occurrences are recorded in the minutes.

6. Gifts and gratuities

Statement of Practice: All gifts and gratuities, whether given or received, will comply with applicable laws, rules, regulations, organisation policies, and local standards and customs and will not result in obligating either party. All gifts and gratuities should be reported.

In Switzerland and elsewhere, giving and receiving gifts is bound by a variety of rules, standards and customs, as well as good sense. In some cases, it may be acceptable to give or accept small gifts, donations, payments or favours, but be sure you understand all requirements and customs that may apply and have thought the matter through carefully.

The following gifts or payments are not acceptable under any circumstances:

- Political contributions made from the World Hepatitis Alliance funds.
- Payments to anyone, including corporation representatives, government officials, candidates for a political office, any political party or party official, or others whom you believe might pass that payment onward to any of these prohibited parties in order to obtain or retain business.
- Gifts, entertainment, favours, or reimbursement of expenses for employees (or the families of employees) of the World Hepatitis Alliance by a supplier of the World Hepatitis Alliance.

The following gifts or payments may be acceptable:

- Giving or receiving token gifts, entertainment, or meals in line with local customs and laws, that amount to less than CHF50 in value (or the equivalent in local currency), and do not obligate either party.
- Travel and participation in a business-related, group activity hosted by a supplier or member of the World Hepatitis Alliance, with the approval of Senior Management.

7. Reporting a possible violation

Statement of Practice: Employees and other representatives of the World Hepatitis Alliance have a duty to report promptly any possible violations of the Code of Ethics and Business Conduct or other World Hepatitis Alliance policy to Senior Management or to other Board Members as appropriate.

When misconduct occurs, it affects the World Hepatitis Alliance's ability to achieve its mission for the people living with viral hepatitis. As an employee or representative of our organisation, you are required to report any concerns you have about possible violations of our Code of Ethics and Business Conduct or any other organisation policy. When you communicate a concern, you help the organisation prevent misconduct and contribute to an ethical culture at the World Hepatitis Alliance.

Instructions for making a report are outlined in the World Hepatitis Alliance's policy "Grievance" which is contained in our HR policies handbook.

The World Hepatitis Alliance practices a zero-tolerance approach in connection with any form of retaliation against or harassment of an employee or representative who has reported a concern in good faith. Retaliation and harassment will result in discipline against the harasser, up to and including discharge from employment for employees in accordance with the World Hepatitis Alliance's policy "Harassment and Bullying" which is contained in our HR policies handbook.