

Consistent with our mission to increase access to learning, transfer skills and technology, and support institutional development, the Academy for Educational Development (AED) has established a standard of the highest professional ability, personal integrity, and cultural sensitivity for all our staff and consultants. The AED Code of Ethics outlines the ethical and legal principles which should guide staff regarding decisions and judgments that they are constantly being asked to make. Summarized below, these standards are more completely outlined in AED's policy manual in *Chapter 11, Code of Ethics*, which are given to all staff during their initial orientation as well as being available to all staff on our intranet.

**1. Conflict of Interest:** All AED employees should maintain fairness, ethics, and personal integrity in all matters. AED staff must refrain from participating, or giving the appearance of participating, in any activity that compromises their ability to render fair, impartial judgments on behalf of AED's clients as well as in the development of new business opportunities. In addition, as a nonprofit organization in the United States, AED staff and consultants are also duty bound by U.S. government regulations concerning individual and organizational conflicts of interest. All AED staff should be aware of how to handle Organizational Conflicts of Interest (OCI) in a straight-forward, transparent way. OCI rules are designed to keep companies from exercising unfair advantage through their privileged knowledge or access to information. As rules vary by country and donor, staff should carefully read AED's *Code of Ethics* for additional guidance.

**2. Hiring and Procurement:** The Academy follows the guidance of U.S. government and other donor agencies regarding the employment of their former staff. Most agencies have specific regulations regarding the terms under which such staff can be hired and how long they must reclude themselves from representing AED back to that agency. AED staff considering hiring client agency staff should consult with the regulations specific to that agency, and discuss such decisions in advance with either the President or Chief Operating Officer, prior to moving forward with an offer of employment. This is especially sensitive for those individuals who serve as the donor agency's principal point of contact, or who are otherwise directly involved with supervising a particular grant, contract, or subcontract with the AED. In addition, staff should be sensitive to other conflicts of interest:

- a) **Donor Agency Spouses and Partners:** AED forbids the hiring of the spouses, partners or other immediate family members of those individuals who serve as the donor agency's principal point of contact, or who are otherwise directly involved in the awarding, supervision or close out of a grant, contract, or subcontract to AED. With the prior approval of Human Resources, AED may hire the spouses, partners or other immediate family members of donor agency personnel who have no direct contact or supervisory responsibility for awards with or to AED.
- b) **AED Staff Spouses and Partners:** Many spouses, partners and immediate family members of AED staff have professional expertise appropriate to our work. AED may consider and hire spouses, partners and immediate family members of AED staff for appropriate short- and long-term assignments or use them as vendors to provide specific goods or services. However, current AED staff cannot be employed in the same work unit as their spouse, partner, or immediate family member; they cannot be involved in their recruitment, selection, supervision, or evaluation; nor can they authorize payment for their services. Any such relationship must be brought to the attention of Human Resources before the person is hired.

- c) **Spouses and Partners Working for Donor Agencies:** Occasionally the spouses, partners and/or immediate family members of AED staff work for donor agencies providing assistance to the Academy. All AED staff should be sensitive to the potential conflict of interest such a situation could represent. No staff person in such a situation is expected to provide, nor should be asked to provide, any information from his or her relative regarding current AED grants and contracts or potential business opportunities with that donor agency. Any Academy staff persons who are inadvertently put into a potential conflict of interest should immediately report this to their supervisor and excuse themselves from any further involvement pending resolution of the issue.
- d) **Contracting, Subcontracting, and Procurement:** AED believes that our interest and those of our clients are best served by fair and open competition in contracting, subcontracting, and procurement. Employees should consult applicable donor guidelines on soliciting competitive bids when procuring goods and services as well as with AED's Vice President for Contracts/Grants Management for interpretation of these guidelines.

**3. Representation:** AED staff should ensure that development of new business is not undertaken at the expense of existing program activities. But AED recognizes that identifying development opportunities naturally occurs during the course of normal, day-to-day project activities without the intentional investment of additional time by staff. Opportunities requiring more intensive commitment of time should be discussed, in advance, with the appropriate Group and Center Director to determine the most appropriate manner in which to undertake and finance the investment of staff time and associated miscellaneous expenses required to pursue the opportunity. AED should keep the following principles in mind:

- a) **Inducements.** In accordance with U.S. federal regulations and accepted good business practices, no Academy employee is authorized to offer, or give the impression of offering, an inducement (monetary or otherwise) to any current or potential client or donor agency official for the purpose of obtaining proprietary information or influencing their judgments on future grant or contract awards. AED staff should immediately report any evidence of such activities to the Chief Operating Officer (COO) or to the President.
- b) **Fees and Commissions.** Similarly, Academy employees are prohibited from paying, or offering to pay, any fees or commissions to consultants or other AED staff to obtain proprietary information or to otherwise assist in any inappropriate manner in obtaining a contract or grant award. AED staff should immediately report any evidence of such activities to the COO or to the President.
- c) **Entertainment.** As a not-for-profit non-governmental organization, AED keeps entertainment costs at a very modest level. Moreover, unlike commercial firms, AED does not reimburse elaborate entertainment costs such as games fees (for example, golf and tennis), nightclub cover charges, excess gratuities, or more than nominal gifts for visitors. Staff is required to consult with their Center or Group Director for guidance about the appropriateness of a particular activity, before—not after—making the expenditure.
- d) **Gifts.** Except for gifts of nominal cost—less than \$50 in fair market value—or meals and social invitations that are in keeping with good business ethics and do not obligate the recipient or the employee, AED staff or a member of his or her immediate family may not

accept, give, or offer commissions, gifts, payments, services, loans, or promises of future employment to anyone in connection with his or her assignment.

- e) **Lobbying and Advocacy:** As citizens, employees are free to and are encouraged to fully meet their individual civic and political responsibilities, except, however, for participation in any activities that constitute (or could be construed as) lobbying any government official to amend and/or add new regulations or laws specifically favoring AED.

In the U.S., only personnel authorized by AED to conduct lobbying activities within the IRS guidelines for 501(c)(3) organizations shall participate in any such activities. All time and costs shall be strictly accounted for and properly segregated. This policy does not prevent AED employees from engaging in policy and technical discussions with policy makers and providing the benefit of their knowledge and experience. But they must avoid advocacy for policy or program changes that would specifically benefit AED.

In other countries, AED staff should appreciate the delicate line between involvement in national politics and advocating the development of national policies: a strong public stand on "technical issues" may be perceived as a political rather than a technical statement. Although establishing universal guidelines are difficult, AED believes that our central purpose is to provide advice and counsel, not to make national policy or to become involved in controversial public debate.

**4. Outside Interests and Employment:** Regular executive staff and officers have a full-time responsibility to AED and may not engage in activities that might interfere with the discharging of their responsibility or in transactions that reasonably might affect the judgments they make on behalf of the Academy. In addition, the following general guidelines apply:

- a) **Speaking Engagements and Articles for Publication:** Staff members are encouraged to undertake speaking engagements and to write articles appropriate to their fields of interest, provided the time for preparation and delivery does not interfere with their responsibilities to the Academy. Staff may keep any honoraria they are awarded for such work outside of working hours.
- b) **Serving on Advisory Boards of Directors:** AED employees are encouraged to become professionally involved with other institutions through their participation in advisory boards, boards of directors, and other activities. Staff members should consult with the COO and President, however, before committing to undertake such activities to ensure that they do not conflict with other projects and interests of the Academy.
- c) **Fees and Other Payments:** Non-AED related director's fees, honoraria for speeches, fees for jury duty, radio and TV appearances, author's royalties and payments for published articles or article reviews, and travel reimbursements may be accepted, provided these payments do not represent activities that interfere with the staff member's responsibilities to the Academy. No salary or consulting fee, however, may be accepted by regular staff members of the Academy for services rendered to other organizations or persons during regular business hours, vacations, or sabbaticals except on behalf of AED.
- d) **Teaching Stipends:** AED staff is encouraged to remain current in their respective technical fields through such activities as teaching courses. Staff may keep honoraria

and modest fees for teaching such courses outside of working hours, as long as these activities do not interfere with the staff member's responsibilities to the Academy. AED staff should seek the guidance of their Center and Group Director prior to committing to the teaching assignment to clarify any potential concerns about the assignment.

**5. Plagiarism and Research Misconduct:** Misconduct in research means any practices that deviate from those commonly accepted by the academic and scientific communities in pursuing and publishing research and reporting on program activities. These practices include falsifying or fabricating data or results, plagiarism, and any similar practices. It does not include honest errors or differences in interpreting data or research results. In producing, creating, or writing AED documents, staff may not use or incorporate content from other documents without crediting the source and/or obtaining permission, as appropriate. AED expects all employees to adhere to the highest standards of conduct in these areas as they carry out research, report on research and project activities, and develop training and other program materials, guidelines and products. The Executive Vice President (EVP) serves as our responsible corporate officer for ensuring the integrity of our research activities. In that role, the EVP is in charge of investigating any allegations of research misconduct, considering procedures for AED to establish to facilitate research reviews, and in guiding any institutional actions in response. Any alleged or suspected misconduct in research should be reported directly to the Center Director and the EVP, along with supporting documentation.

**6. Disclosure of Information:** AED staff should exercise the utmost discretion in regard to all matters of official business. They may not communicate any information known to them by reason of their position that has not been made public, except as may be necessary in the course of their duties or by authorization of the President. Nor shall they at any time use such information to their private advantage. These obligations do not cease upon separation from the Academy. No employee shall disclose information about Academy proposals or bids to anyone outside AED without the permission of the Officer-in-Charge, Program Group Director, the COO, or the President.

For further clarifications on any aspect of our *Code of Ethics*, staff should consult their AED Group Director and/or Center Director, and subsequently, as required, the appropriate person listed below:

- Administrative and Contractual Matters: Chief Management Officer or Chief Financial Officer;
- Academy's General Policies and Procedures: Chief Operating Officer or President.

*Attested:*

I have read the statement above, and I have read AED's full Code of Ethics. I will conduct my work as an AED employee in line with these principles and commit to monitor that AED staff under my supervision do so as well.

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**Signature**

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**Date**

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**Printed Name**

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