

IJM CODE OF ETHICS

International Justice Mission

Version: 1.0

Original Effective Date: July 2024

Last Update: Published February 2024 (Update Effective July 2024)

Date of Next Review/Frequency: July 2026, every 2 years

Author: Vice President of SF & Vice President of Enterprise Governance

Owner: Chief Administrative Officer

Scope/Eligibility: Employees, Interns & Fellows, Contingent Workers



Contents

Introduction	3
Safeguarding	4-6
Stewardship &	
Respect	7-9
Confidentiality & Data Integrity	10-11
Reporting	12-13
Programmatic Excellence	15-16

Our Mission

IJM's mission is to protect people in poverty from violence by rescuing victims, bringing criminals to justice, restoring survivors to safety and strength, and helping local law enforcement build a safe future that lasts.

Our Vision

IJM's vision is to rescue millions, protect half a billion and make justice for the poor unstoppable.

Introduction

Scope

The International Justice Mission's (IJM) Code of Ethics (Code) applies to all IJM Employees, Interns, Fellows and Contingent Workers, henceforth referred to as "we" or "our" or "us".

PURPOSE

IJM's Code outlines the expectations for professional behavior of all parties to ensure we operate with relational, operational, financial, and programmatic integrity. It reflects our organizational commitment to adhering to the highest standards of personal integrity, moral conduct, ethics, compliance, and accountability.

This Code outlines our foundational *guiding principles*, setting expectations for all of us. It also highlights our *shared commitments* in working together to fulfill the mission and vision of IJM, which includes active recognition and adherence to our governing documents.

APPROACH

IJM's mission is to protect people in poverty from violence. Our ultimate aspirational standard is other-focused, sacrificial, and service-oriented love and we seek to be guided by the highest of all ethical standards: *love*. In the midst of our mission to do great good in the world, we share a deep and ongoing commitment to *do no harm*. This commitment applies to our interactions

with colleagues, partners, suppliers and the individuals and communities we seek to serve. It governs our behavior in relational, operational, financial, and programmatic aspects of our work.

In cases where this Code establishes a more stringent standard than local laws, we are obligated to adhere to this Code.

CONTEXT & AUTHORITY

This Code is derived from the *IJM Board Policy Manual* and is designed to align with international standards, laws, and regulations. Its application extends continuously, 24/7, throughout the year, irrespective of one's location within or outside their home country or place of work.

COMPLIANCE

The intention of the Code is to safeguard the people, operations, and mission of IJM. IJM is accountable for this by taking seriously compliance with this Code and all governing documents. Failure to comply with the Code may result in disciplinary action, up to and including termination of employment, contracts, or other agreements. IJM reserves the right to pursue legal and/or equitable remedies in the event that noncompliance results in damages or harm to IJM and IJM Representatives, to legally comply with all government or grantor reporting obligations, and to reasonably cooperate in investigations by government agencies of competent jurisdiction.

SAFEGUARDING

Prioritizing the well-being of all people.

Safeguarding

At IJM, we are committed to safeguarding, protecting, and acting in the best interest of everyone who encounters any of our work. IJM values diversity and seeks to foster a culture of transparency and collaboration in our safeguarding work. This commitment extends to our employees, contingent workers, volunteers, partners, suppliers, as well as survivors and other vulnerable people we seek to serve, including children and vulnerable adults (all people).

IJM is Committed to Zero-Tolerance of Violence, Abuse, Exploitation, Harm and Neglect.

Safeguarding the safety and wellbeing of all people is core to IJM's mission and identity. We are committed to ensuring the safety of all people and treating them with respect, dignity, and equality. We will never engage in or tolerate any form of sexual exploitation, abuse, harassment, discrimination, physical or verbal abuse, or intimidation.

These are the expectations of us:

- We will treat all people with dignity and respect.
- We respect and uphold the rights of every individual.
- We will exercise special care for and prioritize the best interests of children and all vulnerable people.
- We will always obtain informed consent prior to engaging in storytelling and will tell stories in responsible and honoring ways.
- We will not abuse a position of power or authority to gain an advantage.
- We set appropriate boundaries and will never engage in sexual relationships with survivors, beneficiaries, or children (under the age of 18), or engage in any type of sexual relationship in exchange for money, a gift or favor of any kind, or other payment.
- We will never engage in the trafficking of persons of any kind or through any means including but not limited to online sexual exploitation and will remain vigilant to recognize and report any signs of trafficking we see within the workplace or in the communities we work.

APPLICABLE POLICIES AND STANDARDS

- Global Safeguarding Policy
- Global Protection Against Sexual Exploitation, Abuse and Harassment (PSEAH) Policy
- Global Story Gathering and Creation Policy
- Global Story Use Policy

IJM is Committed to a Safe, Fair, Drug-Free and Equitable Workplace.

IJM cares deeply for its employees and those who collaborate and support the organization, creating an experience rooted in our values. We are committed to fostering a work environment where all people are valued for their unique qualities, treated with dignity, decency, respect, and fairness, ensuring a safe space free from harassment, discrimination, bullying,

or inequality. We believe that we must work together to maintain an environment that promotes employee well-being, positive engagement, meaningful purpose, and quality performance.

These are the expectations of us:

- We will adhere to health and safety standards and follow the Global Safety and Security Standards.
- We will not engage in or be under the influence of illegal drug use during official IJM work.
- We will prioritize IJM values throughout the employee lifecycle, work honestly and care for others.

- Global Work Norm Standards
- Global Recruiting, Hiring, Onboarding Policy
- Global Contingent Worker Engagement Policy and Onboarding Policy
- Global Safety and Security Standards

STEWARDSHIP & RESPECT

Using resources with accountability and integrity.

Stewardship & Respect

At IJM, we are faithful stewards in using the organization's resources to further the mission and are accountable to follow through on the obligations we commit to.

IJM is Committed to Financial and Resource Stewardship, Avoiding Conflicts of Interest in All Transactions.

IJM conducts all its operations and transactions according to the highest ethical standards and we shall conduct all its affairs above reproach, with the highest level of integrity, and shall avoid undisclosed conflicts of interest.

These are the expectations of us:

- We are committed to the responsible management of all IJM finances, assets and entrusted resources and will not use IJM resources or status for personal gain but rather for the sake of the mission.
- We conduct thorough due diligence, ensuring ethical and fair practices in all purchases, free from fraud, corruption, and undisclosed conflicts of interests. Our decisions prioritize good judgement, aiming to secure the best value for IJM.
- We have zero tolerance to engaging in fraud or accepting or giving significant gifts that would be considered a bribe.
- We will not have any direct or indirect conflicts of interest in our dealings on behalf of IJM. This includes – but is not limited to – awarding benefits, contracts, employment, or promotion within IJM to individuals with whom we have financial, personal, family, or close relationship interests. Any such conflicts must be disclosed and approved per IJM's Board or IJM Representatives' Conflict of Interest Policies.
- We will not support or engage in any criminal activity, including terrorist activities.

- Global Finance Standards
- Global Anti-Money Laundering and Countering the Financing of Terrorism Policy
- Global Bribery, Fraud, Extortion and Improper Dealings Policy
- Global Conflict of Interest Board
- Global Conflict of Interest Policy IJM Representatives
- Global Procurement Standards
- Global Due Diligence Policy

IJM is Committed to Pursuing Funding with Integrity on Behalf of IJM.

IJM values and honors the partnership of donors to fund the mission of protecting vulnerable communities from violence.

These are the expectations of us:

- We will ensure compliance with donor intent, including properly administering funds and fiduciary responsibilities.
- We will speak up to ensure the prevention of fraud, abuse, or money laundering.

APPLICABLE POLICIES AND STANDARDS

- Global Funding Designation Standards
- Global Gift Policy
- Global Revenue Opportunity Review Policy
- Global Grant Standards
- Global Eligible Costs Policy
- Global Restricted Activities and Grants Policy

IJM is Committed to Honoring IJM Legal and Contractual Relationships.

IJM desires to be a trustworthy partner, engaging exclusively in legal and fair contractual relationships on behalf of IJM and following the global policy requirements and local laws. IJM commits to being observant of and complying with all local laws.

APPLICABLE POLICIES AND STANDARDS

Global Contracts Policy

CONFIDENTIALITY & DATA INTEGRITY

Committing to honest and secure handling of information.

Confidentiality & Data Integrity

At IJM, we take seriously our role in safeguarding and dealing honestly with the information entrusted to us.

IJM Is Committed to Data Privacy, Security and Integrity.

IJM is dedicated to the collective responsibility of safeguarding data, ensuring confidentiality of personal and sensitive information across all platforms, including social media. We commit to protecting privacy in compliance with applicable guidelines, laws and regulations, covering all intellectual property and business data entrusted to IJM.

These are the expectations of us:

- We are committed to the meticulous collection, maintenance, and reporting of accurate and high-quality data for IJM. We ensure the legitimacy of our data practices, possessing the necessary legal basis for the collection, storage, and processing of information.
- We will protect personal and sensitive IJM data and follow local data privacy laws.
- We will only use IJM data and technology for its intended purpose.

- Global Acceptable Use of IJM Computing and Communication Resources Policy
- Global Confidentiality and Safeguarding of Information Policy
- Global Data Safeguarding Policy
- Global Employee Data Policy
- Global Physical Document Retention and Destruction Policy
- Global Social Media Policy

REPORTING

Fostering a culture of truth and honesty.

Reporting

At IJM, we take reporting requirements seriously and commit to providing an environment in which all people feel comfortable and encouraged to report truthfully and honestly. We have a zero-tolerance policy on retaliation or reprisal for anyone speaking up or reporting in good faith.

IJM is Committed to Providing Accurate and Timely Reports.

IJM is dedicated to measuring our impact through the pursuit of accurate metrics, meticulous data recording, and transparent reporting characterized by the highest level of honesty and integrity.

These are the expectations of us:

- We will record the most truthful and honest portrayal of our work to the best of our ability according to the audience and purpose of the reporting.
- We will communicate openly and honestly and will work to meet all reporting requirements to the best of our ability.

IJM is Committed to Providing an Objective and Secure Process to Report Suspected Misconduct.

IJM encourages all people to speak up and report any incidents, illegal practices or violations of IJM policies, and commits to providing confidential ways to do so. IJM will also in return report to donors and other bodies as required by all donors and legal obligations.

These are the expectations of us:

- We will promptly speak up and diligently follow the established process to report any instances of illegal, unethical, or dishonest behavior within the organization, entrusting the responsibility for investigation to the organization's designated procedures.
- We will handle sensitive information with utmost care and maintain confidentiality when our job responsibilities require it.
 Respecting the privacy of individuals and the integrity of our organization is paramount.

- Global Complaints Management/Internal Investigations Policy
- Global Whistleblower Policy

PROGRAMMATIC EXCELLENCE

Living our values for exceptional care.

Programmatic Excellence

At IJM, our core values include *professionalism* and *bridge building* so that all people we serve receive the very best care and experience us as humble partners in the work.

IJM is Committed to Managing Programs in an Inclusive, Iterative, and Datadriven Way.

IJM's programmatic work strives to protect people from violence, ensuring equitable access to justice. We cultivate extensive partnerships with survivors and key stakeholders, proactively identify and manage risk, remain responsive to changing environments, and base decisions on quality data.

These are the expectations of us:

- We will develop and manage programs that adhere to the Global Program and Project Management Standards
 and the global safeguarding policies, in accordance with principles of sustainability, gender, diversity and
 inclusion, and in alignment with international standards.
- We will develop and manage our programs with a lens toward caring for the most vulnerable and marginalized people.
- We will be careful to conduct due diligence and select partners to deliver the best care for survivors and the communities we serve.
- We will conduct ethical, high-quality research and protect the safety of research participants through proper procedural oversight, proper collection of personal and sensitive data, and safe handling of data and measurements.

- Global Ethical Research Standards
- Global Programs Standards
- Global Program and Project Management Standards
- Global MERL Standards
- Global Quality Research Policy
- Global Implementing Partnership Standards

46

GUIDED BY INTEGRITY AND FUELED BY COMPASSION, OUR CODE OF ETHICS IS A COMMITMENT TO EXCELLENCE AND JUSTICE IN EVERY ENDEAVOR.

GARY HAUGEN
CEO of International Justice Mission