**CODE OF CONDUCT**

The Syrian Association for Relief and Development (SARD) is committed to upholding the highest standards in all our business dealings. Government and other international and private funders, protecting taxpayer resources, and providing high-quality services and products. Complying with all laws and regulations and ensuring fair competition are fundamental to this commitment.

This Code of Conduct holds the values and rules that SARD and its staff shall act by to uphold and safe-guard the necessary standards of conduct and to avoid misconduct.

This Vendor (“vendors”) Code of Conduct contains principles to promote ethical conduct in the workplace, safe working conditions, the protection of sensitive information, and the treatment of workers with respect and dignity. As used in this Vendor Code, “Vendor” refers to any entity providing products, people or services to The Syrian Association for Relief and Development , including its subcontractors and agents, and where applicable, the personnel of Vendor and its subcontractors and agents. At a minimum, all Vendors must operate in full compliance with the laws, rules and regulations of the jurisdictions (whether U.S. or otherwise) in which they operate or where they provide services to The Syrian Association for Relief and Development . Where this Vendor Code sets higher standards than what the law provides, The Syrian Association for Relief and Development expects Vendors to adhere to such standards. This Vendor Code is not intended to create new or additional rights, or any additional The Syrian Association for Relief and Development obligations, in favor of Vendors, Vendor personnel, or any third parties. It supplements, but does not supersede, the contracts between The Syrian Association for Relief and Development and the Vendor.

**I. Compliance with Laws**

1. Maintain Accurate Records

Vendors must create accurate records and not change any record entry to conceal or misrepresent the underlying transaction represented by it. All records, regardless of format, made or received as evidence of a business transaction must fully and accurately represent the transaction or event being documented.

**II. Human Rights**

The Syrian Association for Relief and Development expects our vendors to treat people with respect and dignity, encourage diversity, remain receptive to diverse opinions, promote equal opportunity for all, and foster an inclusive and ethical culture.

1. Child Labor

The Syrian Association for Relief and Development expects our vendors to ensure that illegal child labor is not used in the performance of work. The term “child” refers to any person under the minimum legal age for employment where the work is performed.

1. Human Trafficking

Vendors must adhere to regulations prohibiting human trafficking and comply with all applicable local laws in the country or countries in which they operate. Vendors must refrain from violating the rights of others and address any adverse human rights impacts of their operations. Vendors must educate employees on prohibited trafficking activities, discipline employees found to have violated the law or rules, and notify The Syrian Association for Relief and Development and action taken against employees. Specifically, vendors will be prohibited from the following in all contracts:

• Destroying, concealing, or confiscating identity or immigration documents;

• Using misleading or fraudulent tactics in recruiting;

• Charging employee recruitment fees or providing inadequate housing based on local standards, laws, and directives;

• Failing to provide employment contracts and other documentation in the employee’s native language;

• Failing to provide return transportation upon the end of employment for employees brought to the country for the purpose of working

• Failing to interview and protect employees suspected of being trafficking victims.

**III. Employment Practices**

1. Harassement

The Syrian Association for Relief and Development expects our vendors to ensure their employees are afforded an employment environment that is free from physical, psychological, and verbal harassment or other abusive conduct.

1. Non-Discrimination

The Syrian Association for Relief and Development expects our vendors to provide equal employment opportunity to its employees and applicants for employment, without regard to race, ethnicity, religion, color, sex, national origin, age, military veteran status, ancestry, sexual orientation, gender identity or expression, marital status, family structure, genetic information, or mental or physical disability, so long as the essential functions of the job can be competently performed with or without reasonable accommodation.

1. Substance Abuse

The Syrian Association for Relief and Development expects our vendors to maintain a workplace free from illegal use, possession, sale, or distribution of controlled substances.

**IV. Anti-Corruption**

1. Anti-Corruption Laws

Our vendors must comply with the anti-corruption laws, directives, and/or regulations that govern operations in the countries in which they do business

We require our vendors to refrain from offering or making any improper payments of money or anything of value to government officials, political parties, candidates for public office, or other persons. This includes a prohibition on facilitating payments intended to expedite or secure performance of a routine governmental action like obtaining a visa or customs clearance, even in locations where such activity may not violate local law. Personal safety payments are permitted

where there is an imminent threat to health or safety. We expect our vendors to exert due diligence to prevent and detect corruption in all business arrangements, including partnerships, joint ventures, offset agreements, and the hiring of consultants.

1. Illegal Payments

Our vendors must not offer any illegal payments to, or receive any illegal payments from, any customer, vendor, their agents, representatives, or others. The receipt, payment, and/or promise of monies or anything of value, directly or indirectly, intended to exert undue influence or improper advantage is prohibited. This prohibition applies even in locations where such activity may not violate local law.

1. Unfair Business Practices

Vendors must not engage in unfair business practices such as fixing prices or rigging bids with competitors. Vendors must not allocate customers or markets with competitors, or exchange current, recent, or future pricing information with competitors. Vendor will otherwise comply with all applicable antitrust and competition laws.

1. Gifts/Business Courtesies

The Syrian Association for Relief and Development expects our vendors to compete on the merits of their products and services. The exchange of business courtesies may not be used to gain an unfair competitive advantage.

**V. Information Protection**

1- Confidential/Proprietary Information
We expect our vendors to properly handle sensitive information, including confidential, proprietary, and personal information. Information should not be used for any purpose (e.g., advertisement, publicity, and the like)

1. Intellectual Property

The Syrian Association for Relief and Development expects our vendors to respect and comply with all the laws governing intellectual property rights assertions, including protection against disclosure, patents, copyrights, and trademarks.

1. Information Security

Vendors must protect the confidential and proprietary information of others, including personal information, from unauthorized access, destruction, use, modification, and disclosure through appropriate physical and electronic security procedures. Vendors must comply with all applicable data privacy laws. Vendors shall ensure extension of this requirement to all sub-tier sources they employ.

**VI. Environment, Health, and Safety**

The Syrian Association for Relief and Development expects our vendors to operate in a manner that actively manages risk, conserves natural resources, and protects the environment. We expect our vendors to comply with all applicable environmental, health and safety laws, regulations, and directives. Vendors should protect the health, safety, and welfare of their people, visitors, and others who may be affected by their activities.

**VII. Global Trade Compliance**

1. Information Security

When applicable, vendors are encouraged to implement practices and procedures to ensure the security of their supply chains in accordance with the Customs-Trade Partnership Against Terrorism.

**VIII. Quality**

Vendors must take due care to ensure their work product meets our company’s quality standards. We expect our vendors to have in place quality assurance processes to identify defects and implement corrective actions and to facilitate the delivery of a product whose quality meets or exceeds the contract requirements.

1. Information Security

We expect our vendors to develop, implement, and maintain methods and processes appropriate to their products to minimize the risk of introducing counterfeit parts and materials into deliverable products. Effective processes should be in place to detect counterfeit parts and materials, provide notification to recipients of counterfeit product(s) when warranted, and exclude them from the delivered product.

**X. Ethics Program Expectations**

1. Information Security

The Syrian Association for Relief and Development expects our vendors to provide their employees with avenues for raising legal or ethical issues or concerns without fear of retaliation. We expect our vendors to take action to prevent, detect, and correct any retaliatory actions.

1. Consequences for Violating Code

In the event of a violation of any of the above expectations, we may pursue corrective action to remedy the situation. In the case of a violation of law or regulation, we may be required to report those violations to proper authorities. We reserve the right to terminate our relationship with any vendor under the terms of the existing procurement/purchasing contract.

**Contacts/Resources**

For questions regarding The Syrian Association for Relief and Development Vendor Code of Conduct, please contact The Syrian Association for Relief and Development Compliance Department.

**(SIGNATURE OF VENDOR’S AUTHORIZED REPRESENTATIVE)**

**Name**

**……………………………………………………………………………………**

**Address**

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**Date**

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**Signature**

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