

ACCOUNTABILITY LAB GLOBAL

Document 01: Code of Conduct

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Status	Approved
Owner	Co-CEOs, jointly. A single named owner is still to be confirmed.
Approved by	AL Global Board of Directors, on the recommendation of the Governance Committee
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Adopted by	<i>AL Board of Directors</i>
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Review cycle	Every two years, or sooner if the law or the operating context changes
Next review due	<i>23 September 2028</i>
Part of	The AL Global policy set, Documents 00 to 20. Document 00, the Alignment, Roles and Ownership Register, is the control document for the set.

Amended 24 September 2026. Reinstatement of at-will employment for US-based staff. Staff based outside the United States are employed under the labour law of the country where they work. Only the 24 September changes are highlighted in this file.

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1. Why this exists

Accountability Lab (AL) asks governments, companies and institutions to be honest, open and answerable for what they do. We have no standing to ask that of anyone else unless we hold ourselves to the same test.

This Code is the single statement of how everyone connected to AL is expected to behave. It is short on purpose. Where a subject needs more detail, the Code points to the policy that carries it.

Signing this Code is a condition of working with or at AL Global.

2. Who it applies to

AL Global's structure means this Code has three tiers of application. They are not the same and should not be blurred.

Tier 1: applies directly and in full, with no equivalence test and no opt-out.

- Employees of AL Global, full time, part time, temporary and probationary
- **Employees of Model A fiscally sponsored projects.** AL Global is a fiscal host. Under Model A, comprehensive fiscal sponsorship, the project is legally part of AL and its staff are AL Global employees. They are covered by this Code in exactly the

same way as anyone in the AL Global office, and their client organisation cannot substitute its own policy

- Staff employed under the AL Global EOR service
- Members of the AL Global Board of Directors
- Fellows, interns and volunteers
- Consultants, contractors and their personnel while engaged on AL work
- Secondees and anyone else representing AL

Tier 2: applies by agreement, with an equivalence carve-out.

Model C fiscally sponsored partners, where the partner is a separate legal entity receiving a pre-approved grant from AL. This Code flows down through the grant agreement, unless the partner has its own policy of equal or higher standard. Equivalence is assessed and recorded at onboarding by the responsible AL role named below, and reviewed annually. It is not assumed.

Tier 3: applies by collective adoption, not by AL Global instruction.

Network Labs in the translocal network, currently Nepal, Pakistan, Liberia, Nigeria, Mali, ALESA and Zimbabwe. These are autonomous, separately governed organisations and AL Global is one participating lab among them. Under the Governance Compact, AL Global has no authority to direct them. Network-wide standards are adopted through the Network Council. Each Lab is invited to adopt this Code or one meeting its standards. Where a Lab's own law sets a higher standard, the higher standard applies.

Equivalence assessment is owned as follows. Conduct and safeguarding equivalence is assessed by the Global Safeguarding Lead. Financial policy equivalence is assessed by the Director of Finance. Both are recorded in the client file.

This Code applies during working hours and outside them, wherever conduct could affect the safety of another person or the standing of AL.

3. The eight commitments

3.1 We do not exploit anyone

We work with people who are often vulnerable, marginalised, at risk from their own governments, or dependent on us for income, status or access. That gives us power over them. We do not use it.

No one acting for AL may seek sexual, financial, social or political advantage from a programme participant, community member, fellow, applicant, partner staff member or anyone else who is in a weaker position relative to AL.

Sexual activity with anyone under 18 is prohibited without exception, regardless of local age of consent and regardless of belief about the person's age. Buying sex is prohibited for anyone acting on behalf of AL, at any time, whether or not it is legal where they are.

See: Safeguarding and PSEAH Policy.

3.2 We do not harass, bully or discriminate

Everyone at AL is entitled to work without being demeaned, intimidated, shouted at, sexually pursued or excluded. Harassment is judged by its effect on the person receiving it, not by the intent of the person doing it.

We select, pay, promote and dismiss on the basis of ability and conduct. We do not discriminate on grounds of race, colour, ethnic or national origin, nationality, caste, religion or belief, sex, pregnancy or maternity, sexual orientation, gender identity or expression, marital or family status, age, disability, health status including HIV status, genetic information, or political opinion.

See: Speak Up Policy, Equality, Diversity and Inclusion Policy.

3.3 We do not take or give bribes

No one acting for AL may offer, give, request or accept any payment, gift, favour or advantage intended to influence a decision improperly. This includes facilitation payments, sometimes called speed money, to obtain routine services such as permits, customs clearance or visas.

The only exception is a payment made under genuine and immediate threat to someone's personal safety. Such a payment must be reported to the Co-CEO, Innovation and Operations within 24 hours and recorded.

Gifts and hospitality above nominal value must be declared and may not be accepted if they could reasonably look like an attempt to buy influence.

See: Anti-Fraud, Bribery and Corruption Policy, Conflict of Interest Policy.

3.4 We declare conflicts rather than manage them quietly

If you have a personal, family, financial, political or romantic interest that could affect, or appear to affect, a decision you make for AL, you declare it in writing and step out of the decision.

This includes hiring or supervising a relative or partner, awarding work to a business you or a family member has an interest in, holding political office or candidacy, and taking outside paid work that overlaps with AL's work.

A close personal or romantic relationship between two people where one has any influence over the other's pay, promotion, assessment or continued engagement must be declared. AL will change reporting lines rather than ask anyone to end a relationship or resign.

3.5 We handle money and assets honestly

We spend donor and grant funds only for the purpose agreed. We keep records that are complete and accurate. We do not create false invoices, backdate documents, inflate expenses, or approve our own spending. We do not use AL equipment, funds, name or time for private benefit.

Deliberate falsification of a financial record is gross misconduct.

See: Financial Management Manual, Procurement Policy, Duty of Care, Safety and Security Policy.

3.6 We protect people's information and identities

Much of the information we hold can put someone in danger. Names of whistleblowers, community monitors, citizen reporters, survivors of abuse and staff in hostile environments are protected information.

You share such information only with people who need it to do their job. You do not discuss it in public places, on personal devices without protection, on unencrypted channels, or on social media. You do not photograph or record anyone without their informed consent, and you do not use someone's image or story in a way they did not agree to.

See: Information, Data and Digital Security Policy, Safeguarding, Ai Policy and PSEAH Policy.

3.7 We speak up, and we do not punish people who do

If you see or suspect a breach of this Code, you are required to report it. Not reporting a safeguarding concern is itself a breach.

Retaliation against anyone who reports in good faith, or who takes part in an investigation, is gross misconduct. This holds even if the concern turns out to be mistaken.

AL will not use confidentiality clauses or settlement agreements to prevent anyone from reporting misconduct to a regulator, a donor, the police or a court.

See: Speak Up Policy.

3.8 We stay independent and represent AL accurately

We do not take money or instructions that would compromise our judgement or our partners. We are clear about when we speak for AL and when we speak for ourselves. We do not claim results we cannot evidence.

Personal political activity is your own business, provided it is lawful, done in your own time and name, and does not imply AL endorsement. Where holding office or campaigning would create a conflict, declare it.

4. What is prohibited outright

The following are gross misconduct and will normally lead to dismissal or termination, in addition to referral to authorities where the law requires it:

- Sexual activity or fraternizing (forming an overly close relationship) with a person under 18
- Sexual exploitation or abuse of any programme participant, community member or beneficiary
- Sexual activity with anyone in exchange for money, employment, goods, services, or the promise of any of these
- Sexual assault or physical violence
- Retaliation against someone who has reported a concern
- Fraud, theft, or deliberate falsification of records
- Offering or accepting a bribe
- Deliberately disclosing information that puts someone at risk
- Failing to report a known or suspected safeguarding concern
- Withholding information from, or obstructing, an authorised investigation

5. Raising a concern

You can raise a concern through any of these routes. You do not have to use your line manager, and you do not have to try one route before another.

- Your line manager or any other manager you trust
- The Global Safeguarding Lead, for anything involving harm to a person
- The Co-CEO, Innovation and Operations, for anything involving money, conduct or employment
- The Safeguarding Lead on the AL Global Board of Directors, for anything involving a Co-CEO, senior management or the Board, or where internal routes feel unsafe
- The Chair of the Board, if the Board Safeguarding Lead is unavailable or is the subject of the concern
- A regulator, donor, lawyer or the police, at any time, without telling AL first

AL does not currently operate an independent external reporting channel. Until it does, route 4 is the furthest a report can travel inside AL. The Board reviews this gap annually.

The Speak Up Policy sets out what happens next and how quickly.

Contact details for each role are held in the Speak Up Policy Annex A, which is updated as post holders change.

6. How we uphold this Code

- Every person listed in section 2 signs the Code on joining and confirms it annually.
- Everyone receives an induction briefing on the Code, safeguarding and speaking up within 30 days of starting.
- Managers are assessed on whether their team can and does raise concerns.
- Breaches are handled under the Speak Up Policy and, for employees, the disciplinary procedure in the Employee Handbook. Employment of US-based staff is at will. Staff based outside the United States are dismissed only in line with the labour law of the country where they work. See Employee Handbook, section 3.1.
- The Co-CEO, Innovation and Operations reports annually to the Governance Committee, and through it to the full Board, on Code breaches, patterns and action taken. The report is anonymised.
- Contracts with consultants, contractors, grantees and sub-awardees include a requirement to comply with this Code and to report breaches to AL.
- Fiscal partnership agreements include the same requirement. Model A project staff sign this Code on joining, as AL employees. Model C client agreements carry a flow-down clause and an equivalence assessment.

7. Acknowledgement

I have read the Accountability Lab Code of Conduct. I understand what it requires of me. I understand that I am required to report suspected breaches, and that breaching the Code may end my engagement with AL.

Name:

Role:

Signature:

Date:

