

CODE OF CONDUCT [UPDATED JULY 23, 2018]

As a condition of service with East-West Management Institute, Inc. (“EWMI”), each EWMI associate will abide by the standards and rules of this Code of Conduct and will report any violation of it to EWMI’s President.

1. East-West Management Institute, Inc. (“EWMI”) and its directors, officers, employees, consultants, contractors and agents (“EWMI associates”) will uphold the highest ethical and professional standards. They will conduct themselves with honesty, loyalty and respect for their colleagues, clients, sponsors and partners.
2. EWMI and EWMI associates will comply with the laws and regulations of the United States and of the host government.
3. EWMI associates will exercise honesty and diligence in performing their duties and undertaking their responsibilities.
4. EWMI associates, except for EWMI’s directors, independent contractors, part-time consultants and others where permitted in writing by EWMI’s President, will devote their full time and attention to EWMI’s business during customary working hours and will not participate in outside personal activities that might detract from this requirement. For purposes of this Code of Conduct, “independent contractors” are companies or individuals hired to undertake specific tasks but who are left free to do the assigned work and to choose the method of doing it.
5. EWMI associates and their dependents who are on assignments in foreign countries will comport themselves in a manner that will reflect favorably on EWMI. EWMI associates will not participate in any business activity in the host country outside the scope of their EWMI employment.
6. No EWMI associate or member of his or her immediate family will, for a corrupt purpose, seek or accept from a U.S. government or foreign official, another EWMI associate, or any other person or entity in a business relationship with EWMI, cash, loans, commissions, services, pleasure travel, personal discounts, gifts, employment, entertainment, or anything else of value.
7. Unless reasonably contemplated in the scope of project activities and permitted by law, EWMI does not make contributions to political candidates, political parties, or to any person or entity affiliated with a political party. EWMI associates will not contribute anything of value to a political party, candidate for office, or to any person or entity affiliated with a political party for the purpose of seeking to gain an improper advantage or to obtain or retain business. These restrictions do not affect the right of EWMI associates to make contributions to political candidates, parties or affiliated persons or entities in the EWMI associates’ respective countries of citizenship or residence from their personal funds, to the extent permitted by law.
8. EWMI funds may not be used for any unlawful purpose or in any manner other than in accordance with appropriate project and or corporate policies. EWMI associates will not create or use a secret or off-book fund or falsify or fail to state adequately a corporate or project account.
9. EWMI associates will not offer, promise or pay anything of value to a government official except for (i) appropriate grants, (ii) appropriate travel and business meal expenses, or (iii) expenses reasonably contemplated in the scope of project activities.
10. EWMI associates will safeguard all corporate and project assets.

11. EWMI associates must perform their duties in pursuit of EWMI's best interests and must refrain from letting personal interests influence, or appear to influence, EWMI's activities. If a situation arises where a EWMI associate believes it is impossible to avoid a conflict of interest, or the appearance of a conflict of interest, the EWMI associate must inform his or her supervisor and provide a full written explanation to the EWMI Executive Vice President, in advance, if possible.
12. EWMI associates will not exploit for their own personal gain opportunities that come to their attention through their position with EWMI, EWMI activities, or information that comes to EWMI, unless the opportunity is fully disclosed in writing to a EWMI officer, and EWMI explicitly declines to pursue the activity. In the case of directors and officers, disclosures will be made to the Board of Directors who will determine whether or not EWMI will pursue the activity.
13. EWMI supports the Universal Declaration of Human Rights. EWMI associates will not cause human rights abuses or assist or promote such abuses with any government, government official, or governmental instrumentality that engages in human rights abuses.
14. EWMI does not tolerate, and no EWMI associate will engage in workplace sexual harassment or other forms of harassment, nor will they engage in sexual exploitation or sexual abuse.
15. EWMI maintains a drug-free workplace. EWMI associates will not manufacture, distribute, dispense, buy, sell, exchange, possess, or use a controlled substance in any EWMI place of business or work site in violation of relevant laws.
16. EWMI associates will not knowingly provide, and will take steps to ensure that EWMI does not provide, material support or resources to any individual or entity that commits, attempts to commit, advocates, facilitates, or participates in terrorist acts, or has committed, attempted to commit, facilitated, or participated in terrorist acts.
17. EWMI associates will not engage, on their own behalf or on behalf of EWMI, in any transaction in which a country subject to U.S. embargo restrictions has a direct or indirect interest, and shall not participate in foreign boycotts prohibited or penalized by the U.S. Departments of Treasury or Commerce.
18. No EWMI associate may engage in any of the following activities: (a) any form of trafficking in persons, (b) using forced labor in conducting any work, or (c) procuring a commercial sex act.
19. To minimize the risk of child abuse, exploitation, or neglect within EWMI programs, EWMI associates: (i) will ensure compliance with host country and local child welfare and protection legislation or international standards, whichever gives greater protection, and with U.S. law where applicable; (ii) will not engage in child abuse, exploitation, or neglect; (iii) will consider child safeguarding in project planning and implementation to determine potential risks to children that are associated with project activities and operations; (iv) will limit their unsupervised interactions with children within the context of EWMI programs; (v) will not expose themselves to child pornography; (vi) will comply with applicable laws, regulations, or customs regarding the photographing, filming, or other image-generating activities of children; and (vii) will report allegations of child abuse, exploitation or neglect within the context of EWMI programs to their supervisor.
20. EWMI associates will not instruct or permit any person to engage in any activity on behalf of EWMI or a EWMI associate that would violate this Code of Conduct.

Name:

Date: _____