



Thriving Together An Entrepreneurial Mindset Transformative Results Thoughtful Innovation Integrity Lived

# Code of Ethics & Business Conduct

# 2024





## Igniting **Opportunity.** Advancing Global **Good.**

### Our **Values**



#### **Thriving Together**

Our collective success comes from a shared sense of purpose, the inclusion of diverse perspectives, and a commitment to thoughtful, ongoing collaboration with all our stakeholders.



#### **An Entrepreneurial Mindset**

An entrepreneurial spirit and a resourceful can-do mentality live in each Resonator and stretch out into every aspect of our work. Resonators are encouraged and empowered to think outside the box, to find a way to make a difference in their work within the company, with our clients, and within our communities.



#### **Transformative Results**

We are both a mission-driven and performance-oriented business that delivers transformative outcomes for our clients. We believe every engagement should lead to financially sustainable, tangible results that drive positive transformation for both the business community and vulnerable populations.



#### **Thoughtful Innovation**

Resonators are dedicated problem solvers who rise to each challenge with open minds, deep expertise, and a focus on transformative solutions. We know what it takes to turn bold ideas into effective, real-world solutions for companies and communities.



#### **Integrity Lived**

To truly succeed, whether it's client-facing work or internal strategy, Resonators act with integrity, authenticity, and empathy. Only through honest input, listening, and feedback can we truly engage our stakeholders and earn their trust to build long-lasting relationships.





## TABLE OF CONTENTS

<u>A Message from the President and CEO</u>	4
<u>Background/Purpose of the Resonance CODE OF ETHICS &amp; Business Conduct</u>	5
<u>Treating all with Dignity and Respect</u>	6
1. <u>Prohibition Against Discrimination of Any Kind</u>	6
2. <u>Prohibition Against Harassment and Bullying</u>	7
3. <u>Prohibition Against Sexual Exploitation, Harassment, and Abuse</u>	7
<u>Prohibition Against Trafficking in Persons</u>	8
<u>Safeguarding Children</u>	10
<u>Promoting Safety and Security in the Workplace</u>	10
<u>Conducting Business Ethically and with Integrity</u>	11
1. <u>Preventing Bribery, Graft, Facilitation Payments, Money-Laundering, and Corruption</u>	11
2. <u>Preventing Fraud, Waste, and Abuse</u>	12
3. <u>Avoiding Organizational Conflicts of Interest</u>	12
4. <u>Avoiding Personal Conflicts of Interest</u>	13
5. <u>Ensuring Fair Competition and Good-Faith Dealings</u>	14
6. <u>Complying with International Trade Sanctions and Customs Laws</u>	14
7. <u>Declining Excessive Gifts and Entertainment</u>	15
8. <u>Maintaining Accurate Business and Financial Records</u>	15
<u>Safeguarding Information</u>	16
1. <u>Protecting Confidential Information and Data</u>	16
2. <u>Not Infringing on Intellectual Property Rights of Others</u>	16
<u>Procedure for Reporting Misconduct</u>	17
1. <u>Resonance Hotline for Reporting Misconduct</u>	17
2. <u>Employee Whistleblower Protections</u>	18
<u>Code of Conduct Acknowledgment</u>	19

## A MESSAGE FROM RESONANCE PRESIDENT & CEO

Dear Resonance Colleagues:

All of us at Resonance are committed to our mission:

**Igniting Opportunity. Advancing Global Good.**

Resonance believes that local stakeholders and partners should be the ultimate decision-makers, actors, and drivers of change. They understand what is best for them and their communities. At Resonance, we see our role as catalysts and implementers, and we seek to ignite opportunities that can initiate a chain reaction for impact.

In our work, we aim to support local entrepreneurs to build successful businesses, change-makers to improve their communities, NGOs to fulfill their missions, and businesses to create better outcomes in a climate impacted world. We believe that real change will happen when these groups come together around the big global challenges, and we seek opportunities to ignite that spark.



Nazgul Abdrazakova  
PCEO

Our mission and values inform everything we do in our company. We empower people, markets, and communities to tackle the great challenges facing the world today. We all must be committed to doing this work in an ethical and compliant manner to ensure the highest level of integrity in all that we do.

This Code of Ethics and Business Conduct (herein the “Code”) defines how Resonance carries out its business across the world. All of us at Resonance must comply with it to ensure our commitment to our shared ethical culture.

Thank you for following Resonance’s Code every day in your work and your actions.





## RESONANCE CODE OF ETHICS & BUSINESS CONDUCT

The Resonance Code is centered around our common set of core values that fosters an inclusive “all hands-on deck” attitude and underpins our commitment to purpose-driven work that creates opportunity and drives impact. These values are inherent in Resonance’s commitment to professionalism, inclusiveness, fair, just, and caring treatment in our work, for our employees, our colleague relationships, and in our daily interactions with all stakeholders.

In line with these Resonance values, this Code informs us how to conduct our business with integrity, morality, honesty, transparency, and fairness, with respect to the human rights of all. It also communicates Resonance’s commitment to these values to all employees, agents, partners, clients, customers, stakeholders, partners, and the communities where we work.

**The Resonance Code of Ethics & Business Conduct addresses specific guiding principles to be consulted whenever ethical or compliance questions arise regarding conducting Resonance business appropriately and in adherence to applicable laws and regulations and Resonance standards. Resonance provides periodic training to all its employees on the Code and policies.**

The Code applies to all Resonance employees and agents (including advisors, consultants, and contractors). Anyone representing Resonance – including partners, contractors, and grantees must act in compliance with the principles set out in our Code. We are all responsible for ensuring our business is conducted according to our Code, therefore we must report any violations or compliance concerns to the appropriate channels, as set forth herein, promptly so any potential violation may be addressed. Reporting shall be encouraged and never retaliated against.



# TREATING ALL WITH DIGNITY AND RESPECT

*Photo Caption: Courtesy of New Sun Road, a local partner in USAID-supported MujerProspera Challenge, implemented by the Resonance-managed Catalyst Initiative*

Resonance values a diverse and inclusive workforce where everyone is treated with dignity, understanding, and respect. Inclusive and equitable collaboration is essential for driving sustainable global development and is core to the Resonance mission. That same spirit of diversity, shared humanity, collaboration, and inclusion is at the heart of who we strive to be as a company. We are committed to an environment where every individual can thrive and be empowered by a sense of belonging, respect, and equity.

## 1. Prohibition Against Discrimination of Any Kind

Throughout the employment process, Resonance is firmly committed to prohibiting discrimination against individuals because of race, color, sex, sexual orientation, age, religion, crime victim status, national origin, ancestry, or place of birth, gender identity and expression, or against qualified individuals with disabilities or any other legally protected status.



**By providing equal access and fair treatment to all employees, we improve the success of Resonance and enhance the progress of individuals and the communities where our businesses are located.**

Resonance is committed to observing all applicable labor and employment laws wherever we operate. That includes observing these laws that pertain to freedom of association; privacy; recognition of the right to engage in collective bargaining; the prohibition of forced, compulsory, and child labor; and those laws that pertain to the elimination of improper employment discrimination. All of us at Resonance should immediately refer any complaints or charges of discrimination to your manager, the Human Resources Department or anonymously to the Resonance hotline. Retaliation against an employee for reporting or making a charge of discrimination is prohibited.



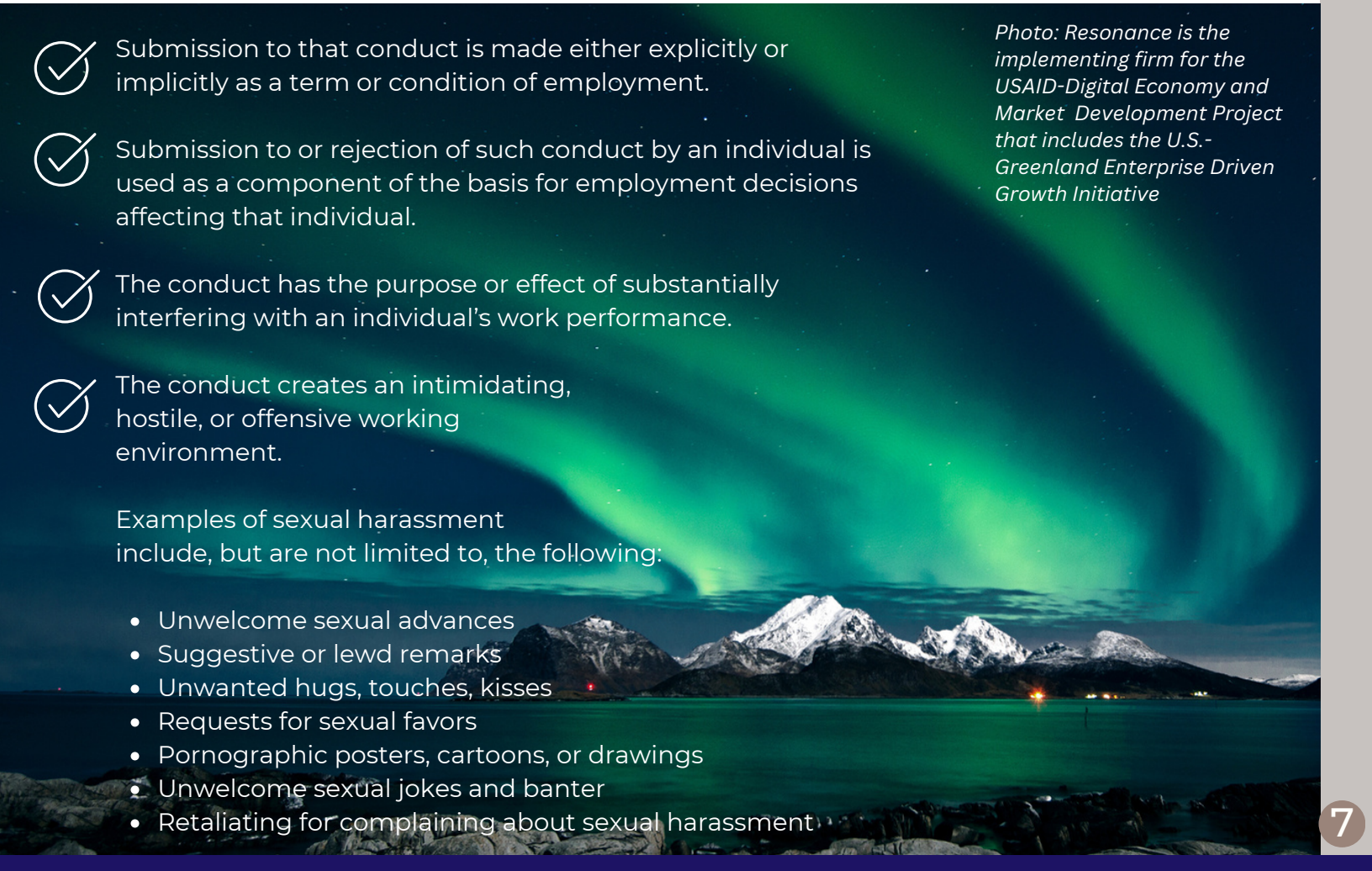
## 2. Prohibition Against Harassment and Bullying

Resonance offers fair and equal employment opportunity to every person, regardless of age, race, color, religion, disability, marital status, sex, sexual orientation, crime victim status, national or ethnic origin, citizenship, veteran status, gender identity and expression, or other legally protected status, as required by law. Resonance also seeks to provide a work environment that is free from intimidation and harassment based on any of these characteristics and specifically prohibits such intimidation and harassment. Every employee has the right to work in an environment free from intimidation, insult, ridicule, and bullying. If an employee believes that they have been subjected to discrimination or harassment, that employee should follow the reporting procedure outlined in this Code under the “Procedure for Reporting Prohibited Conduct”.

## 3. Prohibition Against Sexual Exploitation, Harassment, and Abuse

Resonance prohibits sexual harassment of all its employees or independent contractors. Sexual harassment is unlawful under state and federal law. We are committed to providing a workplace free from this unlawful conduct.

Definition of Sexual Harassment: sexual harassment is a form of sex discrimination and means unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature, including any of these situations:

- 
- ✓ Submission to that conduct is made either explicitly or implicitly as a term or condition of employment.
  - ✓ Submission to or rejection of such conduct by an individual is used as a component of the basis for employment decisions affecting that individual.
  - ✓ The conduct has the purpose or effect of substantially interfering with an individual's work performance.
  - ✓ The conduct creates an intimidating, hostile, or offensive working environment.

*Photo: Resonance is the implementing firm for the USAID-Digital Economy and Market Development Project that includes the U.S.-Greenland Enterprise Driven Growth Initiative*

Examples of sexual harassment include, but are not limited to, the following:

- Unwelcome sexual advances
- Suggestive or lewd remarks
- Unwanted hugs, touches, kisses
- Requests for sexual favors
- Pornographic posters, cartoons, or drawings
- Unwelcome sexual jokes and banter
- Retaliating for complaining about sexual harassment



# PROHIBITION AGAINST TRAFFICKING IN PERSONS

Resonance has zero tolerance for trafficking in persons in any form and operates in total compliance with client laws and regulations, as well as our global partner policies. All individuals and companies working with Resonance are prohibited from engaging or supporting any forms of trafficking in persons as defined by the United Nations Protocol and US Government/USAID regulations below.

“Trafficking in Persons” (as defined in the Protocol to Prevent, Suppress, and Punish Trafficking in Persons, especially Women and Children) shall mean the recruitment, transportation, transfer, harboring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.

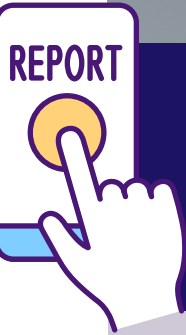
Under US government (USG) acquisition regulations and US Agency for International Development (USAID) regulations “trafficking in persons” also includes the:

- Procurement of a commercial sex act
- Use of forced labor
- Acts that directly support or advance trafficking in persons, including the following acts:
  - ✓ Destroying, concealing, confiscating, or otherwise denying an employee access to that employee's identity or immigration documents;
  - ✓ Failing to provide return transportation or pay for return transportation costs to an employee from a country outside of the country from which the employee was recruited upon the end of employment if requested by the employee, unless exempted from the requirement to provide or pay for such return transportation by USAID or its prime contractor; or if the employee is a victim of human trafficking seeking victim services or legal redress in the country of employment or a witness in a human trafficking enforcement action;
  - ✓ Soliciting a person for the purpose of employment, or offering employment, by means of materially false or fraudulent pretenses, representations, or promises regarding that employment;
  - ✓ Charging employees recruitment fees; or
  - ✓ Providing or arranging housing that fails to meet the country of performance housing and safety standards.



# PROHIBITION AGAINST TRAFFICKING IN PERSONS

Resonance employees, our contractors, subcontractors, and grantees at any tier, and our labor recruiters, brokers or other agents are required to comply with all anti-trafficking laws and regulations. Resonance's Combating Trafficking in Persons Plan (the "Plan") found on the ECCO SharePoint intranet page, is applicable to all of Resonance's projects with the U.S. government. Employees are required to read this plan and comply with it as well as attend periodic training on compliance with this Code provision and plan.



Any violation of the Anti-Trafficking policies set forth in the Code must be immediately reported to your manager, the Resonance Hotline (see Reporting Misconduct below and p. 17), or the Enterprise Contract, Compliance, and Operations (ECCO) Director.

In addition, employees may report suspected violations to:

The **24-hour Global Human Trafficking Hotline:**

**PHONE:** 1-844-888-FREE **Email:** [help@befree.org](mailto:help@befree.org)

**AND/OR Utilize the RESONANCE HOTLINE established for reporting any/all incidences of misconduct outlined in this CODE (Page 17).**

**RESONANCE HOTLINE:** 1-866-921-6714 (Toll Free in USA)

**On the internet at:** <https://www.integritycounts.ca/org/Resonance>

**Via email** to [Resonance@integritycounts.ca](mailto:Resonance@integritycounts.ca)

**See also Project Specific Hotline Numbers Posted in Site Offices**

If Resonance is made aware of any credible information from any source pertaining to a suspected trafficking violation, or concerning sexual harassment or abuse, Resonance will investigate such allegations, and take appropriate remedial measures and notification actions as required in the Plan.





## SAFEGUARDING CHILDREN

Resonance strictly follows U.S. federal law, as well as local and international laws and standards for the protection of child welfare. Resonance is committed to preventing child abuse, exploitation, or neglect. Neither Resonance nor its employees, contractors, subcontractors, vendors (or employees or agents thereof) shall engage in, support, or promote child abuse, exploitation, or neglect in any country where we do business. Child abuse, exploitation, or neglect is strictly prohibited, and any violation of this policy will result in termination of employment. Resonance ensures that its projects incorporate child safeguarding in planning and implementation to prevent child abuse, exploitation, and neglect. All Resonance employees are directed to report any violations of this child safeguarding policy immediately to their manager, the Compliance team, or to the Resonance Hotline (see Reporting Misconduct on Page 17) . Resonance requires those who work on our projects to comply with the following child safeguarding principles:

- Ensure compliance with host country and local child welfare and protection legislation or international standards, whichever gives greater protection, and with US law, where applicable;
- Prohibit all personnel from engaging in child abuse, exploitation, or neglect;
- Consider child safeguarding in project planning and implementation to determine potential risks to children that are associated with project activities and operations;
- Apply measures to reduce the risk of child abuse, exploitation, or neglect, including, but not limited to, limiting unsupervised interactions with children; prohibiting exposure to pornography; and complying with applicable laws, regulations, or customs regarding the photographing, filming, or other image-generating activities with children;
- Promote child-safe screening procedures for personnel, particularly personnel whose work brings them in direct contact with children;
- Have a procedure for ensuring that personnel and others recognize child abuse, exploitation, or neglect;
- Mandate that personnel and others report allegations; investigate and manage allegations; and take appropriate action in response to such allegations, including, but not limited to, dismissal of personnel.

## PROMOTING SAFETY AND SECURITY IN THE WORKPLACE

Resonance prohibits the unauthorized possession or use of weapons, explosives, and dangerous materials on our premises or in conducting our business. You should immediately report violent or threatening behavior, suspicious activities or persons, and other prohibited conduct to your manager. It is a serious offense to breach this Code, and anyone who does so will be subject to disciplinary action, up to and including termination. Resonance maintains a **Safety and Security Manual** that can be found on the ECCO page under Documents/Safety and Security Manual for additional information.



# ETHICS

## CONDUCTING BUSINESS ETHICALLY AND WITH INTEGRITY

Trust and honesty are central to Resonance's business philosophy and to our way of working together. Our Code encourages a friendly, respectful, cooperative, collaborative working environment, and it enables us to build positive relationships with employees, clients, and vendors. We expect all Resonance employees to follow our Code and to act with integrity, respect, dignity, and professionalism—internally and when dealing with clients, vendors, other business partners, and in the community. By doing so, you will:

- Avoid the potential for conflict between personal interests and those of our Company, clients, or vendors—including showing favoritism of any kind;
- Not give or accept inappropriate gifts from vendors or clients;
- Safeguard confidential information about our Company, clients, employees, or vendors;
- Maintain high ethical standards in acquiring information and commenting about our competitors;
- Engage in open and honest communication;
- Apply the same high standards when representing Resonance within your community;
- Respect the trust of our organization and those with whom we do business;
- Follow all Resonance guidelines, submit accurate time records, and expense reports;
- Deal with each other truthfully and honestly.

Resonance employees shall pay special attention to the following areas of conduct:

### 1. Preventing Bribery, Graft, Facilitation Payments, Money-Laundering, and Corruption

Resonance is committed to honesty, transparency, and fairness in all business conduct. There is zero tolerance for any form of corruption in our business dealings, including but not limited to, “paying, or taking bribes and graft [illegal or unfair gain of something of value], making facilitation payments, or money-laundering.” You should not offer, directly or indirectly through a third party, anything of value to improperly obtain or retain business, get an unfair business advantage over a competitor, or expedite award of business. Payment can be in any form, cash, gifts, meals, donations, sponsorships, or anything that could be of value to the recipient. You are prohibited from making even small payments to “expedite or grease” approvals or actions on the part of government officials. Resonance employees, agents, contractors, subcontractors, and grantees must comply with all laws and regulations prohibiting bribery, graft, facilitation payments, and money laundering, such as the U.S. Foreign Corrupt Practices Act (15 U.S.C. § 78dd-1, et seq.) Under certain limited circumstances, Resonance may pay for the commercial services of an expeditor to process goods through customs.

# CONDUCTING BUSINESS ETHICALLY AND WITH INTEGRITY

Resonance employees should also guard against illegal customer or supplier financial transactions used to launder money. Money laundering is the process by which persons or groups try to conceal the proceeds of illegal activities or try to make sources for their illegal funds look legitimate. This can be done when a potential customer or supplier requests Resonance to make payments in cash or from a nonbusiness account or other unusual payment term. Resonance fosters compliance with the spirit and letter of all applicable anticorruption laws and regulations. **You should contact the ECCO team if you have questions about any payment or are unsure how to proceed.** You must report any suspected bribery payments, demands for a bribe, or money laundering to your manager, the ECCO team, or anonymously to the Resonance Hotline (see Reporting Misconduct on Page 17).

## 2. Preventing Fraud, Waste, and Abuse

Resonance does not tolerate fraudulent activity, waste of company or client resources or abuse of authority by any Resonance employee, representative, agent, contractor, subcontractor, vendor, or grantee. We must all do our best to prevent, detect and report fraud, waste, and abuse in our workplace and to immediately report any violations we become aware of through the reporting channels set forth in the Reporting Misconduct section of our Code (p. 17). Such reports may be made anonymously on the Resonance Hotline if you feel uncomfortable about going to your manager directly. Those with knowledge of the activities that constitute fraud, waste, or abuse shall cooperate if an investigation is undertaken based on the report received.

## 3. Avoiding Organizational Conflicts of Interest

In conducting Resonance business fairly and openly we must be mindful that we are making business decisions objectively and not with any organizational conflict of interest. An organizational conflict may arise if Resonance has other business activities or relationships with other entities that prevent our company from rendering impartial assistance or advice to our clients, prevents us from performing our work in an objective way, or gives us unfair competitive advantage over our competitors. Such conflicts may arise if we have access to procurement information that is not publicly available because of a unique position we may have with our clients, or because employees have worked in our competitor's businesses, or we hire employees working previously for our clients. Any of the above circumstances may require Resonance to disclose an actual or potential conflict in competing for work, or in fulfilling our contracts, and we may need to take action to mitigate the impact of any bias or unfair competitive advantage.

**If you have questions or concerns regarding actual or perceived organizational conflicts of the company or circumstances where disclosure is required, please consult your manager and the ECCO team for assistance.**





## 4. Avoiding Personal Conflicts of Interest

In working for Resonance, we are all committed to acting with integrity in all our business dealings and projects. Therefore, we must be mindful that we are not letting actual or apparent personal conflicts of interest hinder our judgement or decisions. Conflict of interest can cause our personal interests to bias our professional judgement, therefore we must be completely transparent when circumstances arise that could cause such a conflict.

The following are areas where potential personal conflicts of interest can arise and that should be disclosed:

- ✓ Outside Employment: Holding a second job while working full-time for Resonance where the second job is work that poses a conflict with your position in the company.
- ✓ Financial Interest: Owning a financial interest in a business that competes with or seeks to do business with Resonance.
- ✓ Employment of Relatives and Friends: Hiring or supervising a friend or relative.
- ✓ Awarding or overseeing a contract, subcontract, purchase order, or grant to an entity that is owned by or employs a friend or relative.
- ✓ Board Participation: Serving on the board of a competitor, client, supplier, or other service provider.
- ✓ Proprietary Information: Resonance employees may have access to company proprietary information as well as confidential and proprietary information of others that should never be used for personal gain.

You must report actual or potential personal conflicts of interest by promptly and fully informing your manager, Human Resources, or the ECCO Director of any situation that could raise questions or concerns about your objectivity or bias in performing your work. If you believe others have a conflict of interest in performing their work you should raise this concern to the individual, your manager, the ECCO Director or report it to the Resonance Hotline (see Reporting Misconduct on Page 17). If you are working a second job you must report such work to Human Resources for awareness. If you are unsure whether accepting work will pose a conflict of interest with your employment at Resonance you should consult with the ECCO Director.

## 5. Ensuring Fair Competition and Good-Faith Dealings

Resonance promotes compliance with all laws and regulations that prohibit unfair competition and promote good-faith dealings in contracting in the countries in which we deliver services. These laws can be complex so if you have any questions or concerns about any action that might be perceived to be in violation of these principles you should consult your manager or the ECCO team. We must always conduct ourselves in line with our commitment that we are competing on a fair business field in all our dealings whether it be with competitors, partners, subcontractors, or vendors. We will never enter into agreements or understandings with competitors or businesses where we agree to allocate or divide markets by bidding on or not bidding on opportunities, thereby “fixing” markets and bids.

*We will compete fairly for all business opportunities and ensure that those bidding on work with Resonance are doing the same. In soliciting supplies, goods, and services we promote fair competition from our suppliers and vendors to guarantee that the prices we receive are reasonable and obtain the best value for the company and for our clients. Resonance's procurement policies and procedures must be adhered to so that we are aligned with these principles.*



## 6. Complying with International Trade Sanctions and Customs Laws

Procuring equipment, supplies, and materials under contracts, subcontracts, cooperative agreements and grants are subject to trade sanction laws and regulations. Resonance complies with United States sanctions (including those set by the United States Office of Foreign Asset Control or OFAC), as well as international trade sanctions set by the United Nations, the European Union, and the United Kingdom Foreign and Commonwealth Office. These sanctions relate to among other things, Counter Narcotics Trafficking; Counter Terrorism; Non-Proliferation; Rough Diamond Trade Controls; and Transnational Criminal Organizations. Resonance also complies with all provisions for importing and exporting goods, services, and information including the requirements of customs and foreign trade regulations in all countries where Resonance conducts business. Compliance with these laws and regulations can be challenging to keep abreast of, therefore if you have any questions concerning the application of trade sanctions to your activities, please contact the ECCO Director for guidance.



## 7. Declining Excessive Gifts and Entertainment

Resonance permits hospitality under specific circumstances. Bona fide hospitality or other business expenditure with the aim of presenting Resonance's services, or establishing cordial relations is permitted. However, hospitality or promotional expenditure can be misinterpreted as bribery or graft and Resonance employees must keep in mind appearances and perceptions and not offer hospitality where it could be mistaken to have the intention of influencing a government official or client representative to secure a business advantage, to perform a function improperly or to expedite the performance of a routine government action. We must be very careful not to put government employees in a position where they may be violating laws and regulations prohibiting them from accepting gifts of any kind (see 5 Code of Federal Regulations (CFR) 2635 pertaining to US government employees).

Receipt and provision of gifts, favors, discounts, benefits, entertainment, or other item of monetary value must be carefully considered. No gifts may be made to government officials in return for favorable action or decisions on their part. We must always consider how others would perceive our actions in giving or receiving gifts, entertainment, or hospitality. Resonance approved branded promotion items (pens, notepads, hats, plaques, certificates for example) may be offered to clients. Occasionally modest gifts, items of food, meals, refreshments, and nonalcoholic beverages may be provided to non-US clients or accepted by Resonance employees. The value of such items, meals, incidentals shall not exceed USD \$20 per person/per occasion and shall in no event exceed USD \$50 per year per person. Should you receive a gift that does not meet these criteria, you should return it with a letter explaining Resonance's policy. If a gift is impractical to return, management may make it available to all staff or donate it to charity. Consult the ECCO team if you are unsure about compliance with these provisions.

Honoraria shall not be paid to US government officials. For non-US government officials and others, honoraria must be paid in accordance with Resonance's **Payment of Honoraria Policy** and any Resonance project honoraria policies. Please consult the ECCO team if you have questions about honoraria payments.

## 8. Maintaining Accurate Business and Financial Records

It is an important business tenant at Resonance that employees accurately, truthfully, and completely create and maintain the business and financial records for which they are responsible in accordance with our internal controls, policies, and procedures. The accuracy of our records is key to Resonance's credibility in the marketplace, as well as our compliance with contractual, legal, financial, tax, and other reporting responsibilities of the company. All financial books, records, and accounts must accurately reflect transactions, and conform both to generally accepted accounting principles, as well as applicable laws, regulations, and contractual terms and conditions. You must never knowingly offer or enter misleading or inaccurate information in the preparation of any record or report, or tamper with any record or report.



# SAFEGUARDING INFORMATION

## 1. Protecting Confidential Information and Data

Resonance is committed to ensuring the security and privacy of the personal information that we process, as well as to providing a compliant and consistent approach to data privacy. Resonance maintains a data protection program that complies with existing law and abides by accepted data protection principles, including U.S. data privacy protection laws and personally identifiable information laws. Resonance employees are performing work world-wide therefore we should be aware that these laws, other local laws, or laws dictated in our client contracts, may apply to proposals, contracts, subcontracts, employee data, vendors, external facing websites, email marketing, and other data wherever we are working. As Resonance employees we must be vigilant in protecting proprietary and confidential information obtained in the performance of our work. Such information includes any information that is not in the public domain and if released could adversely impact an individual's privacy or a business/organization's competitiveness or is held confidentially by a client. Some examples of confidential information include financial reports, pricing, salaries, rates, proposals, NICRA, tax returns, and contracts.

Resonance only collects personal information when the data is necessary for business purposes. We collect it in a lawful and fair manner, relying primarily on the consent of individuals to collect, process, and hold data. Personally identifiable information for individuals that is protected under U.S. law includes: medical records, school records, social security numbers, addresses, phone numbers, email addresses, tax returns, credit card information as examples. Sharing such information outside of Resonance, or even internally, may require special handling including encryption and other forms of protection. Access to such information should be limited even within Resonance with only access on a need-to-know basis to protect Resonance from unlawful access or inadvertent release. Any accidental or unlawful breach of personal data must be reported immediately to your manager and the ECCO team as soon as possible.

## 2. Not Infringing on Intellectual Property Rights of Others

Resonance recognizes and protects the intellectual property (creations of the mind) of others, such as inventions, literary and artistic works, designs, writings, symbols, names, and images created by others. Resonance strictly adheres to all laws and regulations related to copyright, trademark, and patents.







# PROCEDURE FOR REPORTING MISCONDUCT

## 1. **Resonance Hotline** for Reporting Misconduct

As presented in the Code there are many avenues for Resonance employees and those that we work with to ask questions about the Code principles and policies or to report concerns.

Your manager is a good resource to talk to if you have questions or concerns.

The ECCO team is also a great resource to answer questions about particular laws, regulations, policies and procedures addressed in the Code and in other policies and procedures.

The Human Resources department is also available to answer questions.



If for any reason you are not comfortable reporting a concern or asking a question of these resources, the **Resonance Hotline** incorporates industry best practices and is provided through an independent third party (IntegrityCounts) for you to reach out to. This service is intended to provide you an unbiased and anonymous outlet for reporting troubling workplace situations when you are not comfortable with alternative outlets.

Resonance's ethics reporting service ensures that you can raise concerns regarding inappropriate conduct in good faith without being subjected to retaliation, harassment, or discriminatory treatment. External parties including subcontractors, vendors, grantees, clients, and partners may also report any issues of concern via the hotline.

### The following are ways to report a concern:

1. On the internet at <https://www.integritycounts.ca/org/Resonance>
2. Via email to [Resonance@integritycounts.ca](mailto:Resonance@integritycounts.ca)
3. By calling 1-866-921-6714 (Toll Free in USA)
4. See also Project Specific Hotline Numbers Posted in Site Office



**Each report to the hotline will be investigated thoroughly and appropriately.**

## 2. Employee Whistleblower Protections

The Resonance Code of Conduct supports and encourages everyone to report any misconduct or violation of our principles. Resonance protects reporters of misconduct and maintains policies and processes to enable you to raise any matters of concern without fear of disciplinary action being taken against you for making reports.

Resonance will review any report made and investigate appropriately. Resonance prohibits retaliation, in any form, against anyone who reasonably believes there has been a violation or suspected violation of this Code, company policy, or applicable law. Retaliation actions that are prohibited include: adverse employment actions, acts or attempted acts of interference, reprisal, threats, coercion, or intimidation against anyone who reports, participates in an investigation, or is responsible for investigating possible improper or illegal activities. If Resonance finds retaliation is taken in any form, it will result in discipline against the retaliator up to and including termination of employment.

These whistleblower protections encompass Resonance employees, consultants, contractors, subcontractors, grantees, suppliers, and vendors.





## CODE OF CONDUCT ACKNOWLEDGMENT

All Resonance employees must read and acknowledge annually that they will comply with Resonance's Code of Conduct. They also agree to take periodic compliance training addressing the principles set forth in the Code. This acknowledgment confirms that as a Resonance employee you agree to abide by the principles in the Code in your work for Resonance. A copy of this acknowledgment will be retained in your employee file.

**Download this page** of your CODE PDF and complete, either by hand or utilizing a PDF reader that allows inserted text boxes (using the draw function in Acrobat for your signature, or import/upload your electronic signature). Save your PDF and attach the file and email to both Resonance Human Resources at [HR@Resonanceglobal.com](mailto:HR@Resonanceglobal.com) AND [DL\\_ECCO@resonanceglobal.com](mailto:DL_ECCO@resonanceglobal.com)

### Acknowledgment by Employee

I acknowledge that I have read Resonance's Code of Conduct and agree to comply with its values, principles, and standards of professional conduct. I acknowledge that it is my responsibility to seek guidance if I have questions about the Code or if circumstances arise involving any of the principles set forth in it. I understand that the Code may be updated from time to time and that I am responsible for keeping informed about such changes that will be brought to my attention by Resonance's ECCO team and/or Human Resources team. I agree to report any suspected violations of the Code and cooperate with investigations if requested to do so.

Employee's Signature: \_\_\_\_\_

Employee's Name (Printed): \_\_\_\_\_

Location (City, State/Province, Country): \_\_\_\_\_

Today's Date: \_\_\_\_\_