Living Our Values

Code of Conduct

Questions & Answers

Ethics & Business Conduct
Our Mission

- To fight poverty with passion and professionalism for lasting results
- To help people help themselves and their environment by providing resources, sharing knowledge, building capacity, and forging partnerships in the public and private sectors
- To be an excellent institution able to attract, excite and nurture diverse and committed staff with exceptional skills who know how to listen and learn

Our Guiding Principles

- Client centered
- Working in partnership
- Accountable for quality results
- Dedicated to financial integrity and cost-effectiveness
- Inspired and innovative

Our Core Values

- Personal honesty, integrity, commitment
- Working together in teams — with openness and trust
- Empowering others and respecting differences
- Encouraging risk-taking and responsibility
- Enjoying our work and our families
This Supplement to the World Bank Group’s Code of Conduct is designed to illustrate the application of the Code and relevant rules and guidelines to various business conduct situations. It is not intended to offer comprehensive guidance, but to demonstrate how the decision-making tools, resources and principles described in the Code can be applied in practice.
FAIR AND RESPECTFUL TREATMENT

Q I am a short-term consultant in the Bank Group. Do the respectful-treatment-related concepts described in the Code apply equally to me?

A Yes. The principles outlined in the Code apply to all World Bank Group staff. They also apply to our interactions with other stakeholders, including contractors, vendors, and our local community.

APPROPRIATE USE OF POWER

Q A manager recently moved to my country office, where I am the information technology (IT) specialist. I set up his Internet connection at home, so he could use his office-supplied laptop. The next day at the office, he asked me to fix his son’s computer, adding that he would be happy to put in a good word for me with my country manager at performance evaluation time. How should I handle the situation?

A Asking you to perform personal IT services and suggesting a favor in return are inappropriate uses of authority. If you feel comfortable in doing so, politely inform the manager of the rules concerning use of World Bank Group resources. You may also wish to send him a follow up note, explaining why you could not honor this request. If you are not comfortable in speaking with him directly, consult your country manager. You may also consult an RWA or Ombudsman.

Managers must consider the impact of power differences, and refrain from making personal requests, recognizing that some staff may not feel comfortable in declining a request.
**HARASSMENT**

Q Most of the time, my supervisor and I have a good relationship. But when under pressure, she shouts and personally berates me in front of my colleagues.

A Such behavior is disrespectful and could be considered harassment. You should speak with the supervisor and let her know the impact of this behavior. We all have bad days and can react to pressure, but this is not an acceptable excuse for disrespecting others. If it does not stop, you can seek guidance from a World Bank Group resource.

While bringing situations forward may be difficult, staff are encouraged to bring concerns to the attention of World Bank Group resources. Only in this way can necessary action be taken to prevent the creation of a hostile work environment.

**SEXUAL HARASSMENT**

Q I am a new consultant to a project. The project’s team leader invited me to dinner and told me, in explicit terms, how physically attracted he was to me. How should I respond?

A This is a difficult situation, as the team leader has influence over your assignment and provides feedback about you to your manager. However, you should still let the team leader know in clear and direct terms that his behavior is not welcome and should not continue. If unwanted advances continue or the team
leader behaves disrespectfully toward you, that behavior could constitute sexual harassment. You can register a complaint through the Office of Ethics and Business conduct (EBC) or contact the following resources:

**DISCRIMINATION**

Q I overheard a colleague calling someone a name with racist overtones. What should I do about it?

A If you are comfortable in doing so, you can speak with your colleague who used the racist term to sensitize him to the impact of his words, and encourage him to remedy the disrespectful treatment. You are also encouraged to offer moral support to the person who was called the name.

Upholding the Core Values means that you are encouraged to become involved, even though it may be easier to look the other way. Racial sensitivity is especially important in our multicultural environment, and is critical in our relationships with all stakeholders.

Staff must consider the impact of power differences in their interactions with key stakeholder groups, recognizing that some individuals may not feel comfortable raising concerns.
Vendors and contractors often work on World Bank Group premises, but they are subject to their own firms’ Codes of conduct. In their work with the World Bank Group, they are also expected to respect our Code of Conduct. The General Services Department (GSD) ensures that business conduct concerns relating to these stakeholders are appropriately managed.

DIVERSITY AND INCLUSION

Q I feel that those who share the same gender and nationality as my manager get promoted or have access to high visibility task forces and work assignments. I do not think that my opinions are ever taken into account. During my performance appraisal, my manager tells me that I am a good worker, but not assertive enough to advance to higher positions. I do not think this is a correct assessment and I do not feel that I am heard. What should I do?

A If you believe you are not being treated fairly, or that one group of colleagues is being favored, you should consult your HR manager. The World Bank Group values diversity and inclusion and believes strongly that all staff should have the opportunity to contribute their full potential to the mission of the organization. The World Bank Group will respond to such concerns and will examine performance and hiring data to determine whether there is a pattern of favoritism. Even if no discriminatory pattern is identified, the managers should be made aware of such perceptions by a supervisor or your HR
Professional. Managers are required to create an environment where all staff can succeed.

Only when staff bring concerns forward can the institution take steps to ensure that the Core Values are being upheld.

**WORK–LIFE BALANCE**

*Q* My manager is a workaholic. I live with aging parents and have young children, who make many demands on my time outside the office. I feel pressured to put in hours like my manager so that I can move ahead in my career. How should I handle this?

*A* Due to the nature of our work, staff periodically put in long hours. It is natural to feel pressure to work long hours to support your team, your manager, and the organization. However, the World Bank Group recognizes that a healthy balance between work and personal life will ultimately benefit both the institution and the individual. You and your manager should work together to achieve this. If you still feel pressured to work late because of your manager’s long hours, you should discuss this concern with him/her or your HR professional.
I am an administrative staff member in a country office. I help identify and evaluate hotels that meet World Bank Group criteria for official travel and also assist with visiting missions. I have received vouchers for all-expense-paid weekend stays at some of these hotels. Is it okay for me to use them or give them to others?

No. Using the vouchers or giving them to others would be a conflict of interest and is unacceptable. The travel industry often gives such gifts to those with decision-making powers in the hopes of generating referrals. Staff who are involved in procuring goods or services for the World Bank Group may not accept gifts of any value from vendors. It is best to politely return any such vouchers to the hotel with a note of explanation about the World Bank Group’s policy. If a stay at the hotel is necessary for professional reasons, the World Bank Group should pay the expense.

“There’s no such thing as a free lunch.”
– American expression

I work closely with a consultant, and would like to give her a wedding gift. Is this acceptable?

You must use your judgment when giving gifts to World Bank Group colleagues who are consultants or vendors. It can be very challenging to draw a clear line between personal and professional relationships.
If you are uncertain of the appropriate course of action—or of how the gift might be perceived by others—it is best to discuss the situation with your manager before giving the gift.

**MEDALS, DECORATIONS, AND HONORS**

**Q** Do I have to obtain permission to receive an honorary degree from my former university in recognition of my work?

**A** Yes. Prior approval should be received through EBC before accepting the degree. This is especially important with respect to honors that relate directly or indirectly to your professional work, as the perception can be created that staff are motivated or influenced by such outside recognition.

**Q** I am leaving the country, and was presented with an award in honor of my work. It was done in a public forum, and refusing it at the time would have caused embarrassment. What should I do?

**A** You should promptly share what happened with your manager and work with your manager to find a diplomatic way to return the award to the giver. In the future, it is best to be proactive and inquire whether there will be awards or medals given at such events, so that the other party is aware of the World Bank Group’s policy.
RELATIVES

I understand that the World Bank Group assesses different categories of relatives in different ways with respect to employment in the institution. I have a relative who has found a position at the International Finance Corporation (IFC) office in another country. Is this a problem?

Because of the inherent tension that exists between family and professional loyalties, “Category I” blood relatives such as parents, siblings, uncles/aunts, nieces/nephews may not work for the World Bank Group, either as individuals or through firms. (Aunts and uncles by marriage are not considered Category I close relatives.) Some (but not all) types of “Category II” relatives may work at the World Bank Group under certain conditions. Consult Staff Rule 4, paragraph 5.03, to see how this applies to your situation. If it is a Category I or II relative who has accepted employment, you must consult the HR Service Center. If you have any questions about how the policy applies to a specific relationship, consult EBC.

I work at headquarters. I have just found out that my father was offered a contract by the country office in my home country. What should I do?

Since your father is a “Category I” close relative, he is not eligible for World Bank Group employment, whether as an individual or through a firm, while you are also employed. We recommend that you advise your father of the Staff Rule that prohibits his hiring and contact the HR Service Center to disclose the matter. The employment
application form includes questions about relatives who work or who have sought to work at the World Bank Group.

Q

My daughter works for the World Bank Group’s restaurant contractor in London. Is this acceptable?

A

Yes, this is permissible provided that she is not working on World Bank Group–related business for the contractor, is not working in a Bank Group office, and is not an officer or owner of the firm. You may wish to consult EBC about your specific situation.

FINANCIAL INTERESTS

Q

I work in a unit that is investing in the private sector. I recently learned that my unit is investing in a firm in which my spouse is a partial owner. What should I do?

A

This is a real or apparent conflict-of-interest situation because your family may be personally benefitting from a World Bank Group investment. For the purposes of identifying conflicts of interest, a spouse’s investment is treated the same as your own personal investment. You must disclose it to EBC and your senior manager (director level or above), follow their guidance, and take prompt action to resolve the conflict. If you have any questions or need guidance, contact EBC.
**POLITICAL ACTIVITIES**

**Q.** I am posted to a country office and am interested in becoming personally involved in this country’s politics. May I participate in activities on my own time?

**A.** Because you are staff of an international organization, you must be aware of the perceptions created by your political involvement. For this reason, it is not permissible for you to become involved in political affairs when posted to a foreign country, with the exception of participating in local community affairs and peaceful demonstrations. You must strive at all times to be seen as politically impartial in the country where you work.

**Q.** I am a staff member based in Washington and would like to provide political advice, on an ad hoc and informal basis, to an opposition party leader in my home country. May I do so?

**A.** No. There is the risk that your personal advice could differ from the World Bank Group’s official position; your advice might appear in the press; or you may inadvertently divulge confidential information. Keep in mind that other parties such as journalists could identify your professional affiliation, even without your consent.
GOVERNMENT, PRIVATE SECTOR, AND CIVIL SOCIETY RELATIONSHIPS

Q I supervise a World Bank Group–financed project. My donor counterpart, a compatriot from my country, is new to this country. He recommended a company from our home country that he believes would be far more qualified than any local firm to receive the bid for the project, and encouraged me to be “patriotic” in supporting that firm. How should I handle this?

A The counterpart’s comments may reflect a genuine belief that the company is better qualified. However, the comments could also suggest an improper attempt to influence your judgment in favor of your country of origin. Advise the counterpart that the World Bank Group’s procurement process is governed by clear, strict, and verifiable procurement rules and that you may not take instructions from outside parties. Promptly discuss the situation with your manager, and review with specialized procurement staff whether any further action is needed. If you have concerns that corruption could affect the project, you should consult with the preventive services of the Integrity Vice Presidency (INT) on ways to help strengthen the process.

Q May I be self-employed or perform services for an external entity for compensation?

A As World Bank Group staff members, we owe our duty entirely to the World Bank Group. However, some limited outside employment may be allowed, with advance approval. The approval process depends on your grade level. If approval is given, keep in mind that when undertaking activities in a
private capacity, you cannot expose the World Bank Group to reputational risk, identify yourself as working for the World Bank Group, or use the institution’s supplies, services, information or facilities. Note that short-term staff members may do work for external entities, provided that the Institution’s resources are not involved and it does not otherwise create a conflict of interest with their work for the World Bank Group.

Please note that staff members in the United States on G-4 visas are prohibited by U.S. law from working in the U.S. except for the World Bank Group.

OUTSIDE ACTIVITIES

Q I am an economist. May I take leave without pay to accept a term appointment as the head of the central bank from my country?

A No. While employed with the World Bank Group, you may not accept a political or policymaking appointment. If you do accept such a position, you must resign from the World Bank Group.

Q I am a Senior Investment Officer, and would like to take external service without pay for one year to assist a firm in building its capacity. The firm does business with the World Bank Group. May I do so?

A Maybe. It will depend on the nature of the assignment, in particular whether there would
be any overlaps with the World Bank Group. You have an obligation to act in the interest of the World Bank Group, which remains your employer. If you have questions about this situation and the related rules, consult your manager and seek assistance from HR or EBC. Note that if the assignment is unrelated to the Bank Group, it may be possible to accept—but you should, nonetheless disclose the situation and seek guidance.

**BEFORE AND AFTER WORLD BANK GROUP EMPLOYMENT**

**Q** What cooling-off periods apply to various World Bank Group staff and vendors?

**A** The table below summarizes the cooling-off periods and where to seek authorization.

<table>
<thead>
<tr>
<th>TYPE</th>
<th>COOLING OFF PERIOD</th>
<th>WHO AUTHORIZES EXCEPTIONS</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dealings with previous employers</td>
<td>5 years</td>
<td>Senior manager, in consultation with EBC</td>
</tr>
<tr>
<td>Dealings with future employers</td>
<td>2 years</td>
<td>Senior manager, in consultation with EBC</td>
</tr>
<tr>
<td>Consultants or other staff who are owners, officers, board members, or have financial interest in a vendor firm</td>
<td>1 year after end of staff contract before firm is eligible for vendor status</td>
<td>No exceptions</td>
</tr>
<tr>
<td>Vendor/Contractor Upstream/Downstream</td>
<td>3 years</td>
<td>GSD Corporate Procurement</td>
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</table>
SUPERVISORY RELATIONSHIP

Q. Why is a private sexual relationship between a supervisor and a subordinate a problem if it is consensual?

A. A supervisor has authority over the employment decisions of a subordinate and cannot be objective if there is a sexual relationship. Therefore, this is considered a de facto conflict of interest. It doesn’t matter if the reporting relationship is direct or more distant. Should such a case arise, the more senior staff member of the pair has a duty to resolve the conflict, first by disclosing it to his or her own manager. That manager must consult HR and act promptly to resolve the conflict. Failure to do so could result in disciplinary measures.

BUSINESS CONFLICTS OF INTEREST

Q. How do conflict-of-interest issues arise within a World Bank Group organization? How do conflicts arise among the organizations?

A. Both inter and intra-organizational conflicts can arise in a number of ways. Some examples include:

- IDA has been offered donations by private corporations.
- IDA is providing advice on a project in which IFC Advisory is also involved.
- The Bank Group accepts roles both overseeing and carrying out partnership operations.

EBC can help staff resolve such concerns, or refer staff to the appropriate office for help.
USE OF WORLD BANK GROUP ASSETS

Q Whenever I need to find my colleague to go over our work project, it seems like she’s on a coffee break. She takes many coffee breaks a day. What can I do?

A We must use our time at work to focus primarily on World Bank Group business. Your colleague is not respecting the institution’s policies on working hours. If breaks are excessive and are leisurely in nature, such behavior is not appropriate and undermines morale. You should address your concerns to your colleague, if you are comfortable doing so, or to her manager or HR professional.

KICKBACKS, BRIBERY, AND FACILITATING PAYMENTS

Q During a meeting, I witnessed an Investment Officer working on a long-stalled project pass an envelope to a government official working on the project. The official thanked him and assured him that things would soon be moving forward. The Investment Officer explained to me that in this country the only way to get things done is to “grease the wheels.” What should I do?

A If the Investment Officer is paying the official to expedite a project, such a “facilitation payment” may be misconduct and a form of corruption. You have a duty to report your observations to your manager or INT. Although facilitation payments may be common in some cultures, the World Bank Group does not permit them.
A colleague with a strongly dissenting opinion shared my emailed analysis of a situation with a journalist friend. I did not intend for my views to be made public, as it is a controversial situation. What should I do?

You should promptly bring the situation to the attention of your manager. The colleague should have discussed her concerns with you, his/her own manager, or sought advice and guidance from other internal resources such as EBC. The colleague should not have shared internal documents with an external party without authorization. If the journalist refers to the email in a story, it could unduly expose you and other individuals to risk and could jeopardize the Bank Group’s reputation and ability to act as a neutral, honest broker.
PERSONAL LEGAL OBLIGATIONS

Q My former spouse, a staff member, refuses to make child support payments as has been mandated by the court. I have returned to my home country with the children, and my ex-spouse is in Washington. What can I do?

A Staff members are obligated to fulfill their personal legal obligations, such as paying child support. Upon receiving a copy of a court order issued by a competent legal authority, the World Bank Group will intervene to ensure compliance with this obligation. You should consult EBC for guidance.

DOMESTIC ABUSE

Q A colleague in my country office has confided in me that she is being domestically abused. What should I do?

A You should encourage your colleague to contact the Domestic Abuse (DA) Prevention Coordinator, which is also a resource for country office staff. If your colleague is unwilling to do so, you may submit an anonymous message to the DA Prevention Coordinator using the confidential form on the DA website. Alternatively, you can
encourage your colleague to seek assistance through the Health Services Department (HSD) Personal and Work Stress Counseling Unit, which can do direct counseling by phone and email. HSD and the Domestic Abuse Prevention Coordinator may also try to find local services to support World Bank Group country office staff.

Email daprevention@worldbank.org or see http://domesticabuse (worldbank.org/humanresources, then link to Domestic Abuse Prevention)

**Q**

From some phone conversations that I’ve overheard, I believe my manager or a colleague is abusing a family member. What should I do?

**A**

It is especially difficult to raise concerns about your manager, due to concerns about the impact of such an action on your—and his/her—career. You can contact the Domestic Abuse Prevention Coordinator either directly or by submitting an anonymous message using the confidential form on the Domestic Abuse Web site. You may also contact the Ethics Helpline.

**Q**

Beyond physical abuse or threats of physical harm, what else would be considered “domestic abuse”?

**A**

Examples of domestic abuse include:

- Emotional and verbal abuse
- Failure to pay court-ordered support
Imposing financial hardships on a spouse or domestic partner, such as failure to make mortgage payments or failure to pay court-ordered alimony and/or child support

Failure to provide copies of a passport, G4 visa, or I-94 to assist with the application or renewal of a dependent G4 visa or work authorization card in the United States

Failure to pay a spouse or domestic partner any amount reimbursed to a staff member or retiree by a World Bank Group medical insurance vendor for a medical claim, where the spouse or domestic partner paid the medical provider directly

Withholding any information mailed by a Bank Group medical insurance vendor that concerns a dependent, including but not limited to Explanations of Benefits.
<table>
<thead>
<tr>
<th>Abbreviation</th>
<th>Full Name</th>
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<tbody>
<tr>
<td>D&amp;I</td>
<td>Office of Diversity and Inclusion</td>
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<tr>
<td>EBC</td>
<td>Office of Ethics and Business Conduct</td>
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<tr>
<td>GSD</td>
<td>General Services Department</td>
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<tr>
<td>HR</td>
<td>Human Resources</td>
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<td>HSD</td>
<td>Health Services Department</td>
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<tr>
<td>HUB</td>
<td>Domestic Abuse Prevention Coordinator, The Hub, Domestic Abuse-related Resources</td>
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<tr>
<td>INT</td>
<td>Integrity Vice Presidency</td>
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<tr>
<td>ISG</td>
<td>Information Solutions Group</td>
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<tr>
<td>LEG</td>
<td>Legal Department</td>
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<td>MGR</td>
<td>Manager</td>
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<td>MEF</td>
<td>Mediation Services Office</td>
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<td>OMB</td>
<td>Ombuds Services</td>
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<tr>
<td>RWA</td>
<td>Respectful Workplace Advisors</td>
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