

RTI International Code of Conduct



RTI International Code of Conduct



Photos used throughout the RTI Code of Conduct were chosen to highlight RTI staff at work across a broad range of disciplines and locations, representing the global reach of our mission to improve the human condition.



Letter from the President and Chief Executive Officer



RTI President Wayne Holden speaks at an RTI open forum.

January 1, 2014

Dear Colleagues,

Over the past half century, RTI International has built a reputation for conducting rigorous, objective research and maintaining high ethical standards in our business practices. Upholding this hard-earned reputation is vital to our continued success and is a responsibility that each of us shares.

The RTI Code of Conduct outlines our standards of behavior and is designed to make perfectly clear our expectation that staff members always adhere to high ethical standards and business practices. These standards apply to everyone who works for RTI, whether you work in North Carolina or in one of our regional or international locations. Complying with the Code is a condition of employment at RTI; therefore, employees are required to acknowledge annually that they understand and will comply with it.

RTI's reputation and business depend on your understanding and adherence to our Code of Conduct. Whereas RTI's vision and mission define what we strive to achieve through our work, our Code of Conduct defines standards we must follow to reach this goal.

Sincerely,

A handwritten signature in black ink, appearing to read "E. Wayne Holden". The signature is stylized and includes a long horizontal line extending to the right.

E. Wayne Holden
President and Chief Executive Officer

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Introduction



1. Introduction

RTI International is one of the world's leading research institutes, dedicated to improving the human condition by turning knowledge into practice. Our staff of more than 3,700 provides research and technical services to governments and businesses in more than 75 countries in the areas of health and pharmaceuticals, education and training, surveys and statistics, advanced technology, international development, economic and social policy, energy and the environment, and laboratory testing and chemical analysis. In 1958, leaders in business, academia, and government in North Carolina founded RTI as the centerpiece of the Research Triangle Park.

RTI has always sought professional, competent people who will make good decisions in difficult situations. How we do business and how we treat others defines RTI to the rest of the world. As employees, we are expected to do more than comply with laws and regulations. We are expected to behave ethically, honestly, and with integrity in all of our business interactions. Ethics are standards of behavior that are guided by a set of shared values based on what is right and wrong. Behaving ethically means to behave according to these values and standards. Honesty and integrity form the foundation of RTI's reputation for excellence, which is important to protect, easy to lose, and difficult to regain.

Because RTI is a global organization in a complex world, it is not always easy to determine the best decision in every situation. Laws and business practices vary from country to country. For these reasons, our Code provides an ethical framework to guide our conduct based on RTI's values. The Code is intended to raise awareness about ethical issues, provide guidance, and prevent problems.

The Code is also meant to be a practical resource to help each of us do our jobs in an honest and ethical manner at all times. Please read it, refer to it often, and ask questions if something is not clear to you. For additional information about a specific part of the Code, check to see if there is a related policy or procedure, even if one is not specifically noted. It is important to understand that the Code does not substitute or replace in any way RTI's policies and procedures available on StaffNet or in your local country Employee Handbook or Manual. Rather, it supplements the guidance set forth there. Because RTI's policies and procedures are continually being reviewed, they are subject to change or modification at any time. Therefore, the policies and procedures will take precedence in the event they conflict with or are inconsistent with the Code.

Honesty and integrity form the foundation of RTI's reputation for excellence.



展望

成为世界领先的独立研究组织，因解决关键性社会和科学问题而受到认可。

使命

通过将知识转化为实践，改善人文状况。

价值观



诚信 我们实行个人与团体诚信的最高道德标准。我们与客户同仁公开、务实地沟通。



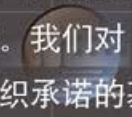
卓越 我们努力交付品质非凡、价值卓越的成果。



创新 我们在各类业务中鼓励多领域协作、创造力和独立思考。



尊重个人 我们公平、公正地对待彼此，互相尊重。我们相互支持，以全面挖掘自身潜力。



尊重 RTI 我们认识到 RTI 的优势在于我们作为整体以及作为个人对 RTI 的展望、使命、价值观、战略和实践的承诺。我们对 RTI 的承诺是所有其他组织承诺的基础。



财务职责 我们的财务操作具有诚实性和透明性。我们对成本竞争力及持续的财务负责。



客观性 我们的工作不受政治、经济或其他因素的不当影响。我们在工作中保持最严格的科学性和客观性。

2. Our Vision, Mission, and Values

Our Vision

To be the world's leading independent research organization, recognized for solving critical social and scientific problems.

Our Mission

To improve the human condition by turning knowledge into practice.

Our Values

Integrity

We perform with the highest ethical standards of individual and group honesty. We communicate openly and realistically with each other and our clients.

Excellence

We strive to deliver results with exceptional quality and value.

Innovation

We encourage multidisciplinary collaboration, creativity, and independent thinking in everything we do.

Respect for the Individual

We treat one another fairly, with dignity and equity. We support each other to develop to our full potential.

Respect for RTI

We recognize that the strength of RTI International lies in our commitment, collectively and individually, to RTI's vision, mission, values, strategies, and practices. Our commitment to the Institute is the foundation for all other organizational commitments.

Fiscal Responsibility

We operate with financial integrity and transparency. We are accountable for cost competitiveness and continuing financial responsibility.

Objectivity

Our work is independent of undue influences by political, economic, or other factors. We maintain the highest level of scientific objectivity in our work.

Posters outlining our mission, vision, and values were created in other languages for our international staff, including Mandarin, as shown at left.

Scope



3. Scope

Anyone who does business with or on behalf of RTI must comply with our Code of Conduct. This includes our employees, suppliers, and other partners worldwide. Other groups—our clients, customers, competitors, and the end users of our work—and those who interact with RTI also benefit from our Code of Conduct.

3.1. Responsibility and Accountability

RTI cannot be true to the principles in our Code without the help of every employee. We each are responsible for recognizing ethical issues, using the tools and guidance in the Code to think them through, and asking for advice whenever necessary.

No set of ethical standards can include everything or anticipate every situation. Our Code does not tell you how to behave in every specific situation. However, it is intended to provide general guidance to ensure that employees behave ethically at all times. You can use the model below to guide you in making ethical decisions.

Read the Code carefully. To continue working for RTI, you must respect and comply with the principles of this Code, as well as with RTI's policies and procedures. If you have any questions, or if you are ever uncertain about whether your activities or someone else's activities could violate the Code, you should seek guidance from your supervisor, your Human Resources partner, or RTI's Ethics Officer. If you are aware of a violation of the Code, you must report it to the RTI Ethics Officer.

3.2. Mandatory Disclosure Rule

As a government contractor, RTI is required by law to monitor, investigate, and disclose in a timely fashion, when detected, certain types of illegal or improper conduct in connection with the award, performance, or closeout of a contract. Specifically, the Federal Acquisition Regulation and agency rules require that RTI provide appropriate notices if we have credible evidence of a violation of federal criminal law involving fraud, conflict of interest, bribery or gratuities, or a violation of the U.S. False Claims Act. Significant overpayments must also be disclosed to the government. This means that if we bill a client incorrectly (for time worked, goods procured, or anything else), we need to ensure that we analyze what our responsibilities are to correct the mistake and make any necessary notifications. You should work with your supervisor, finance manager, or the RTI Ethics Officer to ensure that this incorrect bill is corrected. The failure to fully comply with this law can have serious adverse consequences for RTI, including fines, penalties, suspension, and debarment.

RTI staff members oversee projects around the world to improve services and infrastructure related to environmental health. [Photo: iStock]

Ethical Decision-Making Model

When you encounter an ethical issue, use the following steps as a guide:

1. Define the issue and identify possible solutions.
 2. Before you act, ask yourself the following questions:
 - Are the solutions legal?
 - Do the solutions comply with RTI's policies?
 - Which solution best supports RTI's values?
 - Would I feel comfortable seeing my actions reported in a newspaper?
 3. Based on your answers to the questions above, select the best solution. If you aren't sure how to approach the situation, please contact your supervisor or RTI's Ethics Officer for guidance.
-

RTI cannot be true to the principles in our Code of Conduct without the help of every employee.

3.3. False Claims Act/False Statements

Under the U.S. False Claims Act, it is a felony to make a false claim or statement to the government. It is RTI's policy to maintain our values of honesty and integrity in all dealings, and all employees are required to comply with company policy and federal law in not making any false claims or statements to the government. The contracting process presents risks of fraud. Therefore, employees must be alert and proactive in adhering to RTI policy and values, including, but not limited to, the following:

- Ensuring the integrity of accounting and records, including that all data are accurate and estimates are made in good faith. This includes charging all material and labor costs accurately and not misrepresenting expenses.
- Ensuring that no unallowable costs were included in reported amounts.
- Complying with all required disclosures and representations.

3.4. Reporting Violations

Why Is It Important to Report Possible Misconduct?

Unethical conduct by employees, contractors, partners, or suppliers weakens RTI's integrity and reputation, as well as our ability to do important work all over the world. When we commit to working for RTI, we commit ourselves to maintaining RTI's integrity. If we are aware of conduct that might violate our Code or that could violate the law, we are responsible for reporting the situation to the RTI Ethics Officer. You can make a report anonymously through the Ethics Helpline or confidentially by e-mailing Ethics@RTI.org.

For more information, see Policy 1.2.2, Ethics Helpline, and Policy 1.29, Fraud Reporting and Prevention.

Will RTI Keep My Report Anonymous and Confidential?

The RTI Ethics Officer will keep all information anonymous or confidential to the extent practicable. In some circumstances, expertise from areas such as Human Resources, internal audit, corporate counsel, or management



A project team inspects constructed wetlands in Ritu, Delhi, India, designed to filter out surface contaminants and silt that otherwise would discharge directly into nearby bodies of water. [Photo: RTI project staff]

may be needed for an investigation.

Will RTI Protect Me from Retaliation?

RTI does not allow retaliation (acts of revenge, “getting even,” or “payback”) against any employee for reporting a suspected violation or for participating in an ethics investigation. Employees, regardless of seniority or status, who take part in retaliatory activities will be subject to disciplinary action and could lose their jobs.

For more information, see Policy 4.10, Protection of Whistleblowers, and Policy 4.3, Prohibition and Prevention of Harassment, Discrimination, and Retaliation.

What Happens if Someone Knowingly Submits a False Report?

RTI will take great care to protect persons from false accusations. Employees who knowingly submit false reports will be subject to disciplinary action and could lose their jobs.

Will There Be an Investigation? What Can I Expect?

The RTI Ethics Officer (or his/her designee) will promptly and fairly investigate all reports about possible violations of the Code. The rights of all persons who are affected by the violation and investigation will be respected during investigations. The RTI Ethics Officer will coordinate the investigation with the appropriate RTI personnel and will take great care to respect the confidentiality of all persons involved in the investigation to the greatest extent possible.

Individuals who are aware of possible violations should not carry out their own investigations. Report all suspected violations to the RTI Ethics Officer. Investigations can involve complex legal issues, and if we act on our own, we might negatively affect the integrity of an investigation and negatively affect ourselves and RTI. But we must act quickly to preserve documents and other items that are important to the investigation. It is a violation of RTI’s policy to cover up an offense or to change or destroy evidence.

Employees are expected to cooperate fully with the investigation of any supposed violation and to answer questions truthfully and to the best of their ability. If the result of the investigation proves that action is required, RTI will take steps to correct the problem and prevent it from happening again.

Failure to cooperate with an investigation may subject you to disciplinary action, up to and including termination.

What Are the Consequences of Violations?

Depending on the type of violation, RTI can take actions that range from verbal warnings to termination of employment. In addition, the type of violation could result in criminal or civil penalties. In more severe circumstances, final decisions about the appropriate action will be made by RTI’s President in consultation with the RTI Ethics Officer and appropriate RTI management personnel.

When we commit to working for RTI, we commit ourselves to maintaining RTI’s integrity.

RTI provides data in support of national air quality monitoring networks to inform federal regulations in the United States.



Workplace Environment and Behavior



4. Workplace Environment and Behavior

RTI is a diverse organization that brings together men and women from many nationalities, races, religions, and political backgrounds from all over the world. Our shared commitment to our mission of improving the human condition begins by treating other people with respect. This means that we

- Listen attentively to other people;
- Are considerate of other people's wishes;
- Communicate and act politely and honestly with and toward other people;
- Do not spread mean-spirited or hurtful information about other people;
- Do not display pictures in work areas that could be offensive to other people;
- Do not disclose confidential information;
- Are sensitive to cultural differences; and
- Appreciate and learn from the unique experiences and perspectives each individual brings to RTI.

Q. I am a devout Muslim, and I began wearing the hijab two years ago. Will RTI respect my right to express my faith in this way?

A. Yes. RTI's values say that all employees must respect the dignity of every individual. If you feel that someone is acting disrespectfully toward you because of your expression of faith, or for any other reason, please contact your supervisor, Human Resources, or the RTI Ethics Officer immediately.

4.1. Public Expression and Statements of Opinion to Outside Organizations and Individuals

As informed citizens, we have the right to express our opinions as individuals about issues at the local, state/province, or national level. As long as we clearly state that we are representing ourselves, and not RTI, we may express our opinions to elected or appointed officials, legislative body representatives, the media, or representatives of private industry.

We must be sure to keep our individual opinions strictly separate from, and not attributed to, RTI. It is also important that our statements are not misunderstood as a criticism of our clients. Check with RTI's Office of Public Relations & Corporate Communications if you are unsure about what statements you may make to outside organizations and the media.

In all staff and client interactions—whether in person, by telephone, or through other information technology—we demonstrate respect for others.

Our shared commitment to our mission of improving the human condition begins by treating other people with respect.

Q. My country has recently transitioned to democracy. This is a very exciting and hopeful time for us, and I am actively involved in helping my community participate in government decisions. Since I do not have e-mail at home, is it okay to use RTI's e-mail to inform friends about an upcoming political event?

A. No. Employees should not use their RTI e-mail accounts for political expression. Any political activities must be carried out during your personal time and from your non-RTI e-mail address.

If you are asked to express professional opinions in the media, it is especially important to keep your opinions separate from RTI's official statements. When an individual is well qualified, and when conclusions are based directly on non-confidential results of research conducted at RTI, it may be appropriate to identify yourself as an RTI employee. You must discuss all such expressions in advance with RTI's Office of Public Relations & Corporate Communications.

4.2. Fair Hiring Practices/Equal Employment Opportunity

Each employee brings many different skills and experiences to RTI. These differences are important to our ability to respond to complex problems around the world. We treat all employees and job applicants fairly and objectively. We evaluate people based on their skills and job performance, not on their race, skin color, religion, creed, sex, pregnancy, age, marital status, sexual orientation, national origin, disability, veteran status, citizenship status, or any other classification protected by applicable discrimination laws or RTI policy. Family members of employees can be hired by RTI, but only if the family member is the most qualified applicant for the position (and, as explained in Section 8, Conflicts of Interest, the family member would not report to, or directly supervise, his or her relative).

For more information, see Policy 4.1, Equal Employment Opportunity.



Employees are hired based on their skills and experiences and are encouraged to share them.

4.3. Harassment and Workplace Violence

We are committed to maintaining a work environment that is without violence, threats of violence, physical or verbal abuse, harassment, intimidation, and other disruptive behavior. All RTI employees have a duty to avoid such behavior, and we expect our partners, customers, and suppliers to do the same.

If you have experienced harassment at RTI, or if you have seen anyone behave in a way that creates a hostile work environment for someone else, report the situation to Human Resources or the RTI Ethics Officer immediately.

Harassment takes many forms and has different meanings around the world. Its basic meaning is a lack of respect for another person's dignity. RTI will not tolerate harassment in any form, including, but not limited to

- Unwelcome sexual suggestions or comments, requests for sexual services, and other types of verbal, nonverbal (e.g., noises, gestures), and physical conduct that is sexual in nature;
- Discriminatory or sexually suggestive posters, screensavers, photographs, or other displays;
- Threatening or intimidating behavior;
- Abusive language;
- Comments or jokes that make others feel uncomfortable;
- An offensive or disrespectful tone of voice; and
- Any other conduct that creates a hostile work environment or offends another person's dignity.

In some countries, other behaviors (in addition to the ones listed) could be considered as harassment or disrespectful. These could include standing too close to another person, pointing a finger at him or her, or using a loud tone of voice. You are responsible for being sensitive to cultural differences in the countries where you work.

Q. I like to tell jokes about different religions, including my own. Is this okay?

A. No. Most people appreciate a good laugh—but not if it will offend another person. Because different people are offended by different things, do not make jokes about religion or other sensitive topics.

Q. At my last job for another employer, my supervisor asked me several times if I wanted to have a drink with him after work. It was clear that his intention was to pursue a romantic relationship with me. His suggestions made me very uncomfortable. I refused his offers each time. As a result, I received bad performance reviews and had to leave my job. What should I do if this happens at RTI?

A. We do not tolerate sexual harassment. If it occurs, you should contact Human Resources or the RTI Ethics Officer immediately.

For more information see Policy 4.3, Prohibition and Prevention of Harassment, Discrimination, and Retaliation.

We are committed to maintaining a work environment that is without violence, threats of violence, physical or verbal abuse, harassment, intimidation, and other disruptive behavior.

4.4. Workplace Health, Safety, and Security

All employees have a duty to protect themselves and their coworkers by identifying and preventing potential dangers in the workplace and by following company guidelines for reporting workplace injuries or safety violations.

For more information about workplace health or safety, see Policy 12.1, Safety, Health, and Environment, or contact RTI's Office of Environment, Health & Safety.

Employees are also required to follow the security requirements for their specific work locations. If you have workplace security concerns, or for more information about security, please contact Corporate Security & Safety.

For more information, see Policy 12.1, Safety, Health and Environment.

4.5. Using Mobile Devices and Texting While Driving

Because the safety of employees and other individuals is of the utmost importance at RTI, employees are required to be familiar with and comply with local laws and company policies with respect to the use of mobile devices while operating a motor vehicle for business purposes. While on RTI property or on RTI business, do not use cell phones (including hands-free devices) or any other mobile electronic devices while operating a motor vehicle. If you need to make or answer a phone call or use your mobile device, safely pull over to the side of the road or to another location before doing so.

For more information, see Policy 12.4.5, Vehicle Operation.

4.6. Confidentiality of Employee Information

RTI is committed to keeping the confidentiality of every employee's personal information. We limit access to your information and use it only for legitimate business purposes, such as the administration of human resources or benefits programs.



Fekadu Moreda, Katherine Heller, and Jay Rineer confer over maps of critical watersheds for a project helping Latin American countries respond to climate change.

4.7. Drug- and Alcohol-Free Workplace

To do our best work as an organization and to protect RTI's reputation, employees must not come to work, or operate company vehicles, when they are under the influence of alcohol, illegal drugs, narcotics, or other unlawful substances. RTI's Employee Assistance Program provides services to help employees with alcohol or drug abuse problems.

For more information, see Policy 4.5, Drug- and Alcohol-Free Workplace.

Q. I am travelling to the field for business. After work hours, may I go to the hotel bar and have a few drinks?

A. Yes. However, you are expected to use good judgment, comply with applicable local laws, and remember that your actions send messages to others about yourself and about RTI. In some countries, it may be inappropriate, offensive, or illegal to drink alcohol, and we should be respectful and aware of the cultural values and laws of the countries in which we work.

4.8. Integrity

Honesty and integrity are important values here at RTI. As such, employees are required to ensure that any and all resumes and references provided to RTI and to potential clients as part of the proposal process contain no falsities, misrepresentations, material omissions, or embellishments. It is the employee's responsibility to ensure these materials are accurate and not misleading. If you suspect that a resume or reference you have provided is false or potentially misleading, you should immediately contact Human Resources.

4.9. Social Media

Social media is quickly becoming a primary tool for spreading information and, as such, has the potential to affect our reputation, business, and your fellow employees. RTI employees who participate in social media are personally responsible for the information they share and are expected to use good judgment and conduct themselves professionally at all times, in accordance with the RTI Code of Conduct and RTI's Policies & Procedures.

For more information, see Policy 1.28, Use of Social Media.

RTI employees who participate in social media are personally responsible for the information they share and are expected to use good judgment and conduct themselves professionally at all times.

RTI researchers conduct policy evaluations using advanced tools to inform decision making and ultimately contribute to sounder policies that improve the world.



Legal Compliance



5. Legal Compliance

5.1. Classified Information

RTI is committed to preserving the integrity and security of classified information in its possession. As a government contractor, RTI is required to follow federal laws regarding the protection and disclosure of classified information. Information deemed classified should be handled carefully and only disclosed or retained strictly according to federal law and RTI policy. No employee should accept or solicit classified information if there is reason to believe that the release was not authorized.

5.2. Export Controls

RTI employees must comply with trade laws and regulations before exporting goods, data, or information. An export is defined as the actual shipment of a commodity out of the United States as well as any transfer of U.S. information, including software source code, technical data, and services, from a U.S. person to a non-U.S. person anywhere in the world. Exports of technical data to non-U.S. persons may occur in the United States or elsewhere and may be visual, oral, or in writing. For these reasons, you must use great care when handling all types of oral and written communication, including telephone conversations, e-mails, faxes, presentations, and tours, and when you are hosting or escorting foreign visitors. Employees with access to export-controlled technology or information must be familiar with applicable export control policies, regulations, and laws and must ensure that all export control requirements have been fulfilled before exporting any items. Any questions should be directed to the RTI Export Compliance Officer or the Vice President of Corporate Compliance.

For more information, see Policy 1.19, Export Compliance: Licensing, and Control; Policy 1.20, Export Control: Marketing; and Policy 11.2.1, Restricted Access Buildings and Zones.

Q. Do I have to determine whether I need an export license before I can speak with a non-U.S. citizen about a technology that might be restricted if that person is an RTI employee?

A. Yes. Before communicating—visually, orally, or in writing—with any non-U.S. national about items or information that might be regulated by export control laws, you must determine if an export license is required, even if the individual is an RTI employee. Please seek guidance from the RTI Export Compliance Officer.

Below: In South Africa, the Integrated Education Program provided training to teachers to improve reading instruction. [Photo: IEP team]



Left: Children from a school participating in the USAID Primary Math and Reading Initiative in Kenya were visited by RTI Executive Vice President Aaron Williams. [Photo: Alex Kamweru]

Making the Ethical Choice

I work on a project studying human health. The client has instructed RTI to ship project materials to a country currently under a comprehensive trade and investment embargo. After consulting with RTI export compliance, I inform the client that without a license, this shipment could constitute a violation of U.S. sanctions. The client cancels the shipment. They quickly replace that shipment with a similar one to a neighboring country. Recognizing that this shipment is likely to be bound for the embargoed destination, we respectfully remind the client this could constitute an illegal diversion and refuse to conduct the shipment.

5.3. Knowing Your Customer and Prohibited Contractual Relationships

Sound business practices and federal laws require that RTI conduct reasonable due diligence on the end-user of its goods and services. Furthermore, RTI shall not knowingly employ an individual or enter into a contract with a company, by any means, if the individual or company is on the General Services Administration's Consolidated List of Debarred, Suspended, and Ineligible Contractors, or knowingly employ an individual who has been convicted of an offense related to government contracting. RTI will also not knowingly contract with an individual or entity identified on the Office of Foreign Asset Control's Specifically Designated Nationals and Blocked Persons list of individuals who are subject to trade restrictions. If you learn that a particular employee, consultant, or other individual or entity with whom RTI contracts appears on either of these lists, you should immediately sever business connections with that individual or entity and contact the RTI Ethics Officer.

5.4. Human Trafficking and Commercial Sex Workers

RTI is committed to protecting human rights. Therefore, all employees have a duty to carry out operations in a manner that shows the highest respect for individual human rights. As a government contractor, RTI is committed to complying with the U.S. government's zero-tolerance policy prohibiting government contractors and contractor employees from engaging in or supporting trafficking in persons, procurement of commercial sex acts, or use of forced labor. It is RTI's specific policy that neither RTI, nor any of its employees, shall engage in, support, or promote any of these activities in any country in which we do business. Any such activities, even if legal in the country in which the activities are performed or procured, are a violation of this U.S. law and can have significant consequences for your employment, your project, and RTI as a whole.

For more information, see Policy 1.23, Prohibition of Human Trafficking.



*USAID funded Girls' Improved Learning Outcomes in Egypt.
[photo: Infonex]*

5.5. Lobbying Activities

As individual citizens, RTI employees may communicate with members of Congress and the Executive Branch at any time provided RTI resources are never used to support these personal political activities. However, when communicating on issues related to RTI, it is essential to coordinate with RTI's Office of Government Relations. This is important both to ensure consistency among all messages perceived as being "from RTI," to ensure compliance with federal law, and because the Office may already be working on certain issues. As a nonprofit corporation, RTI is subject to restrictions on certain political activity imposed by federal law, including the kinds and amount of lobbying or communication that RTI and its employees may engage in. All employees who are considering communicating on a political issue related to RTI, on RTI's behalf, or with a government employee, must contact RTI's Office of Government Relations prior to engaging in the communication, even if the communication is intended to be strictly internal to RTI.

5.6. Antitrust, Anticompetitive Practices and Boycott Requests

RTI does not participate in anticompetitive discussions with our competitors to try to fix prices or manipulate the marketplace in order to gain an unfair advantage. Such conduct is unethical and violates antitrust laws in the United States and elsewhere. RTI employees should not be involved in agreements or discussions with anyone seeking RTI's cooperation to boycott or refuse to do business with persons or groups in other countries. If this occurs, you must disclose these discussions, because RTI has an obligation to report them to the U.S. government. Please contact the RTI Office of Corporate Counsel to report these discussions.

For more information, see Policy 3.6, Compliance with Antiboycott Laws.

Sarah Pouezevara leading a workshop of local stakeholders and experts to adapt the Early Grade Reading Assessment instrument to the Philippines context.





RTI International

RTI
INTERNATIONAL

Patients as Partners in Care
Engaging Patients Through Health IT

April 14, 2011
National Press Club
Washington, DC

6. Anticorruption

6.1. Procurement Integrity

Procurement integrity means that RTI bids fairly and ethically on potential work and we ensure that all statements, communications, and representations to potential clients or customers are accurate and truthful. When contracts are awarded, we must comply with all specifications, requirements, and clauses.

As a federal contractor, we must abide by a set of rules developed to help contractors and federal employees avoid ethical misconduct or appearance of ethical misconduct. The principle of procurement integrity encompasses a range of legislation, regulations, and directives and was established to preserve the integrity of federal procurements. The Procurement Integrity Act bans the disclosure of procurement information, bans obtaining procurement information, requires federal employees to report employment contacts by and with competing contractors, and invokes a one-year ban for certain personnel accepting compensation from a contractor. Violations of these rules can result in criminal and civil penalties for both RTI and the individual involved.

Employees are not permitted to seek or receive information about potential government or commercial business that RTI is not authorized to have. For example, we are not allowed to access nonpublic documents that relate to procurement planning, request for proposals (RFPs) information on funding availability, or acquisition plans. Seeking or receiving proprietary data, including pricing information for other competitors, is also not allowed.

Q. During a recent proposal bid, our government customer mistakenly sent us information about our competitor's prices. What is the proper thing to do in this situation?

A. To act with procurement integrity means that you quickly call your government customers to inform them of mistakes, and you return the information to them without giving it to anyone else. This action will ensure that all competitors are treated fairly, and it will protect RTI from accusations of acting improperly. If you do not tell the government about what happened, your actions could result in serious penalties for RTI and could damage our reputation for integrity and open communication with our clients. If you learn confidential information, please contact RTI's Ethics Officer to discuss the appropriate next steps.

Q. The RFP for a new project was just made public. Can I talk to one of my contacts from that government agency to ask her questions about the new project?

A. No. Once the RFP has been made public, you can ask questions only through the Contracts Officer at that agency.

Left: RTI held a policy forum at the National Press Club in Washington, DC.



How do we define “government officials”?

- Officials, employees, and agents of the executive, legislative, and judicial branches of national, regional, and local governments
- Candidates for a political office and officials of political parties
- Military or law enforcement personnel
- Officers of commercial businesses or other enterprises that are owned or controlled by national, regional, or local governments

Stephen Beaulieu leads a team that conducts health, food safety, and environmental risk assessment for federal, commercial, and international projects.



6.2. FCPA/UK Bribery Act

Because RTI performs business in many countries around the world, we are also required to comply with several laws that prohibit certain improper international business practices, including engaging in or failing to prevent bribery. The U.S. Foreign Corrupt Practices Act of 1977 (FCPA) is a criminal statute that prohibits U.S. companies, such as RTI, and their subsidiaries, business divisions, employees, agents, and representatives from bribing “foreign officials” to obtain or retain business and requires that they follow certain accounting requirements. The UK’s Bribery Act 2010 imposes strict measures for companies procuring or failing to prevent a bribe on their behalf; it also applies to the bribing of employees of private organizations. These laws apply regardless of where the activity is taking place and must be complied with regardless of where employees are operating. Employees must comply with RTI’s zero tolerance policy for bribery in all transactions and business dealings in all countries in which RTI operates.

For more information, see Policy 1.24, Foreign Corrupt Practices Act: Due Diligence and Compliance.

6.3. Relations with Government Officials

You must interact differently with government officials (whether they are U.S. government officials or government officials from another country) than you interact with nongovernmental persons or groups. More detailed information is contained in RTI’s Conflicts of Interest policy and its procurement policies, but the following guidelines can help us recognize important ethical situations when interacting with government officials and will help us resolve these situations according to RTI’s values and policies.

Gifts and Gratuities to U.S. Government Officials

Providing anything that has a monetary value, such as food, travel, entertainment, discounts, or loans, to a government employee or official is normally prohibited. Modest food and refreshments that are not offered as part of a meal may be provided. Never provide anything of value to a government employee that could cause the integrity of the procurement process to be questioned. Under certain circumstances approval may be provided. For more information, contact the RTI Ethics Officer for guidance.

Payments to Government Officials

All RTI employees, contractors, and anyone else acting on RTI’s behalf worldwide must comply with the FCPA. The FCPA does not allow anyone to make a payment or offer anything of value (directly or indirectly through an agent or other intermediary) to a foreign government official, party official, or political candidate to try to influence the official or his or her government to act in a way that provides an advantage to a

person or group. Because the actions of a third party acting as an agent, representative, or consultant of RTI can expose RTI to liability under the FCPA, great care must be taken in the retention of such persons.

Those RTI employees who work with foreign representatives must carefully review Policy 1.24, Foreign Corrupt Practices Act: Due Diligence and Compliance.

Improper or Illegal Gifts

Business courtesies or entertainment that might be appropriate when interacting with nongovernmental persons or groups, such as paying for lunch or dinner, are usually not appropriate or legal when interacting with government officials, whether they are in the United States or elsewhere. Do not offer anything to government officials or accept anything from government officials if it is worth more than a minor value. If you have a question about whether something can be offered to, or received from, a government official, contact the RTI Ethics Officer.

Q. During negotiations with a government client, we offered refreshments, such as bottled water, coffee, fruit, and soft drinks. Was this improper?

A. No. Offering small refreshments like these is allowed if it was done during the course of business and is only done occasionally. Please note that RTI's policy does not allow the furnishing of meals to U.S. government officials.

RTI knows that in some parts of the world it is usual to offer money, special treatment, or something of value to government officials (whose salaries might be very low). But we will not do business this way. If you are asked for money, special treatment, or anything else of value by a government official to influence an official decision, either directly or through someone else, you must decline the offer and report it immediately to the RTI Ethics Officer.

Engaging Current or Former U.S. or Non-U.S. Government Employees

RTI's Ethics Officer must provide written approval before RTI can approach a current government employee of any government worldwide about working as an RTI employee or consultant. Offers to hire government employees could be seen as trying to influence a government official to take an action that would give RTI an unfair advantage. These offers could be viewed as making a bribe or offering a kickback. In addition, RTI must comply with several U.S. laws relative to engaging former federal government employees.

Care must also be exercised when considering the hire of former government employees, in that their employment may impact their ability to legally perform certain job duties for RTI or may subject RTI to criminal and civil violations. Contact the RTI Ethics Officer in advance of engaging a former or current government employee as an employee, consultant, or contingent worker

Making the Ethical Choice

I work on a project to reform national education. The success of our project partly depends on positive relations with government officials. At the beginning of the project, officials from the Ministry of Education asked me repeatedly for a contribution of money. Each time, I firmly told them, "No, I cannot do it." They even said they would give my contribution to charity. I said, "I am sorry—I still cannot do it."

Information and Assets



7. RTI and Third-Party Information and Assets

7.1. Insider Trading/Using Nonpublic Information

Insider trading happens when information that is available only to insiders is used illegally to make a profit in financial trading. We must act with integrity when using nonpublic information about RTI, our customers, our suppliers, and our collaborators—both at work and during personal time. Using nonpublic information for personal profit is a violation of our Code of Conduct as well as U.S. laws and most foreign securities laws. This means that we are not allowed to use nonpublic information to trade, buy, or sell stock or other securities, and we cannot share nonpublic information to enable others to do so.

7.2. RTI and Customer Assets

The hard work and investment of many different groups—employees, customers, suppliers, subcontractors, and others—have provided RTI with facilities, equipment, materials, property, and other assets. These assets are intended to promote the many interests of RTI. We have a shared duty to protect all property, sensitive information, tools, and equipment that are entrusted to us.

7.3. Use of Communication Tools

RTI complies with all applicable legal requirements about privacy in the workplace. To keep our commitment to our shared values, RTI has the right to monitor and record all computer activity and to block offensive, illegal, and non-business-related sites or communications.

Q. I spend a lot of time on the computer at work. Is it acceptable to use the Internet occasionally for personal reasons?

A. Yes. RTI recognizes that e-mail and the Internet, like the telephone, are important communication tools and that they are occasionally used for personal matters. However, we expect that employees will comply with our values during these communications by treating others with respect. The use of the Internet or e-mail to access, store, view, or transmit pornography or other offensive material is not allowed. Furthermore, when participating in social media (e.g., Facebook, Twitter, chat rooms, blogs, and e-mail), take steps to avoid any appearance that you are speaking on behalf of RTI.

We have a shared duty to protect all property, sensitive information, tools, and equipment that are entrusted to us.

Left: Eileen Reynolds and Bagus Arifki from the Association of Southeastern Nations (ASEAN) train ASEAN staff on using the new ASEAN Member Services website. [Photo: Pablo Torres]

7.4. Proprietary Information/Sensitive Information

Proprietary information is business, financial, technical, and other confidential data about or owned by a company.

For more information, see Policy 12.5, Protection of Sensitive Information.

Q. Can you give specific examples of information that RTI considers proprietary and that we should be careful to protect and not to provide to outsiders?

A. Examples of proprietary information include RTI pricing policies, business plans, strategic plans, client information, cost proposals, technical proposals, project budgets, technical information, technical results, survey data, research findings, employee information, and similar information entrusted to RTI by other persons or groups, including clients, partners, and suppliers.

RTI researchers designed a prototype of a personal health record application that could encourage sedentary adults to become more active and reduce health risks.



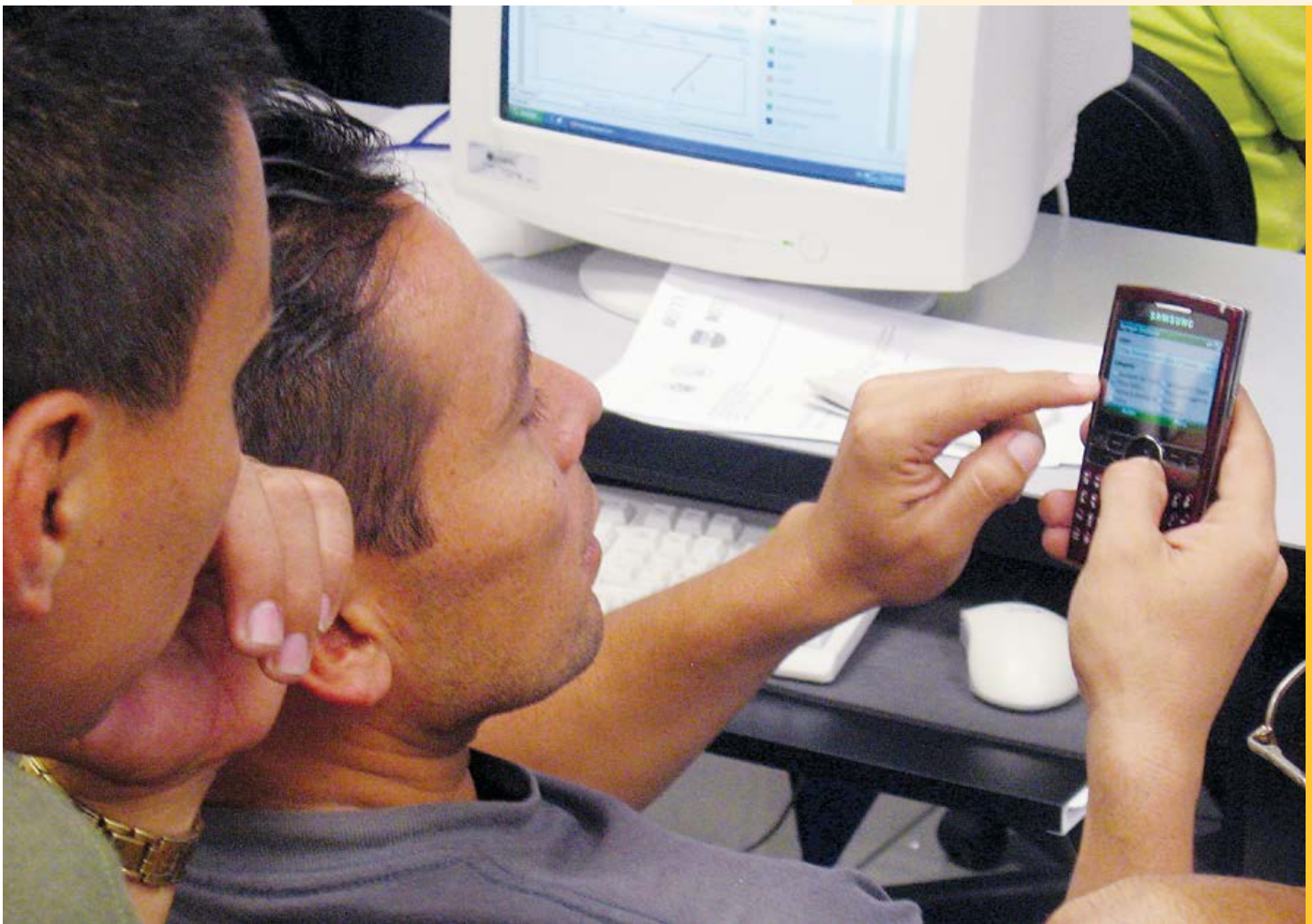
7.5. Intellectual Property

Intellectual property is the term used for people's unique ideas, inventions, discoveries, or processes. The four main types of intellectual property are patents, copyrights, trademarks, and trade secrets.

RTI employees can create valuable assets, such as intellectual property, while carrying out research activities. All intellectual property that is created or first produced by RTI employees is the sole property of RTI, unless a contract between research sponsors and RTI specifically says that the intellectual property will belong to someone else. RTI employees are responsible for informing their supervisors and RTI's Office of General Counsel of any inventions or discoveries as soon as practicable.

For more information, see Policy 1.10, Intellectual Property, and Policy 1.25, Laboratory Notebooks.

RTI is a partner on the Seguridad Inalámbrica project, which uses Qualcomm 3G technology to enable law enforcement and municipal government personnel to increase public safety through the mapping and sharing of information on crimes as they occur.



Conflicts of Interest



8. Conflicts of Interest

To comply with RTI's values, we make fair and objective decisions that are in RTI's best interest. A conflict of interest occurs when an employee's personal interests (or the interests of other companies, persons, or groups) conflict with RTI's interests as an organization. RTI's interests include the ability to accomplish our mission and vision, to be true to our values, and to meet our responsibilities to our clients.

The following principles, as outlined in detail in Policy 1.4, Conflicts of Interest, should guide our conduct when possible conflicts of interest occur:

- We do not allow our personal interests to negatively affect, or appear to negatively affect, our loyalty and dedication to RTI's best interests.
- We bring possible conflicts of interest to the attention of the RTI Ethics Officer and seek advice before doing anything that could interfere, or appear to interfere, with our ability to fulfill our duties to RTI.

It is impossible to describe every situation where a conflict of interest might emerge, but the following are examples of when a conflict is most likely to occur. If you think you could have a conflict of interest, you should talk to the RTI Ethics Officer.

8.1. Gifts and Entertainment

Business gifts and entertainment can promote understanding and goodwill. In some cultures, gifts and entertainment play an important role in business relationships, but they can be a problem if they negatively affect our ability to make objective and fair business decisions. In addition, in certain circumstances, any gift may be improper (for example, interactions by procurement employees with suppliers and any interactions with government officials). No gifts or payments may be made directly or indirectly to obtain favorable action by a government agency.

For more information, see Policy 1.4.2, Gifts and Entertainment, or ask the RTI Ethics Officer.

Q. In my culture, we are expected to give nice gifts to important customers on holidays. I do not want to offend or risk losing a customer. What should I do?

A. RTI policy allows you to give inexpensive gifts, such as candy, fruit, or other small holiday items. You should not give a gift that could create the impression that RTI might be trying to influence a person or group to give RTI special treatment. This could damage RTI's reputation for fairness. If you believe that a situation requires an exception to RTI's gift policy, discuss it with your supervisor. If your supervisor agrees, he or she must write to RTI's Ethics Officer to explain the action before you give the gift. The RTI Ethics Officer will then make a final decision.

Left: The RTI-led USAID Multisector Alliances Program supports organizations in Nicaragua, Guatemala, and El Salvador that provide services in HIV/AIDS, education, and health, such as maternal and child care. [Photo: José Luis Samayoa]

Making the Ethical Choice

A community that had greatly benefited from RTI's services wanted to offer me a high honor. It was a problem for me personally and for RTI because if I accepted the honor, the members of the community would expect me to give them special treatment in the future. (I am a member of a grant review committee that makes grant decisions that could involve this community.) Although it was unusual for anyone to refuse such an honor, I met with the senior people in the community and told them how much I appreciated the gesture but that their expectations would conflict with my ability to do my work for RTI. In the end, they were very kind about understanding that I could not accept the honor.

Making the Ethical Choice

I work in a country where unemployment is high, and the success of our project primarily depends on government support. An important government official expected me to hire his longtime friend for an open position on RTI's project. His friend was not the best qualified person for this position. I was polite and accepted his friend's application in person. Then I put it with the other applications that would go through a fair evaluation. I explained to him that RTI does not give special treatment when we hire because it weakens the system of equal opportunity that we are working to create in that country.

8.2. Relationships with Suppliers

When dealing with or making decisions affecting suppliers, you are expected to act fairly, objectively, and in RTI's best interest at all times. In practice, this means you will not accept or solicit any benefit from a supplier or potential supplier that might compromise, or even appear to compromise, your objective assessment of the supplier's product and price. Accepting special treatment, bribes, or kickbacks from suppliers is illegal. Kickbacks occur when a vendor takes a part of the purchase price and returns it to the individual facilitating the purchase (for example, a hotel giving an employee some money in exchange for that employee scheduling a conference at the hotel).

For more information, see Policy 1.4.3, Purchasing and Supplier Relations.

Q. A supplier asked me to consult for his company outside of my RTI job. Is this acceptable?

A. No. Even if you do not make decisions that affect suppliers, other people might see your actions as trying to influence the selection of a supplier. Your actions could create the impression that RTI is more willing to use this particular supplier. RTI must treat all suppliers equally and fairly.

Q. Suppliers in my country like to thank us by offering a small commission. Since we always choose the supplier with the highest quality for the lowest price, and the commission is already included in the price, can we accept the commission?

A. No. The commission is actually a kickback. In addition, because it is included in the price of the item RTI would purchase, you would be stealing from RTI and its funding providers. RTI knows that in some parts of the world commissions or kickbacks from suppliers are usual business practice, and we realize that you might feel uncomfortable telling a supplier that you cannot accept the offer. Even if other people use commissions, bribes, and kickbacks, RTI does not because we are committed to fair competition. If someone offers you a kickback, politely refuse the offer and explain that RTI's policy prevents you from accepting it. Your supervisor and the RTI Ethics Officer are ready to support you.



Led by Stephanie Earnshaw, an RTI Health Solutions study supported the role of aspirin for preventing coronary heart disease in certain patients.

8.3. Business Relationships with Close Family Members and Friends

Family members and friends are encouraged to apply for open job positions at RTI, but they will be hired only if they are the most qualified applicant for the job. If you have a potential business relationship with a close family member or friend, you must disclose the relationship to the RTI Ethics Officer in writing.

For more information, see Policy 1.4.4, Business Relationships with Close Family Members.

Q. My spouse works for a competitor. Do I need to inform RTI about this?

A. Yes. This is a potential conflict of interest, so you must provide this information to your supervisor. RTI can then determine whether an actual conflict exists and can work with you to find a solution. For example, if your husband or wife works on proposals or programs that are similar to your work, RTI could decide to assign you to a different project.

Q. In my country, we usually try to rent office space from family members before looking somewhere else. Is it acceptable to do this at RTI?

A. No. To create the best possible work environment, we rent office space based on the best quality, price, and overall suitability for RTI's work in that location.

Q. I am a Human Resources officer, and my cousin is applying for a position at RTI. How should I handle this situation?

A. You should inform your supervisor that you have a conflict of interest, and you should not participate in the evaluation of your cousin's application.

When dealing with or making decisions affecting suppliers, you are expected to act fairly, objectively, and in RTI's best interest at all times.

RTI's scientific stature is enhanced by researchers, like Susan Sumner, who participate in poster sessions, presentations, and other activities at association meetings, conferences, and expos each year.



8.4. Employment Outside of the Organization

RTI respects the personal lives of its employees, but some outside activities could conflict with RTI's interests. Employees must receive approval from the RTI Ethics Officer to perform any work outside of RTI that is within the same or similar scope and field as the work the employee is performing for RTI. Employees may hold political offices or serve on civic boards during their personal time.

For more information, see Policy 1.4.5, Work Outside the Company, or contact the RTI Ethics Officer.

Q. I am a part of the RTI Recruitment Services team supporting the Health Solutions organization. Another company has approached me about doing some freelance recruiting work as a consultant on my own time. If I only perform work for this company on nights and weekends, and I do not use RTI materials or equipment when doing so, can I accept this consulting offer?

A. No, unless the arrangement is explicitly approved in advance by the RTI Ethics Officer. Any work that is within the same field as the work you do directly for RTI is off limits, regardless of whether the work is as an employee or consultant. You must submit a disclosure form to and receive a determination from the RTI Ethics Officer before you accept any consulting or employment offer outside RTI.

8.5. Ownership or Financial Interests in Other Businesses

Employee ownership or partial ownership of other businesses can conflict with our ability to act in RTI's best interest. For this reason, RTI employees may not own, either directly or indirectly through a family member, a significant financial investment in any business that does business with RTI, wants to do business with RTI, competes with RTI, or is owned in whole or in part by RTI, unless the RTI Ethics Officer has given specific written approval in advance. If you have a question about whether (1) a company owned by you or a family member or (2) a company in which you have a financial interest creates a conflict of interest, contact the RTI Ethics Officer.



Barbara Massoudi led a team to redesign a CDC surveillance system called BioSense, which tracks health problems as they evolve, to safeguard and improve the health of the American people.

8.6. PHS Financial Conflicts of Interest

Because RTI is involved in research for the U.S. Public Health Service, we are subject to increased reporting requirements on potential financial conflicts of interest. Employees must disclose any outside financial interests that could potentially compromise, or have the appearance of compromising, the professional judgment of the employee when designing, conducting, or reporting research. It is the responsibility of the employee to be aware of RTI's company policy on financial disclosure and to comply with all required training and reporting.

For more information, see Policy 1.4.8, Specific Public Health Service Requirements Regarding "Objectivity in Research."

8.7. Organizational Conflicts of Interest

As a federal government contractor, RTI is required to identify, evaluate and resolve potential organizational conflicts of interest (OCI). Accordingly, the appropriate RTI staff must perform OCI and Limitations on Future Contracting due diligence reviews prior to preparing, certifying, and submitting a proposal to a U.S. government client.

For more information, see Policy 1.4.10, Organizational Conflicts of Interest/ Limitations on Future Contracting.

Doris Rouse and Beth McClure led a team to develop MANDATE, a web-based tool to assess the impact of new medical technologies on maternal, fetal, and neonatal mortality in low-resource settings.



Timekeeping



9. Timekeeping

As a major federal government contractor, RTI is subject to strict guidelines in the recording of all costs to government contracts, and it is essential that all RTI employees properly record their time to the appropriate projects.

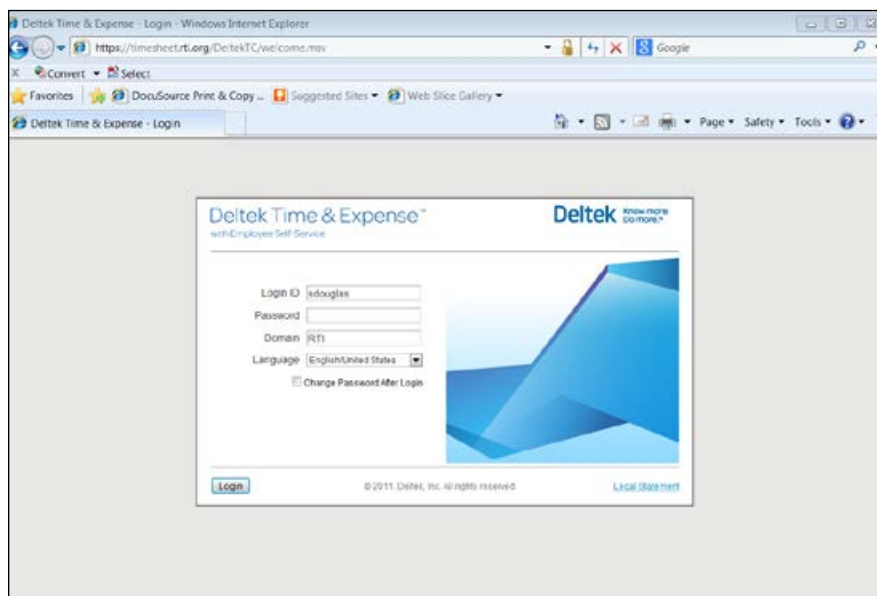
This requires employees to complete their timesheets daily. With very limited exceptions, employees are not permitted to complete and sign timesheets in advance of published time report due dates. Employees may not charge project time to overhead accounts. Accurate time reporting is necessary for us to be able to track money spent on projects and overhead expenses and to plan for future spending. Improper time charging is a serious offense and could result in significant penalties for both RTI and the employee.

Q. I spend equal amounts of time working on three different projects each day. One of the projects is over budget, but the other two are well under budget. Is it acceptable to charge the two under-budget projects for four hours each and not charge any time to the over-budget project to limit costs to this project?

A. No, you must report the hours that you actually worked on each of the projects. You cannot charge one project for work performed on another project.

For more information, see **Policy 2.1, Time Reporting.**

Improper time charging is a serious offense and could result in significant penalties for both RTI and the employee.



Left: As a nonprofit corporation, RTI invests its net revenue in facilities, programs, and capabilities to further its mission to improve the human condition by turning knowledge into practice.

10. Fiscal Responsibility

Everyone at RTI has a responsibility to our organization, our funders, and those who benefit from our research to use sound judgment when spending the organization's money and to account for both this money and our time honestly and accurately. In addition, all RTI employees and contractors worldwide must ensure that they have the requisite authorization from RTI management before issuing any requisition, entering into any contractual relationship, or making any other representation on RTI's behalf.

10.1. Accounting for RTI's Money Honestly

Honest accounting practices are vital to our survival as an organization. We are each responsible for accounting honestly for the money we spend. Honest accounting includes the following practices:

- We carefully account for all money spent on projects and on overhead expenses.
- We complete expense reports promptly and honestly.
- We submit accurate time reports.

Q. I am traveling on approved business and plan to stay with a friend instead of at a hotel. Am I allowed to claim lodging costs on my expense report?

A. No. RTI reimburses for actual costs for lodging. If you did not incur any actual costs, then you are not entitled to any reimbursement. You also cannot pay your friend to stay at his or her house. Although you could not, therefore, include lodging on your expense report, if your business unit uses per diems for meals and incidental expenses, then you will still incur, and be reimbursed for, those expenses.

Q. I am in a finance position on a project overseas, and I process invoices for payment. I have been asked by a technical staff person to pay an invoice for a prohibited item (weapons or alcohol). How should I handle this?

A. Certain costs are not allowed under U.S. regulations, and RTI is not permitted to use U.S. government funds to purchase these items. If you have been asked to use project funds to pay an invoice for a prohibited item, you should consult with the project's finance manager to determine how to handle the situation. You should not pay the invoice with project funds without additional approval. If you have further concerns, you should contact the RTI Ethics Officer.

USAID Kinerja Project health specialist Pak Mahlil Ruby and provincial coordinator Dina Limanto hold discussions with health stakeholders in Kabupaten, Jember, Indonesia.



Q. I traveled by airplane from North Carolina to Jakarta, Indonesia, on RTI business, and the airline lost my luggage. My luggage was not returned to me for two days. I bought two business suits and some personal items for the days when my luggage was missing. Can I claim the costs of the clothing and personal items on my expense report for reimbursement?

A. No. These are not legitimate business expenses. You should make arrangements with the airline to pay for any expenses related to your lost or missing luggage.

Q. I hosted a business dinner for a group that included subcontractor personnel who were performing work on one of RTI's cost-reimbursable prime contracts with the U.S. government. The cost of this business event was primarily related to the meal and corresponding tip, but the check also included the cost for a bottle of wine consumed with dinner. Is it permissible to simply identify the entire actual cost of this event as a dinner meal?

A. No. U.S. government acquisition regulations prohibit the billing of any alcoholic beverage costs on invoices for reimbursement of costs on this type of contract. You must take steps to separately identify the costs for the approved alcoholic beverages on your expense report so that they may be segregated in unbillable expense accounts.

Members of management came together in support of the 2025 RTI Vision Project to identify long-range focus areas for the RTI research and business roadmap.



Women of the slum neighborhood of Ennakhil in Morocco learn about low-interest housing loans that could help them finance their new housing units. [Photo: Morocco Local Governance Project staff]



Responsible Research



11. Responsible Research

11.1. Scientific Integrity and Research Misconduct

RTI staff and the scientific community have a responsibility to the public to maintain the highest principles of integrity and honesty in all aspects of our work. At RTI, scientific research is carried out based on the following principles:

- Research must try to describe “science and knowledge” that is as objective as possible.
- RTI will not support conclusions that cannot be supported by available data.
- People will be given credit for their work when they have a right to receive credit and only when they deserve to receive credit, according to accepted standards for authorship.

RTI employees have a responsibility to the public not only to prevent unethical behavior in research, but also to be alert to, and deal effectively with, instances in which unethical research behavior is suspected. Such behavior includes deliberate falsification of data (ranging from outright fabrication to purposely omitting conflicting data from research results), plagiarism, misappropriation of the ideas of others, and other practices that seriously deviate from those commonly accepted in the scientific community for proposing, conducting, or reporting research. It does not include honest error or differences in interpretation or judgment of data.

All employees must recognize and report to the Scientific Integrity Committee any potential scientific misconduct.

For more information, see Policy 1.3, Scientific Integrity, and Policy 1.3.1, Reporting Scientific Misconduct.

Left: Jennifer Gilliam at work with the Agilent6890 gas chromatograph.

Below: RTI's investigators and lab scientists characterize new molecules, develop novel scientific methods, and engineer advanced technologies that will improve the lives of people around the world.



11.2. Human Subjects Research

For a wide variety of RTI's research projects, we interact with human research subjects or use personal data about human subjects. Every researcher at RTI is responsible for minimizing the risks to human subjects who are involved in research performed by RTI. RTI operates under a federal-wide assurance with the Office for Human Research Protections (OHRP) of the U.S. Department of Health and Human Services (DHHS), which means we have committed to DHHS that we will comply with the federal human subjects regulations and we are able to carry out human subjects research independently. The RTI Institutional Review Board (IRB) is also registered with both OHRP and the U.S. Food and Drug Administration. Before we contact human subjects or collect or use any human subjects' data (including human biospecimens), the IRB must approve the research study.

For more information, see IRB Standard Operating Procedures or contact RTI's Office of Research Protection and Privacy.

11.3. Use of Animals in Research

RTI carries out a small number of projects that involve the use of animals that are bred specifically for research purposes. Any RTI researcher who carries out research with animals, whether at RTI or at a third-party facility or field site, must comply with all regulations and guidelines for animals' humane care and use.

For more information, see Policy 1.26, Training of Personnel Using Vertebrate Animals in Research

Reshan Fernando and Teresa Craig support analytical chemistry services for the National Toxicology Program.





Left: Yanyan Zhang works on research to accelerate the search for novel treatments for heart disease, hypertension, and diabetes.

Below, Ethan Klem worked on developing a layered solar technology that may lead to more affordable photovoltaics.





Ethics Helpline

Integrity Is One of RTI International's Core Values

We perform with the highest ethical standards of individual and group honesty. We communicate openly and realistically with each other and our clients.

Upholding this value is a shared responsibility.

If you suspect fraud or any other activity that might violate the RTI Code of Conduct, report it to the RTI Ethics Office.

E-MAIL **ethics@rti.org**

CALL **919.541.7070** OR

ANONYMOUSLY **877.212.7220** TOLL FREE

(International callers first dial applicable U.S. access code.)

For more information about the Code of Conduct and Ethics at RTI, go to <http://staffnet.rti.org/services/ethics>.

12. Resources

To ask for guidance about any of the issues covered in the Code, talk to your supervisor, your Human Resources partner, or RTI's Ethics Officer. To request more information about the Code or to report a possible violation of the Code, contact the Ethics Officer. The Ethics Officer serves as an advisor and resource for employees who have questions or concerns about ethical conduct and directs investigations, if needed. The following information explains how to contact RTI's Ethics Officer in Research Triangle Park, North Carolina, USA.

12.1. Ethics@RTI.org

Use this e-mail address to ask questions or to make a confidential report.

12.2. RTI Ethics Helpline

The RTI Ethics Helpline is available to all employees worldwide. RTI's Ethics Officer responds to all Helpline questions. The Ethics Officer will either answer your question directly or refer you to someone else at RTI who can answer your question. If you prefer, you may ask questions without giving your name. The Helpline telephone does not display the caller's name or telephone number. Helpline calls are not recorded or traced.

You can access the Ethics Helpline through the following numbers:			
From headquarters or from North Carolina:		919.541.7070 (local call)	
From Canada, the United States, or Mexico:		877.212.7220 (toll-free/no charge)	
From RTI regional offices in countries other than Canada, the United States, or Mexico:			
1. Dial the appropriate AT&T access number:			
China		Indonesia	001-801-10
North, Beijing CNCG	108-888	Kenya	Service is suspended
North, Beijing CNCG (Mandarin)	108-888	Spain	900-99-0011
PRC – South,	108-710	Sweden	020-799-111
Shanghai (China Telecom)	108-11	United Arab Emirates	8000-021
Telecom – Mandarin)	108-11	United Kingdom (Manchester)	0-800-013-0011
El Salvador	800-1785	United Kingdom (Sheffield)	0-800-013-0011
India	000-117		
2. Wait for the recorded message, "Thank you for using AT&T. Please dial the number you are calling."			
3. Dial 877.212.7220 (toll-free/no charge).			
<i>Note: If you do not wait to hear the recorded message, the call will not be connected. If you wait too long, an AT&T operator will ask you to provide a credit card or calling card and PIN. If this happens, please hang up and try again.</i>			
From countries without AT&T access numbers (e.g., Kenya)			
1. Dial the USA direct access number for the country from which you are calling.			
2. Dial 877.212.7220 (The operator may ask for a calling card number.)			

Acknowledgment



13. Acknowledgment

To begin working at RTI and to continue working at RTI, every employee must read and acknowledge annually that he or she will comply with RTI International's Code of Conduct. This annual acknowledgment ensures that all employees carry out their work in compliance with our shared values. Employees have two ways (online or paper form) to sign a Code of Conduct Acknowledgment Form.

13.1. Online

If you have access to the Internet and RTI International's StaffNet site, you must sign your Acknowledgment Form online. Employees with Internet and StaffNet access will receive an e-mail request every year to renew their Code of Conduct acknowledgment. This e-mail will contain a direct link to the login page of the Acknowledgment Form.

The screenshot shows the RTI StaffNet website interface. At the top left is the RTI International logo and 'StaffNet' text. To the right is a search bar labeled 'Search StaffNet' with links for 'Search Staff Directory' and 'Search News Archive'. Below the header is a navigation menu with items: 'About RTI', 'Quick Links', 'Forms & Policies', 'Systems', 'Research', 'Services & Support', and 'Collaboration'. The main content area is titled 'Code of Conduct Home' and includes a sidebar with links to 'Our Responsibilities', 'Code of Conduct', 'Standards of Conduct for RTI Associates', 'Acknowledgment Form', 'Questions', 'Links', and 'Contacts'. The main content area is titled 'Security Login' and contains the following text: 'RTI Code of Conduct and Policies & Procedures Acknowledgement. To acknowledge that you have read the RTI Code of Conduct and Policies & Procedures, please login using your RTI private network username and password below.' Below this text is a login form with fields for 'Username:' and 'Password:', and a 'Login' button. A note states: 'NOTE: Passwords are case-sensitive.' At the bottom, there is contact information: 'Questions? Comments? Please contact: RTI Ethics Officer' and 'Reviewed: 12.20.2007'.

13.2. Paper Form

If you do not have access to RTI International's StaffNet site on your computer, you must request a copy of RTI's Code of Conduct Acknowledgment Form from your supervisor or the RTI Ethics Officer. You must fax the completed form to the RTI Ethics Office at 919.541.6624. Please see page 51 for an example of the paper form.

Top left: RTI support for local charities.

Bottom left: The El Salvador Community-Based Crime and Violence Prevention Project involves youth in community park clean-up. [Photo: CCVPP team]

Bottom right: Parents help build a school on community-donated land in Klaten after the earthquake in Central Java, Indonesia. [Photo: DBE1 Central Java Team]



Example of the Paper Code of Conduct Acknowledgment Form

Code of Conduct Acknowledgment

To begin working at RTI and to continue working at RTI, every RTI employee must read and acknowledge annually that he or she will comply with RTI's Code of Conduct. This annual acknowledgment ensures that all employees carry out their work in compliance with our shared values. The acknowledgment can be made either via StaffNet or on a paper form.

Acknowledgment by Employee

I acknowledge that I have personally reviewed RTI International's Code of Conduct and agree to comply with its values, principles, and standards of professional conduct. I understand that the examples provided within this document do not attempt to cover every situation that may arise during the course of my employment. I also understand that it is my responsibility to seek guidance if I have questions about the Code or about a specific situation. Because RTI's policies and procedures are subject to change or modification at any time, with or without notice, I further understand that I must consult RTI's policies and procedures, where applicable, and that they will take precedence in the event they conflict with or are inconsistent with this Code of Conduct. I also understand that this Code is not intended to, nor does it create, a contract of employment between RTI and myself, nor does it guarantee that my employment with RTI will continue as long as I comply with its provisions. Finally, I understand that I must 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

