

CI Prohibited Practices

CI prohibits the following 10 practices in CI funded or managed operations and activities (“Prohibited Practices”).

1. **Corruption**

Offering, giving, receiving, or soliciting, directly or indirectly, anything of value (including but not limited to gifts, gratuities, favors, invitations, and benefits of any kind) to influence improperly the actions of another.

2. **Fraud**

Any act or omission, including a misrepresentation, that knowingly or recklessly misleads, or attempts to mislead, a party to obtain a financial or other benefit, or to avoid an obligation.

3. **Abuse**

Theft, misappropriation, waste or improper use of property or assets, either committed intentionally or through reckless disregard.

4. **Unmitigated Conflicts of Interest**

A conflict of interest is a situation that undermines, has the appearance of undermining, or potential to undermine the impartiality of an employee or other individual because of the possibility of a clash between the employee’s/individual’s self-interest and professional interest. A Conflict of Interest by itself is not a prohibited practice, rather the act of non-disclosure and non-mitigation is a prohibited practice. CI grantees are responsible for the identification and disclosure of any actual or potential conflicts of interest to CI and shall suggest mitigation measures in accordance with Grantee’s own conflict of interest policy. Such mitigation measures are subject to approval by CI, and Grantee is required to follow any mitigation instructions provided by CI.

5. **Collusion**

An arrangement between two or more parties designed to achieve an improper purpose, including to improperly influence the actions of another party.

6. **Coercion**

Impairing or harming, or threatening to impair or harm, directly or indirectly, any party or the property of the party to improperly influence the actions of that party.

7. **Obstruction**

Materially impeding a donor’s contractual rights of audit or access to information.

8. [Money Laundering](#)

Conversion or transfer of property, knowing that such property is the proceeds of crime.

9. [Terrorist Financing](#)

Providing in-kind, financial support or technical assistance for the purpose of, or in the knowledge that they are to be used to carry out terrorist acts.

10. [Retaliation](#)

Threatening or committing an act against someone because of their report of suspected wrongdoing or cooperation with an investigation into wrongdoing.

CI staff, service providers, grantees, and their respective staff and representatives, as well as any other person involved in the delivery of CI business are reminded of their obligation to report any suspicion of Prohibited Practices to the CI Ethics Hotline. It is available 24 hours a day, seven days a week, by logging on to at www.ci.ethicspoint.com or by dialing a toll-free number from anywhere in the world where Conservation International works that can be found on the website.

No employee or any other person will be discharged, threatened, or discriminated against in any manner for reporting in good faith what they perceive to be wrongdoing, violations of law, or unethical conduct.

Retaliation against any person who submitted a claim in good faith is subject to disciplinary action up to and including termination for cause and grantees or partners may be disqualified from submitting future funding proposals to Conservation International.

CI takes all allegations of Prohibited Practices seriously. All reported integrity-related grievances will be investigated, addressed, and if substantiated remedied in accordance with [CI's Anti-Fraud Policy & Guidelines for Investigations](#).