



**American  
Red Cross**

## **Code of Business Ethics and Conduct**



## A Message from the President and CEO

My fellow Red Crossers,

I am proud to work together each and every day to achieve our mission of preventing and alleviating human suffering in the face of emergencies. At the American Red Cross, our values and fundamental principles are guiding lights for how we approach this work.

The Red Cross is committed to providing a safe and healthy work environment, one that values diversity, equity and inclusion and positions us to do our best work as we deliver hope to people in their darkest hours. Each of us shapes the Red Cross culture through our choices and actions. Making the right choice requires a conscious effort to act with integrity, conduct ourselves ethically, and treat each other, our partners, and those we serve with respect.

The American Red Cross Code of Business Ethics and Conduct (the “Code”) provides a roadmap of the ethics and compliance guidelines all Red Cross employees and volunteers must follow. The Code is a foundational document that reminds us of the lawful and ethical manner in which the Red Cross has approached its lifesaving work since 1881. I implore all Red Crossers to read the Code and familiarize themselves with its content.

Should you have questions, or if at any time you experience something in the course of your work that you think raises an ethical issue, please speak with your Red Cross supervisor or manager. If for some reason that is not practical or you do not feel comfortable doing so, the Code identifies multiple resources the Red Cross has in place to assist you. I urge you to speak up if you have a concern — for the sake of our mission and those we serve.

From the bottom of my heart, I thank you for your personal commitment to the highest standards of ethical conduct and sound business practices. Your actions and choices build on our organization’s storied legacy of service and strengthen our lifesaving mission for years to come.



Gail J. McGovern



# Table of Contents

## Delivering Our Mission Ethically

About Our Code of Business Ethics and Conduct.....	1
--	---

## Upholding Our Standards

Abiding by Our Code of Business Ethics and Conduct.....	3
---	---

Oversight and Enforcement.....	3
--------------------------------	---

## Our Responsibilities

Acting with Integrity.....	5
----------------------------	---

Handling Concerns: Special Role of Supervisors and Managers.....	5
--	---

## Our Behaviors

Ensuring a Healthy, Safe and Productive Work Environment.....	7
---	---

Using Our Code.....	9
---------------------	---

## Speaking Up

When You Have Questions or Concerns Relating to the Code.....	11
---	----

Our Commitment to Non-Retaliation and Whistleblower Protection.....	13
---	----

## Our Practices

Conflicts of Interest.....	15
----------------------------	----

Business Gifts and Entertainment.....	17
---------------------------------------	----

Political Activity and Lobbying.....	17
--------------------------------------	----

Fraud Prevention.....	19
-----------------------	----

Supplier Relationships.....	19
-----------------------------	----

Information Security.....	21
---------------------------	----

Protecting Personal Information.....	23
--------------------------------------	----

Intellectual Property and Proprietary Information.....	25
--	----

Suspected Abuse and Neglect.....	27
----------------------------------	----

Media and Public Inquiries.....	29
---------------------------------	----

Social Media Use.....	29
-----------------------	----

Records Management and Financial Integrity.....	31
---	----

Anti-Bribery and Anti-Corruption.....	33
---------------------------------------	----

When You Have Questions or Concerns Relating to the Code.....	34
---	----

# Delivering Our Mission Ethically

## About Our Code of Business Ethics and Conduct

As a charitable organization, the American Red Cross (the “Red Cross”) places the utmost importance on acting with integrity. In other words, the way we approach our work is just as important as the results we achieve.

Our Code of Business Ethics and Conduct (the “Code”) details the responsibilities, behaviors and practices that guide our decisions, enabling the Red Cross to fulfill its mission in the right way. The Code applies to all employees and volunteers (collectively, “Red Crossers”).

In addition to this Code, Red Crossers are expected to act in accordance with:



Our Mission: The Red Cross prevents and alleviates human suffering in the face of emergencies by mobilizing the power of volunteers and the generosity of donors.



Our Vision: We, through our strong network of volunteers, donors, and partners, are always there in times of need. We aspire to turn compassion into action.



Our Values: Compassionate, collaborative, creative, credible and committed.



Our Fundamental Principles: Humanity, impartiality, neutrality, independence, voluntary service, unity and universality.

The Red Cross Concern Connection Line (CCL)  
1-888-309-9676 | [www.integrity-helpline.com/Redcross.jsp](http://www.integrity-helpline.com/Redcross.jsp)



# Upholding Our Standards

## Abiding by Our Code of Business Ethics and Conduct

Every Red Crosser is expected to:

- Read, understand and comply with all portions of this Code, in addition to the policies that apply to your role.
- Act with integrity and cooperate with any internal investigations into reports of unethical behavior.
- Complete all required trainings to maintain your ability to comply with the Code.
- Speak up if you become aware of possible violations of the Code, Red Cross policies and laws.

All Red Crossers are required to certify that they have received and reviewed the Code and will abide by it. Any questions about our Code should be directed to the Office of General Counsel at [compliance@redcross.org](mailto:compliance@redcross.org).

## Oversight and Enforcement

This Code is endorsed by and has the full support of the American Red Cross Board of Governors. The Board of Governors has delegated to management the responsibility for ensuring compliance with the Code. Violations of the Code may result in disciplinary action, up to and including termination.

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# Our Responsibilities

## Acting with Integrity

As Red Crossers, we must approach all aspects of our work honestly, fairly and in good faith.

-  **Follow** all applicable federal, state and local laws and regulations and Red Cross policies, as well as complete all of the trainings required to comply with the Code.
-  **Take action** when we have questions or concerns about compliance, ethics or business conduct issues by using any of the resources listed in the Speaking Up section.
-  **Never retaliate** against a Red Crosser for raising a concern or asking a question. The Red Cross does not tolerate retaliation.

## Handling Concerns: Special Role of Supervisors and Managers

Red Cross leaders and managers have special obligations to establish an ethical workplace. Supervisors and managers should lead by example and listen to concerns and divergent opinions in a manner that encourages Red Crossers to raise issues when something doesn't seem right.

In order to build and maintain a team culture of trust and integrity:

-  Lead by example in your decision making. Follow up on how your team is completing projects and confirm that they are achieving results the right way.
-  Speak with your team about integrity and ethics. Be clear that you expect Red Crossers to approach their work ethically at all times.
-  Demonstrate to your team that you will make time to listen, even if they are sharing difficult feedback or news.

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# Our Behaviors

## Ensuring a Healthy, Safe and Productive Work Environment

The Red Cross is committed to a safe workplace which values diversity, is free of harassment, discrimination, and intimidation, assures equal employment opportunity and empowers everyone to do their best work.



**Diversity, Equity and Inclusion:** We embrace the rich diversity around us and strive to be inclusive and continually enhance our competency in working with individuals, groups, and communities. Red Crossers, our clients, donors, and suppliers represent a wide array of cultures, ethnic backgrounds, ages, gender identities, abilities, lifestyles and beliefs.



**Fair Treatment and Progressive Discipline:** We are committed to the fair treatment of all employees and volunteers and to making certain that discipline is prompt, fair, and uniform. We endorse a philosophy of progressive discipline in which we attempt to provide notice of deficiencies and opportunities to improve whenever practical or reasonable.



**Non-Discrimination:** We do not discriminate against, nor do we tolerate discrimination against, any person based on any characteristic protected by applicable federal, state or local law. Please see our [Equal Employment Opportunity and Commitment to Diversity Statement](#) for more information.



**Security, Safety and Health:** We are committed to providing a secure, injury-free workplace and to following safety and health rules and practices.



**Environment:** We are committed to doing our part to reduce the humanitarian impacts of climate change. Please see our [Statement on Climate Change](#) for more information.

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**Harassment-Free Workplace:** We are committed to a work environment in which everyone is treated with respect and dignity. The Red Cross has zero tolerance for harassment.



**Substance-Free Workplace:** We strive to maintain a workplace that is free from the effects of drug and alcohol abuse. We will not tolerate any abuse of drugs or alcohol that imperils the health or well-being of employees, volunteers or customers; threatens operations; or compromises the safety of our lifesaving products and services.



**Violence-Free Workplace:** We promote a safe work environment and do not tolerate any type of violent behavior committed by or against employees and volunteers. The Red Cross maintains a weapons-free environment.

### Q: What can I do if I have concerns about my workplace?

**A:** Employees can raise concerns with their supervisor, with any other manager, or with HR.

Volunteers should report concerns to their supervisor using the Issue Resolution Form or, if the concern relates to their supervisor, to Volunteer Services. Further escalation steps are detailed in the Volunteer Handbook.

## Using Our Code

As a Red Crosser, you may face difficult or unclear situations related to our work. This decision roadmap can help you analyze your choices so you can make decisions that are ethical and comply with our Code and other Red Cross policies.

Is my decision honest and ethical?



Does my decision comply with the law, as well as Red Cross policies, values and standards?



Is my decision in the best interests of Red Cross clients, customers and donors?



How would my decision impact the reputation of the Red Cross if it became public?



What Red Cross resources can help me with the matter before I take action?



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## Speaking Up

### When You Have Questions or Concerns Relating to the Code

Every Red Crosser is responsible for speaking up when they need guidance or become aware of a violation of the Code. The following resources can help with your questions or concerns. When warranted, the Red Cross will investigate concerns and take appropriate action. The organization endeavors to protect the anonymity of individuals making good faith reports but may be required to disclose this information to others under certain circumstances.



Your **supervisor, another manager, HR or Volunteer Services** should be your first stop for assistance and advice.



The **Office of General Counsel (OGC) team** that addresses ethics and compliance issues can be reached at [compliance@redcross.org](mailto:compliance@redcross.org).



The **Red Cross Concern Connection Line (CCL)** is a 24-hour toll-free hotline at **888-309-9679** that anyone can use to report a concern regarding suspected fraud, waste, abuse, misappropriation, illegal or unethical conduct, violations of safety standards or violations of our Code or any Red Cross policy. Reports can be made online as well.



The **Red Cross Biomedical Regulatory Line (BRL)** is a 24-hour toll-free hotline at **800-741-4738** that anyone can use to report concerns relating to the collection, manufacturing, processing, distribution or utilization of blood or blood components. Reports can be made online as well.

Red Crossers may also contact the **Office of the Corporate Ombuds** for a confidential discussion about concerns, complaints, or questions involving the Red Cross. The Ombuds is a neutral and impartial resource that can help identify and discuss options for addressing or resolving concerns. The Ombuds may be contacted at **202-303-5399**, toll-free at **866-667-9331**, or by email at [ombudsman@redcross.org](mailto:ombudsman@redcross.org). Using the services of the Ombuds is voluntary and informal and not a substitute for the formal complaint channels listed above.

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## Speaking Up



### Our Commitment to Non-Retaliation and Whistleblower Protection

Retaliation, including harassment and intimidation, against Red Crossers who seek advice, raise a concern, or cooperate in an investigation is strictly prohibited. If you believe you have been subject to retaliation reach out to one of our reporting resources. Any Red Crosser who engages in retaliation will be subject to discipline up to and including separation from the organization. Please see our Whistleblower Protection Policy for more information.

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### Q: Why does the Red Cross have a protection policy for whistleblowers?

**A:** The Red Cross relies on Red Crossers to raise good faith concerns regarding business activities. When Red Crossers report concerns about ethical, compliance or business conduct issues, they surface information that allows the organization to investigate and make improvements or corrections as needed.

The organization has a Whistleblower Protection Policy to make it clear that the Red Cross wants to hear feedback about its practices, inform everyone of the multiple ways suspected misconduct can be reported and to be transparent about its expectation that no one who raises a good faith concern can be retaliated against.

## Our Practices

### Conflicts of Interest

We must take action to address personal or business interests that are or appear to be conflict with the interests of the Red Cross. It's not uncommon for personal and business conflicts to arise. It is important, however, that you disclose a conflict or potential conflict promptly, following the steps outlined in our Conflict of Interest Policy, to allow Red Cross to manage the conflict. Red Crossers must comply with any remediation requirements the Investigations, Compliance and Ethics (ICE) office communicates.

Red Crossers must:

- ✓ **Always act in the best interest** of the Red Cross.
- ✗ **Avoid** situations where your ability to perform your Red Cross duties would be impaired due to a personal or business interest.
- 📢 **Disclose** any potential or actual conflict of interest promptly, using the process outlined in our Conflict of Interest Policy. ICE will work with you to mitigate the conflict.

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### Examples of Conflicts of Interest

- Anna's sister owns a printing company. Anna works for the Red Cross and recommends her sister's printing company to the Chief Development Officer for an upcoming event, but does not disclose her connection to the company.
- Bill is managing a request for proposal process for the Red Cross. The CEO of one of the participating vendors is his sister-in-law.
- Clyde works in Development and serves on the board of a small nonprofit. Clyde provides the nonprofit with Red Cross donors' names and addresses to use for the nonprofit's holiday mailing.

## Our Practices

### Business Gifts and Entertainment

As we conduct business on behalf of the Red Cross, it is imperative that we maintain the highest standards of business and personal ethics. Our Business Gifts and Entertainment Policy provides guidance on the appropriate acceptance of gifts and entertainment in business dealings.

Key guidelines include:

-  Gifts in the form of cash or cash equivalents, such as gift cards or certificates, are never appropriate.
-  Gifts and entertainment may never be provided, or accepted, by Red Crossers in the context of a contract negotiation or RFP process.
-  Any single gift or entertainment accepted must have a nominal value no greater than \$75 and meet all of the guidelines in our Business Gifts and Entertainment Policy.

### Political Activity and Lobbying

As a charitable organization, the Red Cross must maintain its impartiality and comply with legal requirements for lobbying and engaging in political activity. We encourage all Red Crossers to exercise their right to participate in civic and political activities in an individual capacity, but Red Crossers must make it clear that any views and actions are their own and not those of the Red Cross.

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#### Hypothetical Situation:

Diana is a Red Cross employee and knows several candidates running for Congress in the region. They have all been supporters of the Red Cross and a few of them are her personal friends. She anticipates some of them will ask for the opportunity to speak at Red Cross events in the next several months.

#### What should she do?

Diana may support any of the candidates, but only in the capacity of a private citizen and not as a representative of the Red Cross.

The Red Cross is prohibited by law from participating in, intervening in or attempting to influence or show bias in political campaigns.

# Our Practices

## Fraud Prevention

Fraud is a deceptive act intended to achieve financial or personal gain. Misusing Red Cross funds is a serious offense as well as a threat to the organization's reputation. Red Crossers must report any suspected fraud, waste, abuse, or other misappropriation of Red Cross resources or assets.

Examples of fraud include:



Using a Red Cross-issued mission card, travel card, purchase card or procurement card for personal expenses unrelated to Red Cross business.



Misusing funds accessible through electronic means or misappropriating assets such as computers, phones, or other Red Cross resources.



Making an entry or influencing someone to make an entry on records or financial statements that is intentionally inaccurate or non-compliant with regulatory, legal or organizational standards as detailed in the Financial Manual of Policies and Procedures.

## Supplier Relationships

The Red Cross relies on many suppliers to achieve its mission and when possible seeks to work with diverse suppliers and suppliers with environmentally sound practices. We insist on honesty, integrity and fairness in all aspects of our business with suppliers. The Red Cross Procurement and Contracting Policy, Business Gifts and Entertainment Policy and related procedures outline the guiding principles for all supplier contracts. Red Crossers who have concerns about our contracting process or supplier adherence to our standards should contact the CCL.

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## Protecting Donor Dollars from Fraud

Many Red Crossers are issued travel cards, purchase cards, procurement cards or mission cards for their use on official Red Cross business. Red Crossers who make card purchases, as well as those who review and approve the purchases, should be aware that use of the cards for personal expenditures is theft and may be reported to law enforcement.

Unfortunately, emergencies and disasters are prime opportunities for fraudsters who seek to embezzle funds from the Red Cross. Before providing services, either financial or community resource referrals, to someone seeking disaster assistance, it is essential that a responder follows Disaster doctrine and verifies that the individual has, in fact, been impacted by a disaster event. Always be alert to potential scams and raise any "red flags" or concerns to your manager, supervisor or the CCL immediately.

## What would you do?

You receive an email from a Red Cross executive from a different business unit who tells you they are currently traveling. The email asks you to make a payment to a supplier and explains that it is an urgent request because the Red Cross is currently negotiating a new contract with the supplier.

## *Should you process the payment?*

No. This is a phishing email that is designed to trick you into releasing Red Cross funds to a fraudulent actor. You should alert Information Security.

## Our Practices

### Information Security

The Red Cross relies on its employees, volunteers and contractors to remain vigilant and help prevent cybersecurity attacks from threatening the organization. Given the impact a cybersecurity incident would have on our lifesaving work, every Red Crosser needs to take action to manage and mitigate information security risks.

Key requirements include:

- Complying with the Information Security Policy, Standards, Procedures, and Guidelines, whether you are working on a personal device or Red Cross-issued device.
- Reporting security incidents so that IT can move quickly to address the situation and protect the Red Cross.

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# Our Practices

## Protecting Personal Information

The Red Cross is committed to privacy and the responsible handling of the personal data we receive from our clients, donors, employees, volunteers and other constituents.

Each Red Crosser that collects, handles, or uses confidential information must ensure it is managed and protected in accordance with our Protecting Personal Information Policy and the Confidential Information and Intellectual Property Agreement they sign at the start of their work with Red Cross.

Key requirements include:

-  We are transparent with our stakeholders regarding our collection and use of their personally identifiable information. We collect and use such information only as needed to accomplish the Red Cross mission and our humanitarian activities.
-  We handle personally identifiable information responsibly and protect it from improper use and disclosure. Whenever possible, privacy protections are incorporated into Red Cross systems and programs and enforced throughout the organization.
-  Report improper use or disclosure of confidential personal information immediately to the Chief Information Security Officer at [CISO@redcross.org](mailto:CISO@redcross.org) and the Privacy Officer at [privacyofficer@redcross.org](mailto:privacyofficer@redcross.org) so they can take action.

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### What is personally identifiable information?

In order to achieve our mission, it is sometimes necessary for the Red Cross to obtain or transmit personally identifiable information including:

- Blood type and donation records of a blood donor
- Biographical information for a shelter resident
- Personal information submitted with applications for Training Services programs

### What would you do?

Elias was processing benefits information for several new employees. He sent the last spreadsheet late in the evening and he neglected to put on a password protection.

### Should Elias report it?

Yes. As soon as Elias realized what had happened, he emailed the Chief Information Security Officer at [CISO@redcross.org](mailto:CISO@redcross.org) and the Privacy Officer at [privacyofficer@redcross.org](mailto:privacyofficer@redcross.org) so they could take action.

## Our Practices

### Intellectual Property and Proprietary Information

The American Red Cross is one of the world's most trusted and recognized brands, and the Red Cross name and emblem are valuable Red Cross assets. The Red Cross takes steps to protect our name and emblem, as well as the other intellectual property and proprietary information that is vitally important to our work, including copyrights, patents and inventions.

In order to protect the information and ideas associated with the work of the Red Cross, all Red Crossers sign the Confidential Information and Intellectual Property Agreement confirming that the intellectual property they conceive or develop in their roles is owned by the Red Cross. The Agreement also requires Red Crossers to maintain the confidentiality of information they may learn in the course of their work, both Red Cross information and the information of those we serve.

Whenever Red Crossers use the Red Cross name and/or emblem, we all must follow our Brand Standards to ensure we use them in a manner consistent with Red Cross standards and in keeping with the standards of the International Red Cross Red Crescent Network.

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## Our Practices

### Suspected Abuse and Neglect

Red Crossers may have contact with children or vulnerable adults in the course of their work and we are committed to protecting children and vulnerable adults from abuse and neglect and to addressing incidents of suspected human trafficking while in our care. Our Policy on Abuse and Neglect of Children and Vulnerable Adults requires Red Crossers to take immediate action if they observe or suspect abuse or neglect of a child or vulnerable adult, including suspected human trafficking.

If you observe or suspect abuse of a child or vulnerable adult while conducting Red Cross business, you must:



Contact the appropriate local reporting authorities, either Child Protective Services or Adult Protective Services. Please see our Procedure for Reporting Suspected Abuse and Neglect for detailed information on making reports.



If you observe a child or vulnerable adult in immediate danger — such as physical assault, threats of violence, or emergency medical needs — you must contact law enforcement immediately.



If you believe a Red Crosser is involved, you must also report the matter to the CCL in addition to the authorities.

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### Hypothetical Situation:

Fatima is a first-time shelter worker. In her conversations with a shelter resident, Fatima suspects the person may be a victim of human trafficking but is not sure.

### What should she do?

In line with the Red Cross Procedure for Reporting Suspected Abuse or Children or Vulnerable Adults, Fatima can contact a Disaster Health Services or Disaster Mental Health worker for guidance. She can also call the CCL for help.

If, at any time, Fatima observed that the shelter resident was physically injured or in imminent danger, she should contact law enforcement immediately.

# Our Practices

## Media and Public Inquiries

The Red Cross is committed to sharing our story with local, national and international media to inform and inspire the public to support the organization's mission. All public disclosures, press releases, speeches and other communications must be honest, accurate, timely and factual. To help the organization meet its commitment to providing accurate information to the public, Red Crossers should follow these guidelines:



Forward all requests for information from the media and other external organizations to the Communications team in your region or to the national headquarters Communications Department at [media@redcross.org](mailto:media@redcross.org).



Do not make statements on behalf of the Red Cross unless you have prior approval from your regional Communications team or, if appropriate, the national headquarters Communications Department.



Direct anyone who is reporting fraud or a concern regarding a Red Cross program, employee or volunteer to the CCL.

## Social Media Use

Social media is an integral communications tool, and our staff and volunteers are our best advocates. While we encourage Red Crossers to share Red Cross content on their personal platforms, remember that when you state your Red Cross affiliation you are representing the organization online. All social media postings and reshares must comply with our Social Media Guidelines. You must never tag official Red Cross social media handles in posts that could be perceived as contrary to the Fundamental Principles.

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## What would you do?

Gary's LinkedIn account identifies his position with the Red Cross. When he reads about new legislation he believes would negatively affect the Red Cross, he wants to post on LinkedIn asking his connections to write their representatives and ask them to vote against the bill.

## What should Gary do?

Do not make the post. Gary's opinion may be misconstrued as the opinion of the Red Cross. As a 501(c)(3) charitable corporation with tax exempt status granted by the Internal Revenue Services, the Red Cross must follow clear legal requirements about engaging in political activity and lobbying.

## What should Hannah do?

Hannah has been on an extended disaster relief deployment following an earthquake. After conducting damage assessments, Hannah is devastated by the loss of life and property. She believes the local government mismanaged the early response and takes video at a Red Cross disaster relief site. Hannah plans to post the footage to Instagram stating "this all could have been avoided if the current government had their priorities straight. #redcross #disasterrelief."

## Is this permissible?

No. Expressing your opinion on social media about the local government along with the Red Cross hashtag and photo of a Red Cross disaster relief site violates Red Cross Social Media Guidelines and should not be posted.

## Our Practices

### Records Management and Financial Integrity

In order to manage our business with integrity and in compliance with laws, we must maintain accurate records and have proper controls over financial transactions. All financial information must be prepared and maintained in accordance with U.S. Generally Accepted Accounting Principles (GAAP) and other applicable laws as well as the Financial Manual of Policies and Procedures.

Additionally, all Red Crossers are responsible for maintaining organization documents and records in a manner that is accurate, complete and in compliance with our Records Management Policy. Here are some key guidelines:



Accurately account for expenses, hours worked, reimbursement requests and assets and resources. If you have a question about how a particular transaction should be documented, seek guidance from your manager or supervisor.



Maintain Red Cross records, accounts and financial statements in a manner that accurately reflects the transaction and conforms with applicable accounting and legal requirements.



Manage and preserve records as required for legal, regulatory, or compliance reasons, as well as for business operations and historical purposes. Understand how to properly store, retrieve and archive information and whether any of the information you handle is subject to records retention and destruction requirements, consistent with the Records Retention and Destruction Procedure.

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## Our Practices



### Anti-Bribery and Anti-Corruption

A Red Crosser may not offer, solicit, make or receive a payment for any improper purpose such as a bribe, kickback or other inappropriate benefit. Red Crossers must comply with laws relating to interactions with foreign government officials, such as the U.S. Foreign Corrupt Practices Act, which prohibits giving, offering or promising anything of value to a foreign government official in order to obtain an improper benefit, an unfair advantage, or to retain business. Additionally, Red Crossers must not conduct business with sanctioned individuals, entities or sanctioned countries that are designated by the Office of Foreign Assets Control and must also ensure that no business transaction is used to launder money or to finance terrorist activities. If you have a question about anti-bribery, anti-corruption or possible sanctioned countries, contact the office of General Counsel.

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Your **supervisor, another manager, HR or Volunteer Services** should be your first stop for assistance and advice.



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**American  
Red Cross**

### Mission

The American Red Cross prevents and alleviates human suffering in the face of emergencies by mobilizing the power of volunteers and the generosity of donors.