Chapter 3 Human Resources
Sub-Chapter 3.11 Conduct and Disciplinary Measures
3.11.5 PAHO Code of Ethics

Purpose and scope

10. This Code sets out the ethical principles and standards of behavior that guide the conduct of Pan American Health Organization (PAHO or the Organization) personnel and support a culture of integrity, accountability, and respect across the Organization. This Code applies to everyone who works in a PAHO workplace (e.g., anywhere the Organization's work takes place or where people meet at the direction or invitation of the Organization) regardless of the type of contract held or its duration. The Code also applies to other individuals and entities performing work for or on behalf of PAHO where their contract, agreement, terms of reference, memorandum of understanding, or other applicable instrument incorporates or otherwise requires compliance with this Code. PAHO further expects all other persons and entities working with PAHO to conduct themselves in a manner consistent with the Code.

20. PAHO personnel are required to uphold the highest standards of conduct at all times, guided by the Organization's values and ethical principles, the Oath or Declaration of Office, and its institutional framework (i.e., PAHO Staff Regulations and Staff Rules; PAHO Financial Regulations and Financial Rules; and PAHO principles, policies, procedures, guidelines, and contractual obligations). These principles establish the foundation for ethical behavior, decision-making, and professional conduct, ensuring that all actions reflect integrity, respect, and accountability. They serve as the standards against which conduct is measured and must be applied consistently in the performance of official duties.

Values and ethical principles

30. PAHO operates on five core institutional values – equity, excellence, integrity, respect, and solidarity. In addition, this Code establishes a clear framework of ethical principles and behavioral expectations that is consistent with the International Civil Service Commission's (ICSC) Standards of Conduct for the International Civil Service, the Charter of the Organization of American States, and the Charter of the United Nations.

PAHO's values

- **Equity:** Striving for fairness and justice by eliminating differences that are unnecessary and avoidable.

- **Excellence:** Achieving the highest quality in what we do.
- **Integrity:** Ensuring transparent, ethical, and accountable performance.
- **Respect:** Embracing the dignity and diversity of individuals, groups, and countries.
- **Solidarity:** Promoting shared interests and responsibilities and enabling collective efforts to achieve common goals.

Ethical principles

40. The following ethical principles establish the conduct and decision-making expected of PAHO personnel:

- **Accountability:** We are accountable and answerable for our actions, decisions, and commitments while performing our duties.
- **Fairness:** We treat others fairly and impartially by recognizing individual needs, offering support, and promoting equal opportunity.
- **Independence:** We do not seek or receive instructions from any government, person, or entity external to PAHO or the World Health Organization, and refrain from any action that might reflect poorly on our status as international civil servants.
- **Integrity:** We are committed to ethical, honest, and transparent behavior and ensure that our actions align with the core values of the Organization. We use PAHO's resources responsibly.
- **Loyalty:** We are loyal to the Organization's goals, mission, and values, and act in its best interests. A shared vision of PAHO ensures that the interests of the Organization take priority over our individual interests.
- **Respect:** We treat everyone with dignity, equality, worth, and kindness.
- **Respect and value for different cultures:** We respect and value the rich diversity of world cultures to foster a respectful, safe, and inclusive work environment.

Responsibilities

50. The values and principles above constitute the standards against which conduct is assessed. Personnel are expected to apply them consistently across all professional contexts and to exercise sound judgment when addressing ethical considerations or dilemmas that arise in the course of their work. All personnel, managers, and the Organization share responsibility for upholding this Code and fostering a culture of integrity, accountability, and respect.

    50.1. **Personnel:** PAHO personnel must act with integrity, impartiality, professionalism, and respect in the performance of their duties. They must also report suspected misconduct to the Investigations Office (INV) (which may be done anonymously), cooperate with audits and investigations, and seek guidance from the Ethics Office (ETH) on prospective ethical or conduct-related issues before taking action or when facing an ethical dilemma.

    50.2. **Managers:** In addition to the responsibilities of all PAHO personnel, managers must also lead by example, address misconduct promptly, support awareness of applicable standards, and protect personnel from retaliation for good-faith reporting or cooperation with oversight activities.

    50.3. **Organization:** As an Organization, PAHO is responsible for providing appropriate guidance, rules, regulations, training and reporting mechanisms, taking timely action in response to alleged violations, protecting personnel from retaliation for raising good faith concerns or for cooperating with an investigation or audit, and imposing administrative or disciplinary measures where warranted.

Standards of conduct

60. PAHO personnel are expected to always comply with applicable legal, professional, and organizational standards in the performance of their duties. They must also, at all times, respect applicable national and local laws.

Privileges and immunities

70. As an international organization, PAHO enjoys such privileges and immunities as are necessary for the fulfillment of its purposes and the independent exercise of its functions. These privileges and immunities are accorded in the interests of the Organization and not for the personal benefit of individual personnel. Accordingly, personnel may be immune from legal process only in respect of words spoken or written and acts performed in their official capacity and within the scope of their functions. The privileges and immunities do not provide protection for private conduct or conduct outside official functions. Where, in the opinion of the Organization, an applicable immunity would impede the course of justice and can be waived without prejudice to the interests of PAHO, the Director has the authority and the duty to determine the scope of, and where appropriate waive, that immunity. In such cases, the staff member concerned may be subject to the applicable civil, administrative, or criminal processes of the competent national authorities.

Local laws and domestic employees

80. PAHO's personnel are responsible for observing all local laws and regulations, including motor vehicle regulations and the payment of all applicable taxes and duties.

90. PAHO's personnel are responsible for maintaining required documentation and records and complying with national wage and other employment obligations for their employees.

100. Failure to comply with these requirements may result in action by the host country and administrative and/or disciplinary measures by the Organization.

Fostering a safe, respectful, and healthy workplace

110. PAHO fosters a workplace grounded in dignity, respect, equality, and inclusion, where all individuals are treated fairly and without discrimination. PAHO is committed to maintaining a safe, respectful, and healthy work environment, and personnel are expected to contribute to and uphold this commitment.

120. PAHO recognizes that the health, safety, and well-being of personnel are essential to the effective delivery of its mandate. PAHO personnel must comply with applicable health and safety requirements and contribute to a workplace that minimizes risks of harm and promotes well-being. PAHO personnel must not perform duties while impaired in a manner that could endanger themselves or others, and they must raise any concerns that may affect the safe performance of their duties through appropriate channels. PAHO personnel must promptly report unsafe conditions, hazards, incidents, or injuries to the Department of General Services Operations (GSO) to ensure that appropriate measures can be taken.

130. PAHO personnel must comply with applicable health and safety requirements and report health and safety concerns through appropriate channels.

140. PAHO is committed to a work environment characterized by dignity, respect, equality, inclusion, and non-discrimination. PAHO personnel must treat others fairly and respectfully, support an inclusive workplace, and ensure that employment-related decisions are based on merit and other objective factors.

Personal harassment and abuse of authority

150. PAHO prohibits harassment, bullying, and abuse of authority. PAHO personnel must not engage in such conduct. Allegations will be addressed in accordance with the applicable PAHO policy and procedures on the prevention and resolution of harassment in the workplace.

Sexual misconduct

160. PAHO maintains a zero-tolerance approach to sexual misconduct. PAHO personnel must not engage in sexual exploitation, sexual abuse, or sexual harassment; must comply with applicable reporting obligations; and must adhere to the Organization's policy on preventing and responding to sexual misconduct.

Protecting the Organization

170. PAHO personnel must protect and use the Organization's resources responsibly, ensuring their proper use with integrity, accountability, and care.

Privacy and confidential information

180. PAHO personnel must safeguard sensitive and confidential information obtained in the course of their work and use, disclose, retain, and dispose of such information only in accordance with applicable PAHO policies and legitimate business needs. This obligation includes protecting the identity of victims, witnesses, and subjects of investigations, as applicable.

PAHO assets

190. PAHO personnel must protect and use PAHO assets responsibly and only for authorized purposes, in accordance with applicable policies. This includes physical, electronic, financial, informational, and intellectual assets, as well as time and other organizational resources entrusted to personnel in the performance of their duties.

Accurate recordkeeping

200. PAHO records must accurately and completely reflect the Organization's activities, decisions, and transactions. PAHO personnel must create, maintain, retain, and dispose of records in accordance with applicable policies and controls and not falsify, conceal, alter improperly, or destroy records that may be relevant to administrative, audit, or legal processes.

Conflicts of interest

210. A conflict of interest arises where personal, financial, business, social, or family interests or relationships could reasonably interfere, or appear to interfere, with the impartial and objective performance of a person's duties for the Organization.

220. A conflict of interest exists when, for example:

- There is a clash between an individual's personal or private interests and their official public responsibilities;
- PAHO personnel engage in a business or personal relationship that may not be in the best interests of the Organization;
- PAHO personnel or their family have a business interest in an enterprise (possibly family-owned) that could compromise the staff member's loyalty to the Organization;
- Someone might reasonably question whether an individual's official public actions or decisions are influenced by their personal or private interests or the interests of someone

closely related to them by blood or marriage, friends, or individuals with whom they have a significant personal relationship or affiliation outside of PAHO;

- PAHO personnel are in a position to use their contacts or position in the Organization to advance their personal or private interests or those of someone closely related to them by blood or marriage, friends, former colleagues, or individuals with whom they have a significant personal relationship or affiliation outside of PAHO;
- A staff member awards a contract to an individual with whom they share personal or private relations, such as someone closely related to them by blood or marriage, friends, former colleagues, or individuals with whom they have a significant relationship or affiliation outside of PAHO; or
- PAHO personnel offer or accept payment back to them (e.g., kickback), directly or indirectly, of a portion of the purchase price by the seller to induce purchases, concessions, commissions, and/or bonus; or may benefit from someone in the hopes of ensuring a particular decision or improperly influencing future purchases.

230. PAHO personnel must avoid actual, potential, and perceived conflicts of interest and act with loyalty, independence, and impartiality in the best interests of the Organization. PAHO personnel must disclose actual, potential, and/or perceived conflicts to ETH promptly and seek guidance or prior approval from ETH where required under applicable PAHO policies.

Disclosing conflicts of interest

240. If PAHO personnel think that a real, potential, or perceived conflict of interest may exist, or if they have any doubts in this regard about (1) their personal or private interests, (2) the interests of someone closely related to them by blood or marriage, or (3) the interests of friends or individuals with whom they have a significant personal relationship or affiliation outside of PAHO, then they must immediately disclose all of the relevant facts to their manager or supervisor, ETH, or any of the Integrity and Conflict Management System (ICMS) resources, for a determination, before participating in any activities or taking any decision. PAHO has the responsibility to conduct a timely evaluation of any real, potential, or perceived conflict of interest disclosed and promptly inform personnel of its decision.

250. A person is "closely related by blood or marriage" if they are the mother, father, brother, sister, son, daughter, father-in-law, mother-in-law, son-in-law, daughter-in-law, sister-in-law, brother-in-law, grandmother, grandfather, grandson, granddaughter, uncle, aunt, nephew, niece, husband, wife, step-parent, step-child, step-brother, step-sister, guardian, or ward of PAHO personnel.

260. A "significant personal relationship" is a close and ongoing personal relationship between two people who choose to live in "marriage-like" relationships without being married or who share their lives in a mutually supportive relationship involving emotional and economic interdependence.

270. An "affiliation" is a direct or indirect financial or business interest that could potentially influence, or be perceived to influence, an individual's independent judgment or objectivity in performing their duties.

280. Employment applicants may be asked to declare any real, potential, or perceived conflicts of interest. Before entry into the Organization, successful applicants may be required to divest any such interests to avoid conflicts.

Declaration of interests

290. PAHO personnel must carefully evaluate on a regular basis whether their interests, as well as those of immediate family members, comply with the conflict-of-interest provisions of this Code. The term "immediate family member" means spouse, children, parents, and siblings, and the children, parents, and siblings of the staff member's spouse. PAHO personnel must take into account the nature of their official duties and the characteristics of their interests, as well as those of their immediate family members.

300. PAHO personnel must immediately inform ETH in writing if they or their immediate family members have any interest in or association with any entity with which they may be required to have official dealings on behalf of the Organization, or which has a commercial interest in the Organization's work or common areas of activity with the Organization.

310. PAHO personnel must also report any interest or association with entities whose policies, practices, or interests conflict with those of the Organization or entities whose primary activities or commercial interests are fundamentally incompatible with PAHO's mandate to protect and promote public health.

320. In addition to the above, personnel in specific employment categories or functions designated by the Director must report annually to ETH using PAHO's Declaration of Interest Form as to whether they or their immediate family members have any of the above-referenced interests or associations. The categories of personnel designated to submit such Declaration of Interest Forms, including those on acting appointments, include:

- Executive Directors;
- Department Directors;
- Unit Chiefs;
- PAHO/WHO Representatives (PWRs);
- Administrators;
- All other staff at grade P6/D1 and above (inclusive) – referring to the grade of the person, not the grade of the post;
- All personnel in Procurement (PRO), Financial Resources Management (FRM), and Human Resources Management (HRM); and
- Members of PAHOERC.

Divestment of interests

330. If PAHO personnel are advised by the Organization that a conflict of interest exists and that they must divest themselves of a particular interest, they will be required to do so within 120 calendar days of being notified and must provide ETH with evidence of the divestment. Furthermore, they must do so through an arm's-length transaction, meaning a transaction conducted with someone who is acting independently. Consequently, PAHO personnel may not sell or transfer a financial interest, including personal assets, to an immediate family member to circumvent the compliance measures outlined above.

Abstaining where a conflict of interest exists

340. If PAHO personnel have a conflict of interest, they may not participate in any recommendation or decision that would directly or preferentially benefit their personal, financial, or professional interests or the interests of someone closely related to them by blood or marriage, friends, former colleagues, or individuals with whom they have a significant relationship or affiliation outside of PAHO.

Waiver of conflict of interest

350. Only the PAHO Director and his/her delegates can waive real, potential, or perceived conflicts of interest if, after having considered the relevant circumstances, they determine that:

- The situation is unlikely to adversely impact the best interests of the Organization;
- The conflict of interest is so remote or insignificant that it cannot reasonably be regarded as likely to influence them; or
- The interests of PAHO outweigh the concern that a reasonable person may have regarding the integrity and/or objectivity of the activity in question.

360. The measures outlined below are intended to minimize the possibility of a real, potential, or perceived conflict. Conflict-of-interest issues are particularly fact-specific, and it is not possible to describe/enumerate every conceivable situation that could give rise to a conflict of interest. PAHO personnel are responsible for disclosing the facts of any such situation and seeking guidance from ETH if they have any doubt.

Conflicts due to personal and business relationships

370. PAHO personnel may not use their position with PAHO for any private gain or personal benefit; the endorsement of any products, services, or businesses; or the private gain of any person closely related to them by blood or marriage, friends, former colleagues, or individuals with whom they have a significant relationship or affiliation outside of PAHO.

380. Specifically, they may not directly or indirectly cause the Organization to enter into contracts with:

- Any persons:
    - Closely related to them by blood or marriage; or
    - With whom they are involved in a significant personal relationship; or
- Companies, entities, organizations, or associations where:
    - Anyone closely related to them by blood or marriage or with whom they are involved in a significant personal relationship was previously or is currently an officer, director, owner, trustee, general partner, agent, attorney, consultant, contractor, or employee; or

- Someone with knowledge of relevant facts could reasonably question their impartiality in causing the Organization to enter into the contract.

Hiring of spouses and family members

390. Consistent with Staff Rule 410.3, the Organization will not normally employ a person who is closely related to personnel by blood or marriage. If personnel become aware that such a person has applied for employment with the Organization, they must immediately notify HRM, which will consult with ETH to determine whether a conflict of interest exists and recommend appropriate action.

400. Consistent with Staff Rule 4103.1, and subject to ETH approval, the Organization may contract a spouse or an individual with whom a member of the PAHO personnel has a significant personal relationship, if, after conducting a competitive selection process for a position requiring specialized knowledge, that individual is the best candidate.

410. In accordance with Staff Rule 410.3.2, neither individual may serve in the same entity or in a supervisory or subordinate relationship to the other, and neither may participate in any decision affecting the other's recruitment, assignment, employment status, entitlements, advancement, promotion, or evaluation.

Employment and activities outside of PAHO

420. Except as provided below, PAHO personnel must obtain prior written approval from ETH before engaging in any paid or unpaid (volunteer) activity outside the Organization. Examples include teaching, lecturing, volunteering, and participating on boards or advisory committees. ETH may consult with supervisors in making its determination.

- Private non-remunerated activities for social or charitable purposes that (i) have no relation to the individual's functions or to the work of PAHO; (ii) do not involve PAHO's name, position, information, or resources; and (iii) take place outside working hours or during periods of authorized leave may be engaged in on the condition that the activity must be compatible with the PAHO Code of Ethics and the mission of the Organization.
- External publications authored or co-authored by PAHO personnel and for which no remuneration will be received do not require ETH approval and are governed by Chapter 8 of the PAHO E-Manual.

Responsible communications

430. PAHO personnel must communicate responsibly and with tact, discretion, and good judgment in both official and personal communications, including on private social media accounts and all other forms of communication, including digital communication. PAHO personnel must not speak on behalf of the Organization, present personal views as those of the Organization, or otherwise imply institutional endorsement unless authorized to do so.

440. PAHO personnel must protect confidential, sensitive, privileged, and other non-public information, and must not disclose or use such information except as authorized and for legitimate organizational purposes. In all public and external communications, including personal social media activity, PAHO personnel must refrain from misrepresentation; respect the Organization's independence, impartiality, and reputation; and ensure their communications are consistent with applicable policies, including the social media policy.

450. As international civil servants, PAHO staff must ensure that their personal communications do not adversely affect their official duties, reflect poorly on their status as international civil servants, or call into question their loyalty or responsibility to the Organization.

460. External inquiries, including media inquiries, must be referred to the appropriate PAHO communications resource. Personnel who manage institutional accounts or are otherwise authorized to communicate externally on behalf of PAHO can do so only within the scope of their authority and in accordance with applicable PAHO communications requirements.

Artificial intelligence

470. PAHO personnel must follow the policy and guidelines on the ethical use of emerging technologies, including the use of artificial intelligence.

Work arrangements

480. Where telework or other flexible work arrangements are authorized, PAHO personnel are accountable for the same standards of conduct, performance, availability, information protection, and care of PAHO assets that apply in on-site work settings, in accordance with applicable policies.

Relations with external parties

490. PAHO personnel must, at all times, conduct themselves in a manner that protects the Organization's integrity, independence, and reputation in external interactions.

500. In all instances, they must ensure that procurement actions comply with PAHO's Procurement Procedures Manual (SOP 6.1.2 *Procure Goods and Services*). For questions regarding contracting situations that may affect, or be perceived as affecting, objectivity or impartiality, consult with any of the ICMS ethics resources.

Due diligence

510. PAHO exercises due diligence in its relationships with vendors, partners, and other stakeholders. PAHO personnel involved in such relationships must act in accordance with applicable procurement, due diligence, and partner engagement requirements and promote integrity, accountability, and compliance in contractual and working arrangements.

Anti-fraud and anti-corruption

520. PAHO prohibits fraud, corruption, bribery, and other improper conduct involving organizational resources or decision-making. PAHO personnel must neither offer nor accept any improper advantage and must report suspected fraudulent or corrupt activity through appropriate channels.

Gifts, entertainment, and hospitality

530. PAHO personnel cannot give, solicit, or accept gifts, entertainment, hospitality, or other benefits that could improperly influence, or appear to influence, their independence, objectivity, or decision-making. Any exchange of such benefits in a work-related context must comply with applicable PAHO policies and standards.

540. Giving gifts to or accepting gifts from other persons working in PAHO is acceptable only if each of the following circumstances is satisfied:

- PAHO personnel are not in a supervisor-supervisee relationship. PAHO personnel may, however, give gifts appropriate to the occasion to their supervisor or accept gifts from individuals they supervise:
    - In recognition of infrequently occurring occasions of special or personal significance, such as marriages, illnesses, or births or adoptions of children; or

- Upon occasions that terminate the supervisor-supervisee relationship, such as retirements, resignations, or transfers.

- There is a personal relationship between the individuals that would justify such gifts; and
- Gifts are of minimal value.

Interactions with governments

550. In dealings with governments, PAHO personnel must maintain independence, impartiality, and political neutrality and not seek or accept assistance or influence that could compromise the Organization's decision-making or their status as international civil servants.

Acting responsibly in the global community

Human rights

560. PAHO upholds internationally recognized human rights standards in its work and relationships. PAHO personnel must treat all persons with dignity, respect, and equality, and never contribute to human rights abuses. PAHO personnel must raise concerns through appropriate channels where such risks or violations are identified.

Political activities

570. PAHO personnel, in alignment with the ICSC's Standards of Conduct for the International Civil Service, may exercise private civic rights where permitted; however, they may not engage in political activities or public expressions that could compromise, or appear to compromise, the Organization's independence, impartiality, or neutrality.

Environmental responsibility

580. PAHO is committed to environmentally responsible operations. PAHO personnel support this commitment by using resources responsibly and by complying with applicable organizational measures intended to reduce environmental impact.

Resolving conflicts and reporting misconduct

Integrity and Conflict Management System (ICMS)

590. PAHO personnel can obtain assistance in addressing workplace-related concerns and grievances through the ICMS's offices, advisory bodies, and mechanisms, which are designed to promote a coherent and structured approach to integrity and conflict resolution across the Organization.

600. The ICMS offers various resources to address ethical issues and workplace concerns, including the Ombudsperson, ETH, HRM, INV, the Office of the Legal Counsel (LEG), and the PAHO Staff Association.

610. The ICMS operates through coordination mechanisms to promote consistency and avoid duplication across its various entities, while also providing multiple entry points that allow personnel to choose the most appropriate channel to raise concerns based on their nature.

Reporting concerns

620. INV is the Organization's primary mechanism for reporting misconduct. Reports can be made anonymously or non-anonymously through the Speak Up! Reporting Portal or by email to investigations@paho.org. All reports of misconduct are handled by INV in accordance with the PAHO Investigation Protocol.

630. The Organization has several resources and channels for speaking up and seeking guidance on issues and concerns not related to misconduct, including supervisors or managers; ETH; the Ombudsperson; LEG; HRM; and the PAHO Staff Association. PAHO strives for a culture of openness where everyone can raise questions freely and without reservation.

Responsibility for this Code

640. ETH is responsible for administering this Code. For any questions or further information regarding this Code, contact ethics@paho.org.

Related documents

POL 1.6.5 Investigation Protocol
POL 3.6.27 PAHO Telework Policy
POL 3.11.6 PAHO Policy on the Prevention and Resolution of Harassment in the Workplace

POL 3.11.7 Preventing and Responding to Sexual Misconduct
POL 3.14.4 Health, Safety and Well-Being of PAHO Personnel
POL 5.1.2 Records Retention
POL 5.2.7 Social Media Use
POL 8.6.1 Copyright Principles
POL 12.14.1 Fraud Policies and Reporting of Suspected Fraud
POL 13.2.6 Asset Accountability Policy
POL 14.2.1 Information Security Policy and Principles
POL 14.3.2 Generative Artificial Intelligence
POL 15.7.01 Personal Data Protection
SOP 6.1.2 Procure Goods and Services PAHO Staff Regulations and Rules
ICSC Standards of Conduct for the International Civil Service

Last reviewed by policy owner 31 August 2026.