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Ethics and Accountability at CSIS

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1. CSIS Ethics Framework

A. CSIS STATEMENT ON ETHICS AND ACCOUNTABILITY

CSIS adheres to the highest standards of ethics and accountability. As a non-profit, nongovernmental 501 (c)(3) organization, we pride ourselves on honest and independent analysis and policy-relevant work. Our mission is to provide strategic insights and bipartisan policy solutions to the world's greatest challenges.

CSIS represents no outside interests. We hire experienced and innovative scholars and former government and private-sector officials to conduct analytic research and develop policy prescriptions. These scholars work with a broad array of stakeholders inside and outside government, in the public and private sector, and within the United States and internationally to develop CSIS findings and recommendations.

Our scholars' reports, testimony, speeches, and commentary are the product of their research, and are theirs alone. CSIS as an institution does not take policy positions, engage in political activity, or lobby lawmakers or other government officials. All funders are told explicitly that they will have no role in shaping CSIS analysis or dictating CSIS recommendations. Our reputation is based on the quality and independence of our scholars' work, as well as our ability to help policymakers, the media, and the public at large understand the most complex foreign, economic, energy, and defense policy issues of the day.

CSIS has a long-standing set of policies and guidelines governing ethics and accountability. Given the growing demand for greater transparency and disclosure of think tank operations, the CSIS Board of Trustees is making the institution's guidelines and policies on ethics and accountability available for public review.

While we periodically update these policies and guidelines to comply with new laws or directives, three fundamental principles have guided CSIS's work for five decades: **(1) bipartisanship; (2) scholarly independence; and (3) analytic rigor.** We hold ourselves to the highest ethical standards and integrity and understand that the public has a right to know what guides our work.

B. ROLE OF GOVERNANCE IN ENSURING ETHICAL BEHAVIOR

CSIS is governed by an independent and nationally prominent Board of Trustees that serves as the foundation of our ethics and compliance program. The CSIS Board of Trustees oversees all aspects of the Center's work, including its finances and business operations, fundraising, programmatic effort, risk management, and compliance with government rules and regulations. The Board meets twice each year, with committee meetings occurring on a frequent basis in the interim.

The Executive Committee of the Board meets three times per year to oversee the work of CSIS, reviewing the Center's finances, programming, fundraising, and operations.

Members of the Executive Committee of the CSIS Board of Trustees are in regular communication with CSIS management throughout the year on the issues set forth below.

The **CSIS Finance Committee** plays a particularly important role in assuring the integrity of the Center’s finances. The CSIS Finance and Audit Committee meets quarterly with CSIS management. The auditing firm McGladrey LLP audits CSIS’s financial statements on a yearly basis. The Finance Committee meets regularly with CSIS’s outside auditors, including in executive sessions that do not include CSIS management. The Finance Committee also oversees CSIS’s enterprise risk management efforts designed to protect the institution and ensure that policies and procedures are followed.

The CSIS Audit and Compliance Committee plays an important role in assuring the integrity of the Center’s programmatic work. The CSIS Audit and Compliance Committee meets on a regular basis with CSIS management. The Audit and Compliance Committee helps CSIS management to evaluate complex programmatic issues as they arise, including the establishment of appropriate standards for contributions to CSIS. While Board members participate in CSIS task forces and commissions, they do not typically initiate projects at CSIS. That is the purview of CSIS management and program directors.

C. MEETING ALL LEGAL REQUIREMENTS

CSIS was founded in 1962 as a center within Georgetown University. In 1987, CSIS became an independent, not-for-profit organization. As a formally chartered not-for-profit, CSIS is legally permitted to receive contributions from individuals, corporations, nonprofit organizations, foundations, and government entities.

CSIS is required by law to comply with a broad range of legal and regulatory reporting requirements. For instance, CSIS makes available to the public its **Form 990**, which is submitted annually to the Internal Revenue Service.

In addition, CSIS also submits yearly reports to various government agencies addressing issues of nondiscrimination, affirmative action, benefit plan administration, and census data to the Department of Labor and Census Bureau.

CSIS administers its federal grants in accordance with the uniform guidance in the Code of Federal Regulations and its federal contracts in accordance with applicable provisions of the Federal Acquisitions Regulation. CSIS has established policies to ensure compliance with its federal grant and contract requirements, as well as training and procedures for ongoing review and monitoring. In addition, CSIS engages an external auditor to perform the required A-133 audit when the total annual federal award expenditures exceed the specified threshold in a given year.

As a recipient of federal contracts, the Defense Contracting Audit Agency (DCAA) also maintains the right to conduct its own audit at its discretion.

D. MAINTAINING THE HIGHEST STANDARDS OF FINANCIAL INTEGRITY

CSIS adheres to the highest standards with regard to its financial management and its efforts to comply with legal, regulatory, and ethical requirements and to remain consistent with nonprofit industry best practices. This includes having established policies and procedures, adequate staff training and development, strong internal controls, and a process for review and monitoring by management.

CSIS maintains a set of accounting policies and procedures to ensure timely, accurate, and reliable financial reporting. CSIS records its transactions and presents its financial statements in conformity with Generally Accepted Accounting Principles (GAAP). In addition, CSIS's financial statements are audited annually by an independent external auditor who reports its findings directly to the CSIS Finance Committee.

CSIS has an established system of internal controls to prevent and detect error and fraud that could result in the misappropriation of assets or material misstatement in its financial reporting. These internal control policies and procedures are documented and reviewed annually by management, in addition to periodic monitoring to ensure their effectiveness. Furthermore, CSIS's internal controls are documented and evaluated for their effectiveness by external auditors as part of the annual financial statement audit.

No contributions to CSIS are accepted in cash. All contributions or payments must be received either by check or bank transfer. CSIS has no foreign bank accounts.

2. How We Work with Donors to CSIS

A. INVIOABILITY OF CSIS'S INDEPENDENCE

CSIS has stringent internal guidelines and procedures involving the acceptance of donations. CSIS retains exclusive control over the intellectual content and direction of projects, proposals, and activities. CSIS does not represent any donor before any government office or entity, including congressional lawmakers and executive branch officials.

As a 501(c)(3) organization, we are prohibited from lobbying. Federal law also prohibits CSIS from acting at the request, direction, or control of foreign governments without registering as a foreign agent under Foreign Agents Registration Act (FARA) guidelines.

B. CSIS REVIEW PROCEDURE FOR DONORS

CSIS both solicits financial support and receives offers of support from contributors. There are two basic types of financial support: (1) general support that is not tied to specific projects; and (2) specified support linked to specific projects. General support to CSIS comes from individuals and corporations (and rarely foundations) for the broad support of CSIS as an institution. These contributions are not tied to any specific project or proposal. For support of this nature, the donor seeks to promote CSIS as an institution that undertakes bipartisan, centrist involvement in the policy deliberations of Washington. These donors support CSIS because they want to sustain a constructive, bipartisan voice in policy formulation. We review all donors to ensure they support CSIS stated principles, that they are recognized leaders in professional circles, that the funds are contributed from legitimate and honorable sources, that they have constructive standing in U.S. and international policy communities, that they do not espouse policy positions antithetical to broad U.S. interests, and that the donor understands CSIS's prohibition on lobbying and representation.

Donors who seek or are asked to provide funding for specific projects or proposals are reviewed according to a different process. All contributions for specific projects are governed by a written memorandum of agreement, grant, or contract. An internal review within CSIS—separate from that of the program director—considers the broad objectives of the project to ensure that the project is a broad public policy matter and not a private parochial concern. Senior CSIS management meets with donor representatives as needed to review the project goals and outline CSIS criteria, including its independence. The senior management team reviews with the program director, the structure of the project, and the products anticipated in the course of project implementation. This team independently reviews the role of the donor in the policy deliberations in Washington to assess reputational risk. Any concerns are brought to the president & CEO, who in turn can take the project to the Audit and Compliance Committee of the Board.

C. ACKNOWLEDGMENT OF DONORS TO CSIS

Current law does not require CSIS or any 501(c)(3) organization to disclose its donors in a public manner beyond the IRS 990 requirement. However, CSIS recognizes that as a private institution trying to educate government officials, the media, and the public at large on public policy issues, it has a responsibility to ensure that none of its work contains a conflict or bias.

CSIS provides on an annual basis a complete list of donors for the most recent completed fiscal year, which can be found [here](#). CSIS updates this list of donors in its annual report, as well as on its website on a yearly basis.

As mentioned above, some donations to CSIS are intended for general support of the Center’s activities and operations. Other donations are provided in support of specific projects, events, or initiatives. CSIS identifies in its project reports those donors who contributed funding for a particular study. We also indicate direct sponsorship for events, whether public or private.

As a general policy, CSIS does not accept anonymous donations. There are occasions when CSIS will make rare exceptions to this policy. For example, some individual donors have a policy of not disclosing their charitable giving. Exceptions to this policy are discussed and decided with the Audit and Compliance Committee of the Board of Trustees. In such cases, CSIS will designate in its annual list of donors anonymous donations, the total amount of money contributed from anonymous sources, and the percentage of total giving to CSIS that this represents.

D. REPRESENTING CSIS’S INDEPENDENCE TO DONORS IN CONTRACTS AND AGREEMENTS

In cases where a donor is providing direct support for a CSIS program, project, event, or any other initiative, the CSIS-donor relationship must be established and governed by a contract, grant agreement, or memorandum of understanding that establishes the independence of CSIS. While there is no assumption on CSIS’s part that donors intend to exercise undue influence through their support, these agreements contain the following language:

Legal restrictions. CSIS is an independent and bipartisan research institution. As such, and as in the case of all donations to CSIS, CSIS will retain total discretion regarding the use of funds, subject only to our commitment to use these funds for the specific use of supporting the project described in the enclosed proposal. There can be no conditions or limitations on its independence in research, findings, conclusions, or resulting publications. CSIS retains final decisionmaking authority regarding program and project research topics, speakers, and participants in activities and on the contents of reports. Where appropriate, CSIS scholars will consider input from donors regarding these issues.

CSIS shall not appear before any U.S. government official specifically to make a case on behalf of a donor's interests or position relating to policy matters, administration of law, or issues of public interest, nor shall CSIS function directly or indirectly as a donor's representative or agent to the public at large. CSIS will not take any action that might jeopardize CSIS's independence and status as an educational institution.

CSIS also has established internal processes to insure objectivity regarding policy conclusions and recommendations.

First, every project agreement at CSIS is reviewed by an internal management committee, composed of CSIS's executive vice president, the vice president for programs and institutional relationships, the chief financial officer, the chief development officer, and the senior vice president for external relations in order to ensure that no project is formulated in a way that could call into question CSIS's objectivity. Questions raised by this group are discussed with CSIS's president & CEO and CSIS's Audit and Compliance Committee of its Board of Trustees, if necessary. This team continues to monitor projects throughout their execution to ensure that they adhere to standards of independence.

Second, if a CSIS scholar believes a donor is trying to unduly influence or steer toward a particular outcome, that scholar must report the activity to CSIS's executive vice president, who then decides the appropriate response. This can include warning the donor, review by the president & CEO and the Audit and Compliance Committee of the Board, or withdrawal from the project.

CSIS has and will terminate a project (and return the donor's contribution, net of expended costs) when it believes a donor will not honor CSIS's independence.

E. POLICIES GOVERNING HOW CSIS EXPERTS WORK WITH U.S. GOVERNMENT OFFICIALS

CSIS scholars routinely interact with U.S. government officials, most often at the officials' request. CSIS scholars, for instance, are frequently invited to testify before committees of the U.S. Senate and House of Representatives and brief executive branch officials.

CSIS scholars testifying before Congress must include the following disclosure at the outset of their testimony: "The views contained in this testimony are mine alone and do not represent the views of the Center for Strategic and International Studies."

CSIS scholars comply with all disclosure requirements stipulated by Congress in conjunction with their testimony and will continue to comply with any additional requirements that may come into force in the future.

CSIS scholars are frequently asked to brief U.S. government officials (legislative and executive branches). If a CSIS scholar or officer seeks the meeting, he/she must identify

to the government office if the meeting is in conjunction with any ongoing project of the Center and who is funding the project. CSIS scholars and officers shall not represent any party (individual, corporation, foundation, or foreign government) before a government official and shall not seek meetings on behalf of any other party.

CSIS may undertake project work funded by the U.S. government. As mentioned above, as a nonprofit organization, CSIS's federal grants are subject to Office of Management and Budget (OMB) circulars, and its federal contracts are subject to relevant provisions of Federal Acquisition Regulation (FAR), where applicable. CSIS has policies and procedures to review and monitor the compliance requirements of its federal grants and contracts. In addition, CSIS engages an external auditor to perform the required A-133 audit if and when annual federal award expenditures exceed the specified threshold in a given year.

CSIS regularly invites government officers to participate in projects that are not funded by the U.S. government. The purpose of these invitations is to solicit the thinking and ideas of U.S. government experts in order to improve the quality of CSIS's work. In cases where specific project support has been provided by a donor, CSIS scholars must make clear who is funding the activity in order for government officials to receive proper authorization to participate from their supervising authorities.

CSIS does not undertake classified work unless stipulated by a government grant or contract and then only in appropriate facilities provided by the U.S. government. CSIS does not maintain clearances for employees and is not a National Industrial Security Program Operating Manual (NI-SPOM) facility. CSIS employees do not handle any classified material on CSIS premises.

F. POLICIES GOVERNING THE ACCEPTANCE OF FOREIGN GOVERNMENT AND CORPORATE SOURCES OF FUNDING

CSIS receives both general support and specific project support from corporations and foreign governments.

Corporations provide on average between a quarter and a third of CSIS's revenue in a given fiscal year. This revenue primarily derives from U.S. corporations.

CSIS does not advocate for a narrow issue of parochial interest to the corporation, nor to promote a particular answer or policy outcome. While CSIS scholars work with donors to agree on areas of inquiry, as with all work at CSIS, the outcomes are determined solely by the scholars.

As mentioned elsewhere in this document, CSIS has policies to ensure that CSIS products address broad public policy concerns and not parochial matters. CSIS scholarship is not proprietary to any corporation, in accordance with our 501(c)3 status.

As noted above, CSIS scholars and officers are not permitted to represent a corporation's interests with U.S. lawmakers or executive branch officials.

A small percentage of CSIS's overall revenue (roughly 5 percent in FY 2013) is derived from foreign government sources for general support or program and project work. CSIS has procedures in place to ensure this work is not used to promote foreign government interests with U.S. government officials.

All projects must be governed by an agreement with language establishing CSIS's independence. Foreign governments fund analytic studies and programs that seek to address broad policy questions. The full list of foreign government funders is found within CSIS's donor listing, [here](#). An equal percentage of foreign government funding (roughly 5 percent of CSIS total revenue in FY 2013) is related to executive education programs. These programs do not deal with contemporary policy matters. The educational program is designed exclusively by CSIS scholars.

In these instances, CSIS scholars help to educate young, rising foreign diplomats and officials, typically from allied and partner nations of the U.S. government, in order to help them understand Washington perspectives on foreign policy issues. As part of these training programs, CSIS may conduct skills-building activities with some foreign officials—including writing, briefing, and strategic thinking—in order to help build the capacity of allies and partner nations.

3. Associated Policies to Safeguard Ethics and Accountability at CSIS

A. AVOIDING PLAGIARISM

CSIS's reputation as a policy research institution depends upon the professionalism and integrity of its written product. Plagiarism—the wrongful appropriation of another author's language or ideas and representation of these ideas as one's own original work—is not tolerated at CSIS. All staff adhere to strict standards when it comes to properly and precisely attributing intellectual content.

Accusations of misconduct are brought to a supervisor's or a corporate officer's attention, who in turn bring it to the attention of CSIS's executive vice president (EVP). If the allegations have merit, the EVP convenes a Plagiarism Review Committee (PRC) that consists of no fewer than three senior staff members, inclusive of both program directors and corporate officers. The EVP informs the accused of the charges without necessarily disclosing the identity of the complainant.

The PRC conducts an inquiry into the matter to determine whether the allegation has merit.

Within 30 days, the PRC reports with its recommendation. This recommendation could include, in order of severity:

- The matter be terminated on the grounds that no misconduct or serious error was committed and there be no permanent record;
- The matter constitutes a serious error, but not willful misconduct; and
- The matter constitutes willful misconduct.

If the finding has merit, the PRC provides a recommendation on the severity of the sanctions to be imposed. These could include, but are not limited to, the following, in order of increasing severity:

- Letter of reprimand
- Special monitoring of future work
- Probation
- Suspension
- Termination of employment

The PRC makes a recommendation to CSIS's president & CEO who adjudicates the case. Once the respondent is informed of the judgment, he or she has the right of appeal to the Audit and Compliance Committee of the Board of Trustees.

All proceedings and information collected are held in the strictest confidence to protect the reputations of all parties.

B. AVOIDING CONFLICTS OF INTEREST

CSIS permits full-time, resident staff to earn additional income outside of CSIS. They are allowed to do so provided they honor two fundamental principles. First, staff must give CSIS the full measure of their commitment. Second, staff must be responsible for anticipating both real and perceived conflicts of interest and taking active measures both to disclose them to senior management and to avoid or mitigate them.

A conflict of interest is when a CSIS employee engages in a relationship—included but not limited to a financial relationship—with an outside business or foreign entity in a manner that could jeopardize the independence of CSIS's work. Here, even the perception of a conflict of interest could be damaging and must be avoided.

Avoiding conflicts of interest depends first upon good judgment. Staff must remain vigilant about the perception that outside entities may be seeking to influence the outcome of a CSIS study. Staff are asked to avoid the perception that they could in any way seek to profit from CSIS's reputation and relationships. CSIS's success depends on its reputation for high-quality, independent work.

CSIS requires all employees who engage in outside business to submit an Outside Business Disclosure statement upon hire, on a yearly basis, and whenever significant changes occur. Staff are expected to pre-clear any relationship that might raise an appearance of a conflict.

The Outside Business Disclosure statement requires accurate descriptions of all financial relationships involving a donor to CSIS or a foreign entity and the description of other financial relationships that exceed \$10,000 in income in a single calendar year. It also requires reporting on the financial relationships of staff spouses and relevant dependents in cases where those could present possible conflicts for CSIS.

This includes but is not necessarily limited to consultancy work, foundation or government support, partnerships, board or teaching appointments, or speaking income from a single source. It also includes those investments or ownership interests that could potentially conflict with CSIS activity. All information provided is protected and considered privileged information by CSIS management.

A Conflict of Interest Review Panel designated by CSIS's president & CEO and led by the executive vice president convenes when necessary to discuss potential violations and help advise staff on compliance. The panel has the authority to conduct further inquiries. The panel can rule that an activity is consistent with CSIS policy; inconsistent with CSIS policy and ask a staff member to curtail or amend outside activity; recommend disciplinary action; or send the case to the president & CEO for consideration. Staff can appeal rulings to the president & CEO, who then determines whether to render a decision or refer the case to the Audit and Compliance Committee of CSIS's Board of Trustees.

This policy is meant to protect staff and CSIS and to ensure a transparent and fair process that respects the sensitivity of external relationships. In cases where staff have committed wrongdoing, this policy helps to preserve the credibility of the institution. In cases where staff have been falsely accused of wrongdoing, this policy demonstrates that the case has been reviewed and the situation deemed acceptable.

C. SPECIAL RESTRICTIONS ON THE PRESIDENT & CEO

Special procedures and restrictions are in place for CSIS's president & CEO since he or she serves as the face of the organization. CSIS's president & CEO must not give speeches or make appearances for personal gain. All honoraria must be provided and recorded as contributions to CSIS.

The president & CEO may serve on corporate boards or advisory committees, but these must be approved in advance by the Executive Committee of CSIS's Board of Trustees. If the corporate affiliation involves a donor to CSIS, the president & CEO is prohibited from personal involvement in soliciting funding or directing anyone else to solicit funding related to CSIS work. In such a case, these functions will be handled exclusively by CSIS's senior management team without the involvement of the president & CEO, reporting directly to a designee on CSIS's Board of Trustees.

CSIS's president & CEO is permitted to serve on public advisory boards, but in such cases he or she is then prohibited from involvement in soliciting funding for CSIS's projects funded by the affiliated government entity. For example, because of the current president & CEO's role as chairman of the Defense Policy Board, he may not be involved in any way in soliciting funding from the Department of Defense, nor encourage anyone else to do so. These functions must be handled exclusively by CSIS's senior management team without the involvement of the president & CEO, reporting directly to CSIS's Board designee.

CSIS's president & CEO may not participate in partisan political activity, even in a private capacity.

D. ACCEPTABLE POLITICAL ACTIVITY

CSIS does not engage in partisan political activity. CSIS's 501(c)(3) tax status forbids the institution from participating in any campaign for elected public office. This means that CSIS may not take an institutional position for or against any political candidate and may not permit its resources, including the on-the-job time of its salaried employees, to be used in an electoral campaign.

In their CSIS capacity, CSIS staff are permitted to provide analysis and recommendations on matters of public policy to public officials and candidates for public office, so long as this work is not exclusive to one party or candidate.

CSIS staff members are permitted to support political campaigns in their personal capacity. If CSIS staff members advise candidates in a fashion that constitutes or connotes support for those candidates, staff members do so in their personal capacity, outside of their time at CSIS, and without use of CSIS resources, including CSIS phones, computers, and facilities.

Staff members may request or be directed to take a leave of absence if their political activities interfere with, or take significant time away from, their CSIS obligations. All CSIS employees are permitted to contribute financially to political candidates within the legal limits, but it is not permissible for CSIS staff members to fundraise for a candidate in a way that could be interpreted as CSIS support for a particular campaign.

When CSIS staff members do work on behalf of a political campaign, they make clear that they are acting as individuals and not on behalf of CSIS. CSIS staff are identified publicly in only one of two ways—as a CSIS expert without political affiliation, or as an adviser to a campaign who is not identified as a CSIS expert. CSIS staff must disclose to reporters, editors, and event moderators their proper affiliation prior to their talk, published article, or interview.

In order to avoid unexpected surprises, CSIS staff members who are playing a substantial role in a political campaign—if they are compensated, have a formal title or relationship with access to privileged information, or are acting as a public surrogate—must disclose this information to CSIS’s designated ombudsperson for political activity, currently the executive vice president, in written form. The role of the ombudsperson is to answer any questions CSIS staff may have regarding campaign-related activity, as well as to work with senior management and the president & CEO to answer relevant questions to the media and public.

Conversations with the ombudsperson are considered confidential, but he or she will inform CSIS’s president and/or CSIS’s corporate officers and the Audit and Compliance Committee of the Board of Trustees, if appropriate, with the scholar’s consent, of issues that may require further consultation.

E. STANDARDS FOR VISITING FELLOWS, AFFILIATES, CONSULTANTS, AND INTERNS

CSIS has a number of nonemployees associated with the institution. At any given time, a limited number of visiting fellows from U.S. government entities are resident at CSIS, as well as foreign public and private-sector officials. We also have a range of nonresident affiliates on two-year terms. In addition, CSIS has a robust population of interns throughout the year, particularly during summer.

Visiting fellows have offices at CSIS and associate with a specific CSIS program during their fellowship. Typically, these visiting fellows are paid by their host institutions. They are required to identify their host institutions in any meeting with external participants. Visiting fellows are not permitted to represent the interests of their host

institution during the terms of their fellowship without permission of the program director and CSIS management. Visiting fellows understand these guidelines, attest to their willingness to abide by them, and are overseen by CSIS program directors through the course of their fellowships.

CSIS has a number of nonresident, nonsalaried affiliates—senior associates or senior advisers. The full list can be found [here](#). Affiliates are required to share in advance all public-facing work they produce in CSIS’s name with the CSIS program director to whom they are affiliated. Affiliates agree to act in accordance with CSIS’s conflict of interest and political activity guidelines.

CSIS on occasion has non-employee, non-affiliated consultants author reports in cooperation with our programmatic activity, under the supervision of our program directors. These consultants who publish in CSIS’s name must disclose any conflicts of interest that may exist. For that matter, any outside actor who writes for CSIS—whether in print or electronic—must adhere to the same standards that govern op-ed submissions to major newspapers, where they must self-report any possible conflicts in advance.

CSIS interns agree to abide by all ethics and accountability guidelines as CSIS staff. Interns receive the same ethics training as full-time staff.

F. WHISTLEBLOWER PROTECTION

CSIS maintains a set of procedures related to reporting improper or questionable activity and extends whistleblower protection to all of its employees. Any CSIS employee who discovers and reports suspected irregularities during their period of employment with CSIS will be protected from reprisal. Currently CSIS’s designated ethics and compliance officer, including for whistleblower protection, is its executive vice president.

The Human Resources team will take appropriate action to investigate any allegations and provide feedback to the reporting employee. This team will also ensure that a reporting employee continues to receive the protection from retaliation or intimidation offered under this policy throughout his or her employment. Any employee who engages in such retaliation or intimidation is subject to discipline up to and including termination.

G. POLICIES ON NON-HARASSMENT

CSIS is committed to providing a work environment that is professional and free from intimidation, hostility, or other offenses. Harassment of any form is not tolerated. This includes instances of verbal, physical, or sexual harassment. Every new hire is oriented on our prevention of harassment policy and required to adhere to its terms.

At CSIS, we believe that every employee has a responsibility for keeping the work environment free of harassment. Employees who become aware of an incident of harassment, whether by witnessing the incident or otherwise, are obligated to report it. Supervisors are responsible for ensuring that all employees under their supervision are protected from harassment in the workplace. Senior management is charged with ensuring that employees filing complaints are not subject to adverse personnel decisions or any other known form of reprisal.

The full prevention of harassment policy is available [here](#).

G. POLICIES ON NONDISCRIMINATION

CSIS cultivates a work environment that emphasizes the value and dignity of each individual. It is respect for individuals that forms the underpinning of all our standards, policies, and actions.

All personnel actions and decisions (recruitment, employment, compensation, benefits, training, professional development, promotions, retentions, transfers, demotions, terminations, and layoff practices) are based on valid job-related factors without regard to race, color, national origin, ancestry, gender, sexual orientation, age, religion, creed, physical, mental disability, marital status, veteran status, political affiliation, or any other factor protected by law.

Management is responsible for ensuring that the Center's equal opportunity policies are implemented; however, all members of the staff share in the responsibility of assuring that, by their personal actions, the policies are effective and applied uniformly.

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