

PMI GHANA ETHICS GOVERNING MANUAL

(Version 1.0 – August 2025)

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1. Introduction and Mandate

PMI Ghana reaffirms its unwavering commitment to the highest ethical standards in project management. This manual is grounded in the **PMI Code of Ethics and Professional Conduct**, aligned with **PMI Ghana's Bylaws**, and consistent with **Ghanaian laws, including the Data Protection Act (2012) and Corporate Governance Guidelines**.

As a **chartered professional body duly recognized under Ghanaian law**, PMI Ghana provides this manual to ensure **ethical, transparent, and responsible conduct** by all individuals associated with its activities, thereby strengthening public trust and professional credibility.

2. Purpose and Scope

Purpose

- Cultivate a **culture of integrity, accountability, fairness, and transparency**.
- Provide **clear guidelines** for ethical decision-making, reporting, and enforcement.
- Strengthen **trust and confidence** among members, stakeholders, and the public.

Scope

This manual applies to:

- **All PMI Ghana members, credential holders, and volunteers.**
- **Board members, staff, and chapter leaders.**
- **PMI Certified professionals but not PMI Ghana members.**
- **Vendors, consultants, and partners engaging with PMI Ghana programs.**

3. Key Definitions

- **Conflict of Interest** – A situation where personal, financial, or political interests compromise professional judgment.
- **Ethical Misconduct** – Any action or omission violating this manual or the PMI Code of Ethics.
- **Facilitation Payment** – A prohibited payment intended to expedite routine actions.
- **Whistleblower** – An individual who, in good faith, reports unethical or unlawful conduct.
- **Stakeholders** – Individuals or groups affected by PMI Ghana’s activities, including members, volunteers, regulators, and the public.
- **Retaliation** – Any adverse action (e.g., harassment, demotion, or exclusion) taken against a whistleblower or ethics reporter.
- **Misuse of Authority** – Use of positional power for personal, financial, or political gain.
- **Ethics Committee** – A standing committee mandated to oversee ethical compliance, investigation, and reporting.

4. Core Ethical Values

PMI Ghana adopts the following **non-negotiable values**:

- **Responsibility** – Taking ownership of decisions, actions, and their consequences.
- **Respect** – Valuing people, property, cultures, and diverse opinions.
- **Fairness** – Making impartial, transparent, and unbiased decisions.
- **Honesty** – Communicating truthfully, accurately, and in good faith.

5. Ethical Standards of Conduct

5.1 Responsibility

- Accept only assignments within personal competence.
- Honour commitments and deliver on promises.
- Report and correct unethical behavior or mistakes promptly.
- Safeguard confidential and proprietary information.

5.2 Respect

- Maintain professionalism under all circumstances.
- Avoid gossip, defamation, or undermining colleagues.
- Respect diversity, equity, and cultural norms.

5.3 Fairness

- Avoid conflicts of interest; disclose transparently if unavoidable.
- Reject favouritism, nepotism, bribery, or facilitation payments.
- Ensure fair treatment and promote **equal access** to opportunities for women, youth, and marginalized groups.

5.4 Honesty

- Provide accurate, complete, and timely information.
- Avoid manipulation, deception, or omission of critical facts.
- Give due credit; avoid plagiarism or false claims.

5.5 Navigating Ethical Dilemmas

When in doubt, follow this **Ethical Decision-Making Framework**:

- Assess** – Define the ethical issue and facts.
- Consult** – Seek guidance from the Ethics Manual, Ethics Committee, or Ethics Champions.
- Evaluate** – Reflect on PMI values (Responsibility, Respect, Fairness, Honesty).
- Decide** – Choose the action that best upholds integrity and transparency.
- Act** – Implement the decision and document key steps for accountability.

6. Ethical Leadership Obligations

Leaders must **set the tone at the top** by:

- Serving as role models through ethical consistency.
- Promoting ethics awareness across all PMI Ghana programs.
- Escalating ethics concerns without bias or delay.
- Avoiding misuse of authority for personal, financial, or political gain.

7. Conflicts of Interest

- All real or perceived conflicts must be disclosed to the Ethics Committee immediately.
- Board members, Operational Executives, Staff and Volunteers must recuse themselves from decisions involving personal interest.
- Conflicts must be documented and resolved transparently.

8. Data Ethics, Confidentiality, and Cybersecurity (Enhanced)

- Use stakeholder data solely for **non-commercial PMI-related purposes**.
- Comply strictly with **Ghana Data Protection Act** and **PMI Global policies**.
- Adhere to **minimum cybersecurity standards (ISO 27001 recommended)** to protect digital records.
- Obtain **informed consent** before sharing or publishing personal data.

9. Ethical Expectations for Practitioners

Project managers and professionals shall:

- Embed ethics in **procurement, budgeting, monitoring, and reporting**.
- Reject all forms of bribery, facilitation payments, and kickbacks.

- Align projects with **sustainable, equitable, and inclusive outcomes**.
- Adhere to **Non-Disclosure and Intellectual Property Protection Agreements** before sharing or distributing sensitive information.

10. Non-Disclosure and Intellectual Property Protection Agreement

a) Definitions

- **Confidential Information (CI)** means all non-public, proprietary, technical, financial, or business information disclosed in any form (oral, written, electronic, or otherwise) that is designated as confidential or that a reasonable person would understand to be confidential given the nature of the information and the circumstances of disclosure.
- **Intellectual Property (IP)** includes, but is not limited to, trade secrets, proprietary methods, processes, designs, drawings, specifications, software, data, inventions (patentable or not), copyrights, and trademarks.

b) Non-Disclosure Obligations

- The Receiving Party shall not disclose Confidential Information to any third party, including multiple contractors or vendors, without the prior **written consent** of the Disclosing Party.
- Disclosure is permitted strictly on a **need-to-know basis** and solely to individuals or entities directly engaged in the execution of the agreed contractual scope.
- The Receiving Party shall take all reasonable measures to ensure that any authorized recipients comply with the confidentiality obligations set forth herein.

c) Use Restrictions

- Confidential Information and Intellectual Property shall be used solely for the performance of the contractual obligations and for no other purpose, whether commercial, competitive, or otherwise.
- The Receiving Party shall not copy, reproduce, reverse-engineer, decompile, or otherwise use Confidential Information to develop competing products or services.

d) Ownership and Rights

- All Confidential Information and Intellectual Property disclosed shall remain the sole and exclusive property of the Disclosing Party.

- No license or other rights to the Confidential Information or Intellectual Property are granted or implied by this Agreement, except as expressly provided in writing.

e) Legal Remedies

- Any unauthorized disclosure or misuse shall constitute a **material breach** of contract, entitling the injured party to seek immediate **injunctive relief**, damages, legal costs, and any other remedies available under applicable laws, including Ghana's **Copyright Act, 2005 (Act 690)** and **Data Protection Act, 2012 (Act 843)**.

f) Survival

- These confidentiality and intellectual property protection obligations shall survive the termination or completion of the contractual relationship for a period of **five (5) years**, or longer if required by law or the nature of the information.

11. Whistleblower Protection and Non-Retaliation

- Whistleblowers are protected from **retaliation, discrimination, or victimization**.
- **Anonymous reporting channels** will be maintained.
- Any officer who receives a whistleblower complaint must forward it to the Ethics Committee within **48 hours**.
- Retaliatory action attracts **severe sanctions**, including suspension or expulsion.

12. Ethics Review, Reporting, and Enforcement

12.1 Reporting

Reports must be submitted in writing to the Ethics Committee via designated channels

- Email: ethics@pmigh.com
- Hotline: +233-593877092, or
- Secure physical drop-box: at the PMI Ghana office, Accra.

12.2 Investigation Process

1. Acknowledge receipt within **5 working days**.
2. Conduct a preliminary review within **15 working days**.

3. Invite responses from the accused, ensuring impartiality.
4. Maintain confidentiality throughout.

12.3 Sanctions (Linked to Appendix D)

- Written warning
- Temporary suspension from PMI Ghana activities
- Membership termination or expulsion

12.4 Appeals

- Any person aggrieved by a decision shall first submit a **written petition**, duly signed and endorsed with any applicable statutory or administrative requirements, to the **PMI Ghana Board of Directors** within **three (3) months** of the date of the decision.
- If the matter is not resolved to the appellant's satisfaction through the PMI Ghana Board process, the appellant may escalate the appeal to the **PMI Global Appeals Structure** in accordance with PMI Global's applicable policies and procedures.
- Appeals at either stage shall be handled in a fair, impartial, and timely manner, ensuring due consideration of all relevant facts and adherence to the **PMI Code of Ethics and Professional Conduct**.

13. Ethics Training, Communication, and Culture Building

- Annual **ethics forums, workshops, and onboarding sessions** shall be mandatory.
- **Ethics Champions** will be appointed across working groups to promote ethics culture.
- An **Annual Ethics Compliance Declaration** shall be completed and signed by **all officers, volunteers, members of PMI Ghana, and non-members** including contractors, vendors, consultants, and any other parties engaged with PMI Ghana for the duration of their involvement. This declaration affirms their understanding of, and commitment to, the **PMI Ghana Ethics Governing Manual**, the **PMI Code of Ethics and Professional Conduct**, and all applicable laws and policies during their period of engagement.

14. Emerging Ethical Considerations

PMI Ghana shall proactively address evolving ethical issues:

- **AI & Digital Ethics** – Avoid bias and ensure transparency in automated decisions.

- **Environmental Ethics** – Promote sustainability in all projects.
- **Social Inclusion & Gender Mainstreaming** – Ensure equitable participation by women, youth, persons with disabilities, and other underrepresented groups.

15. Monitoring, Reporting, and Ethics KPIs

The Ethics Committee shall submit **quarterly and annual reports** to the Board, including:

- Number and types of ethics cases reported/resolved.
- Resolution timelines and outcomes.
- Participation rates in ethics training.
- Identified emerging ethical risks.

Responsible Party: Ethics Chair (supported by the Chapter Secretary).

16. Amendment and Review

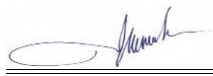
- Reviewed **every two years** or earlier as required.
- Reviews shall incorporate **PMI Global updates, regulatory changes, and stakeholder consultations**.

17. Endorsement and Adoption

This manual was **reviewed, approved, and adopted** by the PMI Ghana Board of Directors on [30th September 2025].

Signed:

Mr. Frank Owusu-Asamoah
President, PMI Ghana

Signature: 

Date: 05/09/2025

Ms. Jumoke Lafenwa
Chair, Ethics & Compliance Committee

Signature: 

Date: 30/08/2025

APPENDIX A – ETHICS VIOLATION HANDLING PROCESS (Flowchart)

Commentary on the Ethics Violation Handling Process

The Ethics Violation Handling Process ensures **transparency, fairness, and accountability**

when addressing ethical concerns. It reflects PMI Ghana's commitment to **Responsibility, Respect, Fairness, and Honesty.**



1. **Report Submission** – Initiates the process via email, hotline, or secure drop-box. **Anonymous reporting is allowed** to encourage whistleblowing without fear of retaliation.
2. **Preliminary Review (15 Working Days)** – The Ethics Committee classifies violations as **Minor, Moderate, or Severe**, ensuring proportional response and resource allocation.
3. **Formal Investigation** – Impartial evidence collection, witness statements, and responses are obtained under strict confidentiality.
4. **Determination & Sanctions** – Sanctions are determined based on the **Misconduct-Sanction Matrix (Appendix D)** and both parties are formally notified.
5. **Appeal Process** – The accused may appeal to the Board within **30 days**, ensuring due process and fairness.
6. **Closure & Reporting** – Outcomes are documented in **quarterly and annual ethics reports** to strengthen ethical culture and identify systemic risks.

APPENDIX B – ILLUSTRATIVE ETHICAL SCENARIOS

Scenario 1 – Conflict of Interest

Situation: A Board member’s spouse owns a consultancy bidding for a PMI Ghana training contract.

Ethical Expectation: The Board member must disclose the relationship and recuse themselves from all related discussions and voting.

Scenario 2 – Whistleblower Case

Situation: A volunteer discovers financial irregularities in an event budget and reports anonymously.

Ethical Expectation: The Ethics Committee investigates impartially; whistleblower identity remains confidential; any retaliation attracts strict sanctions.

Scenario 3 – AI and Data Ethics

Situation: A project team uses an AI tool for member profiling without consent.

Ethical Expectation: PMI Ghana mandates informed consent and prohibits use of personal data for unauthorized commercial purposes.

Scenario 4 – Gifts and Bribery

Situation: A member receives a luxury gift from a vendor during a procurement process.

Ethical Expectation: Reject or declare the gift immediately; accepting could compromise impartiality and lead to sanctions.

Scenario 5 – Social Inclusion

Situation: A training program excludes women or persons with disabilities due to logistical assumptions.

Ethical Expectation: All programs must ensure equal access and inclusivity, aligned with PMI Ghana’s social inclusion principles.

APPENDIX C – ANNUAL ETHICS COMPLIANCE DECLARATION FORM

PMI GHANA – ANNUAL ETHICS COMPLIANCE DECLARATION FORM

(To be signed by Board members, volunteers, and key officers annually)

1. Personal Details

- **Name:** _____
 - **Role/Position:** _____
 - **PMI Membership ID (if applicable):** _____
-

2. Declaration

I hereby declare that:

- ☐ I have read, understood, and commit to abide by the **PMI Ghana Ethics Governing manual**.
 - ☐ I have disclosed and will continue to disclose any real or perceived **conflicts of interest** to the Ethics Committee.
 - ☐ I have not engaged in unethical conduct, bribery, facilitation payments, or misuse of authority.
 - ☐ I will report any known or suspected ethical violations in good faith.
-

3. Conflict of Interest Disclosure (if applicable)

- ☐ **None to Declare**
- ☐ **Yes (Details Below or Attached):**

4. Signature & Date

Signature: _____

Date: _____

(To be submitted annually to the Ethics Committee Secretariat)

APPENDIX D – MISCONDUCT-SANCTION MATRIX

Category of Breach	Definition	Key Items / Examples	Sanction Level	Possible Sanctions
LEVEL 1 – MINOR BREACH	An act of unprofessionalism that does not result in significant harm to individuals, the organization, or their reputation but undermines ethical standards or shows disregard for expected professional conduct. Usually correctable through guidance and education.	i. Rude behavior & discourtesy – impolite or disrespectful verbal/written communication. ii. Delayed reporting of non-critical issues – failure to report errors or irregularities that pose no immediate risk. iii. Unintentional breach of etiquette or protocol – accidental failure to follow professional norms.	Level 1	• Written warning • Ethics coaching or counseling session • Behavioral monitoring
LEVEL 2 – MODERATE BREACH	Misconduct demonstrating disregard for ethical and professional standards, with potential reputational or operational risks if repeated, but not criminal or gross negligence.	i. Failure to disclose conflict of interest – unreported personal/financial interests. ii. Repeated unprofessional conduct – persistent minor breaches despite warnings.	Level 2	• Formal written reprimand • Temporary suspension (1–6 months) • Mandatory ethics retraining • Temporary exclusion from leadership roles

Category of Breach	Definition	Key Items / Examples	Sanction Level	Possible Sanctions
		iii. Misuse of PMI logo/brand identity – unauthorized use for personal gain or misrepresentation. iv. Inappropriate use of confidential information (non-critical).		
LEVEL 3 – SEVERE BREACH	Serious violations of ethical and professional standards that harm individuals, compromise organizational integrity, or intentionally breach trust.	i. Bribery – offering/accepting value to influence decisions improperly. ii. Facilitation payments (kickbacks). iii. Data misuse – unauthorized use or sharing of confidential data for gain. iv. Whistleblower retaliation – harassment or penalizing ethical reporters.	Level 3	• Suspension (6–12 months) • Termination of membership • Public censure • Permanent disqualification from leadership

Category of Breach	Definition	Key Items / Examples	Sanction Level	Possible Sanctions
		v. Fraud – intentional deception (e.g., falsifying records).		
LEVEL 4 – CRITICAL BREACH / GROSS MISCONDUCT	Grave violations involving criminality, gross negligence, or actions that fundamentally breach ethical and legal norms, severely harming individuals, the profession, or the organization.	i. Embezzlement – misappropriation of funds. ii. Sexual harassment – unwelcome sexual conduct violating dignity and safety. iii. Serious legal breaches – criminal offenses (e.g., money laundering, cybercrime). iv. Repeat severe offenses – persistent severe breaches after sanctions.	Level 4	• Permanent expulsion • Referral to law enforcement/regulators • Public disclosure of misconduct • Lifetime membership & leadership ban