

Compensation Equity and Transparency Framework

Public version: last updated September 1, 2025

How we determine compensation at Accountability Counsel

1

We have a transparent compensation band for each role category

We benchmark that compensation band on US non-profit market data. The bands are generally narrow, to allow recognition of relative experience and responsibilities, while minimizing the risk of bias or inequity.

2

We apply a percentage cost of living adjustment based on your location

These multipliers (100%, 90%, 80%, 70%) take account of the differentiated living costs of our global team, while closing the gap found in traditional market-based compensation approaches. The formula to determine the multiplier, and its application, are transparent.

3

We determine the compensation for each team member within the adjusted band - relative to others within that band

Team members will know which band they are in, where they are positioned within the band (including relative to others), and why.

Goals

Compensation at Accountability Counsel is guided by the expressed desire of Accountability Counsel's Board of Directors and Executive Director to be a leading and competitive non-profit organization. "Leading", in this context, includes leading with [values](#).

This latest revision of our compensation and promotion framework has been designed to:

- Ensure that compensation at Accountability Counsel is up-to-date and competitive within the US and global markets;
- Explicitly incorporate and reflect our values, including equity, transparency, and accountability;
- Establish a framework for greater transparency into compensation and internal promotion at Accountability Counsel. We believe that transparency creates accountability and will help us to avoid inequities in compensation and promotion opportunities;
- Define compensation bands to provide greater predictability and reduce the amount of discretion involved in individual compensation decisions in an effort to avoid inequity;
- Indicate clearly to all existing and potential team members the range of compensation available for a role, and based on transparent criteria, to ensure equal access to information about potential advancement;
- Ensure that compensation is progressive, reflecting increases in experience, skills, and responsibilities over time, and equitable relative to the experience, skills, and responsibilities of other team members;

- Define the essential characteristics of each role category, so that team members know what they need to demonstrate in order to progress;
- Reflect, at a minimum, a livable wage for all team members, in all locations;
- Intentionally reduce our global pay gap, by creating a single set of compensation bands, and then applying a limited cost of living adjustment to reflect lower cost settings; and
- Establish new commitments to transparency for internal promotions.

Process

Prior to the start of each new fiscal year, the Executive Director, in consultation with supervisors, will review compensation and benefits for all team members.

The Executive Director's own compensation is set and reviewed by the Board of Directors during the Executive Session of a Board meeting (without the participation of the Executive Director).

Final compensation decisions will be made by the Executive Director within the framework described below. This framework is designed to ensure that compensation is predictable, progressive, transparent, and equitable across the organization. When budget allows, team members should expect their compensation to increase progressively, reflecting increases in experience, skills and responsibilities, as well as cost of living, over time. In the event of budget constraints, the Executive Director will take steps to ensure financial transparency and that those constraints are evenly applied and do not give rise to any inequity across the organization.

Step 1: Compensation bands

In order to establish compensation bands, we have identified a series of role categories across the organization.

(a) Defining role categories

The role categories will form two groups: Executive and Programs. Within those groups, there are numerous categories and levels, each with their own compensation band. The present categories are:

| |
|------------------------------------|
| <i>Executive role categories -</i> |
| Director of Development |
| Director of Finance |
| Operations Associate IV |
| Operations Associate III |
| Operations Associate II |
| Operations Associate I |

| <i>Program role categories -</i> |
|----------------------------------|
| Director of Programs & Strategy |
| Program Directors |
| Senior Program Associate II |
| Senior Program Associate I |
| Program Associate III |
| Program Associate II |
| Program Associate I |

We have articulated the “essential characteristics” of each of these role categories to provide a clear and transparent guide to team members who want to know why they are in a particular role category and what they need to demonstrate to reach the next one.

New categories are likely to be needed in the future as we expand and new roles are created.

(b) Establishing compensation bands

For each role category, we have created a compensation band by reference to relevant market data. Our goal is to be internationally competitive for similar roles at peer organizations or organizations of a similar size, but also to be consistent with our values: this means that we may have excluded market compensation rates that promote inequity or were inadequate.

We have established narrow bands to allow recognition of relative experience and responsibilities while minimizing the risk of bias or inequity. Bands become wider in Director roles and above where there is a broader range of qualifications and experience that could occupy those positions and tenure (in a single role category) is typically longer. Most bands are mutually exclusive. We seek to avoid overlap between the bands to ensure that compensation and promotion (role recognition) are aligned, progressive, and internally consistent across the organization.

No hire will be made outside of the bands. These bands should be reviewed at least yearly and when any new hire is made.

Compensation bands, as well as who occupies each of them, will be transparent internally.

Step 2: Cost of living adjustment

We seek to be a non-US-centric organization, recognizing that many of our roles compete within a global marketplace. However, at this time, the primary sources of our compensation comparison data are from California and D.C. For this reason, locations outside of California and DC will be subject to a cost of living review, and categorized as high, intermediate, average, or low cost of living by creating a cost of living index using reputable cost of living data. California

and DC are not currently subject to this cost of living adjustment because those locations formed the foundation of the current compensation benchmarks: the benchmarks themselves reflect the appropriate compensation for team members in those roles in those regions. If we adjust our benchmark sources in the future, this will be revised.

Based on a team member's location, a cost of living multiplier is applied to take account of the differentiated living costs. The multipliers are approximate and in most cases will be higher than real COL differences, in an effort to mitigate our global pay gap. This approach allows us to use a generous labor market as the basis of our formula while addressing the impact of locality in a simple, affordable, and sustainable manner.

The cost of living multipliers are: high (100% of the band); intermediate (90%); average (80%); and low (70%).

This approach isn't perfect and doesn't consider all unique circumstances, but it does allow us to minimize subjectivity.

Step 3: Determining the compensation for each team member within the relevant band

An individual's position within the band will reflect their experience, performance, skills, and responsibilities, individually and relative to others within the band, taking into account the essential characteristics of their role. This decision will be made by the Executive Director, in consultation with relevant supervisors. The Executive Director will also be reviewing compensation across the organization to ensure that it remains equitable, taking into account the principle of equivalent compensation for equivalent experience, performance, skills, and responsibilities. Cost of living increases will continue to be a factor in compensation decision-making, but as one factor among others.

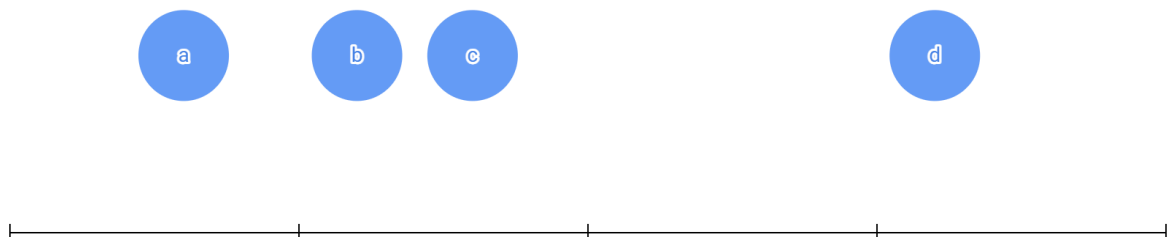
Each year, when compensation decisions are made, team members will be advised where they are positioned within the band including relative to others (in an anonymized form). For example, compensation decisions could be communicated as follows:

Role category: Operations Associate II

COL Multiplier: High (100%)

Salary: \$70,000

Relative position in band: [you are b, for example]



Directors will know the compensation of those within their direct and indirect reporting lines. Team members should feel empowered to advocate with their supervisor for progression within their band, or to the next band, by reference to their performance (with emphasis on the essential characteristics/milestones of their role).

Bonuses

Under this compensation framework, one-off bonuses should be rare with preference given to regular compensation progression in line with increasing skills and expertise. The primary situation where bonuses will still be granted are to recognize when a team member is asked to take on substantial additional responsibilities outside of their usual role, such as during another team member's sabbatical, parental leave, or other vacancy.

Future changes

This compensation approach is subject to change and refinement over time. If the approach is modified, no team member will have their compensation reduced: changes will apply to forward-looking compensation decisions only. Over time, this may result in some historical exceptions (*i.e.* compensation outside of the band), however the existence of exceptions will be visible to other team members within the same role category (in an anonymized form) in order to provide transparency and accountability.

Internal promotion

Promotions between role categories that represent an increase in skills and experience, but not a new and distinct set of responsibilities, will be made by the Executive Director in consultation with the relevant supervisor(s). The decision will take into account relevant professional experience and competencies, coupled with consistent exceptional performance evaluations. Such promotions are not anticipated to be restricted in number. This includes changes in role categories such as Program Associate III to Senior Program Associate I.

Internal promotions that involve a new and distinct set of responsibilities and where the opportunity for promotion is limited, such as the creation of a new role, will require additional transparency. The opportunity for promotion should be announced to the entire organization, with an invitation for expressions of interest. If multiple expressions of interest are received, a competitive process will be undertaken before the appointment is made.

Benefits

We seek to provide our team members with exceptional benefits that recognize the whole person. These include full medical, vision, and dental insurance; mental health care coverage and encouragement of wellness as a priority; retirement benefits with an employer contribution; commuter benefits; option to use a flexible spending account; access to a professional development fund and support around professional development goals; and paid sabbaticals. We also have generous paid time off, a large number of paid holidays, and paid sick leave, as well as post-travel decompression time off.

Benefits decisions are made by the Executive Director, with approval by the Board of Directors, as part of a regular review of Accountability Counsel’s Employee Handbook.

Annex 1: Essential characteristics of each role category

In order to be placed within a particular category, the team member must already demonstrate *or be expected to shortly demonstrate (if new to AC)* the following characteristics in the execution of their particular job duties and responsibilities:

| Executive roles |
|--|
| <p>Director of Development</p> <ul style="list-style-type: none"> • Operates with a commitment to placing the agency and dignity of the communities with whom we work at the forefront of our fundraising efforts • Develops and implements a comprehensive fundraising strategy to ensure that our revenue is growing consistently and sustainably in-line with our organizational strategy • Efficiently and effectively manages all fundraising activities, taking ownership of all aspects of the development cycle, while working with team members as key stakeholders in fundraising activities • Designs, implements, and refines development systems and procedures that are effective and consistent with our values and respect-based approach • Initiates, develops, and maintains strong relationships with donors, potential donors, partners, and other supporters • Builds a strong funding pipeline, with thoughtful and innovative prospects • Is a compelling communicator and ambassador for our programmatic work and impact, inspiring donors and other supporters to believe and invest in our organization and mission • Supports the sustainability and growth of our partner organizations, through effective, empowering, and respectful solidarity fundraising • Empowers team members to build their skills, experience, and responsibilities within a nurturing, supportive environment, with the capacity to respectfully and effectively manage performance issues when needed • Actively supports and facilitates the professional development and wellbeing of their team • Communicates well across the organization, fostering participation in decision-making, transparency, and collaboration • Initiates and supports strategic external communications, including thought leadership on the role (and risks) of philanthropy in social and environmental justice movements • Demonstrates leadership within AC beyond core operational responsibilities, such as within staff committees • Supports other organizational goals, as needed |

Director of Finance

- Manages the financial activities of our organization to ensure that we are fiscally responsible and sound at all times, and acting consistently with our policies and the highest standards of professionalism
- Clearly and accurately communicates our financial position to the Executive Director, team, Board, and Funders, providing transparent financial information to auditors and the public
- Leads a collaborative annual budget process with input from the Executive Director and team
- Designs, implements, and refines financial systems, policies, and procedures that are effective, consistent with our [values](#) and [respect-based approach](#), and support organizational impact
- Maintains and manages effective and professional working relationships with landlords, external bookkeepers, accountants, tax preparers, auditors.
- Communicates well across the organization, fostering participation in decision-making, transparency, and collaboration
- Demonstrates leadership within AC beyond core operational responsibilities, such as within staff committees
- Supports hiring/recruitment and fundraising goals, as needed

Operations Associate IV

- Has the characteristics of Operations Associate III, plus
- Leads their core operational area, including critical (including high priority and/or challenging) initiatives with independence and initiative, requiring minimal supervision
- Together with the Executive Director and/or Director of Finance & Administration, develops and is accountable for the overarching strategy for their core operational area
- Constructively contributes within AC beyond their core operational responsibilities, such as: supporting broader efforts to strengthen our organizational governance and culture; developing or refining policies, procedures, or systems beyond their area of work; and/or staff committees

Operations Associate III

- Has the characteristics of Operations Associate II, plus
- Is an expert within their core operational area (communications, fundraising, human resources, finance and administration)
- Operates with independence and initiative, requiring minimal supervision
- Plays a leading role in the development and refinement of policies, procedures, and systems relevant to their area of work
- Is capable of supervising and mentoring full-time staff, including by supporting their wellbeing and professional development
- Supports AC to deepen its commitment to its values and respect-based approach by contributing to stronger, more inclusive, practices and procedures

Operations Associate II

- Has the characteristics of Operations Associate I, plus
- Is a confident leader of specific operational initiatives
- Is developing subject-matter expertise within their core operational area (communications, fundraising, human resources, finance and administration)
- Demonstrates critical, strategic thinking
- Is an effective supervisor and mentor of interns and fellows
- Is a strong and accurate communicator, orally and in writing
- Displays strong interpersonal skills, demonstrated through the development of strong relationships inside and outside of AC
- Demonstrates effective prioritization and time management across multiple initiatives
- Demonstrates rigorous commitment to our respect-based approach, internally and externally

Operations Associate I

- Is developing skills relevant to our organization
- Supports team members to implement initiatives
- Leads discrete projects
- Undertakes complex and nuanced analyses of organizational issues
- Is working in close and respectful partnership with internal and external stakeholders
- Communicates effectively, both orally and in writing

Program roles

Director of Programs & Strategy

- Oversees program activities to ensure that they are consistent with our [values](#), [strategy](#), and the highest standards of professionalism
- Oversees organizational impact in terms of our 5-Year Strategic Goals and our [Evergreen Team Aims](#), advancing our mission and Theory of Change
- Supports the Executive Director to establish, execute, refine, and monitor our impact vis-a-vis our organizational strategy
- Supports the organization to build and implement team growth strategies through collective processes
- Supports Program Directors to plan and manage their budgets and deploy program resources (human and financial) effectively and responsibly
- Provides Program Directors with empowering leadership, that recognizes and fosters their own expertise and leadership skills, while respectfully and effectively managing performance issues when needed
- Leads cross-organizational projects designed to ensure that Accountability Counsel is a values-driven, credible, progressive, resilient, and effective organization
- Actively supports and facilitates the professional development and wellbeing of program staff
- Shares expertise throughout our organization and our field through peer learning, thought leadership, mentorship, teaching, and other knowledge exchange opportunities

- Proactively identifies and supports opportunities for meaningful and strategic collaborations between programs and with partner organizations
- Demonstrates leadership within AC beyond core operational responsibilities, such as within staff committees
- Communicates well across the organization, fostering participation in decision-making, transparency, and collaboration
- Supports the Executive Director to identify, mitigate, and manage organizational risks and barriers to impact
- Initiates mission-driven content and communications, drawing on themes and insight across and between programs and connecting those to related advocacy and justice movements, in addition to program-specific content and communications
- Supports fundraising goals, as needed

Program Directors

- Has the characteristics of Senior Program Associate II, plus
- Actively manages program activities to ensure that they are consistent with our [values](#), [strategy](#), and the highest standards of professionalism
- Oversees and contributes to program impact in terms of our 5-Year Strategic Goals and our [Evergreen Team Aims](#), advancing our mission and Theory of Change
- Proactively identifies and builds relationships with key stakeholders (including civil society partners, policy-makers, decision-makers, accountability office professionals, etc)
- Supports budget planning and deploys program resources (human and financial) effectively and responsibly
- Empowers team members to build their skills, experience, and responsibilities within a nurturing, supportive environment, with the capacity to respectfully and effectively manage performance issues when needed
- Actively supports and facilitates the professional development and wellbeing of their team
- Shares expertise throughout our organization and our field through peer learning, thought leadership, mentorship, teaching, and other knowledge exchange opportunities
- Identifies and supports opportunities for meaningful and strategic collaborations between programs
- Communicates well within their team and outside of it, fostering participation in decision-making, transparency, and collaboration
- Supports the Director of Programs & Strategy and Executive Director to identify, mitigate, and manage organizational risks and barriers to impact
- Initiates mission-driven content and communications, drawing on themes and insight across and between programs and connecting those to related advocacy and justice movements, in addition to program-specific content and communications
- Supports fundraising goals, as needed

Senior Program Associate II

- Has the characteristics of Senior Program Associate I, plus
- Effectively manages multiple critical initiatives with a significant degree of independence
- Has multi-year experience supervising staff, with positive evaluations from supervisees
- Demonstrates leadership within AC beyond core program responsibilities, such as on strategy development; developing or refining policies, procedures, or systems relevant to their area of work; and/or within staff committees
- Capable of navigating our most challenging or complex initiatives or partnerships with sound judgment, risk mitigation and management
- Trusted to advocate for AC's work and/or issues in any setting, including with high value or challenging advocacy targets
- Generates impactful program-related content and communications as well as supporting and contributing to mission-driven and organization-level communications

Senior Program Associate I

- Has the characteristics of Program Associate III, plus
- Is an expert in their program area
- Leads critical (high priority) initiatives with independence and initiative, requiring minimal supervision
- Is capable of supervising and mentoring full-time staff, including by supporting their wellbeing and professional development
- Demonstrates leadership beyond AC in relevant field(s) (i.e. IAM accountability, human rights, environmental law, environmental and social justice, international development, corporate accountability), as a regular speaker or author, or someone that peers turn to for advice
- Constructively contributes within AC beyond core program responsibilities, such as on strategy development; developing or refining policies, procedures, or systems relevant to their area of work; and/or staff committees
- Supports AC to deepen its commitment to its values and respect-based approach by contributing to stronger, more inclusive, practices and procedures
- A compelling, effective, and inclusive host and/or facilitator of important public events

Program Associate III

- Has the characteristics of Program Associate II, plus
- Has a strong understanding of their program area and relevant policies and practices
- Excellent time management, including balancing multiple program initiatives
- Develops new strategies while demonstrating sound judgment, in addition to implementing existing ones
- Innovates beyond what we normally do
- Leads high level advocacy, such as with Boards of Directors or senior officials
- Confidently, sensitively, and respectfully manages coalitions and collaborations with partners

- Proactively identifies intersections and opportunities for collaboration with other programs in their work
- A compelling presenter / advocate for AC's work and issues in public settings or networks with important advocacy targets
- Initiates external communications related to their program area

Program Associate II

- Has the characteristics of Program Associate I, plus
- Is a confident leader of specific program initiatives
- Has a good understanding of their program area and relevant policies and practices
- Demonstrates critical, strategic thinking
- Is an effective supervisor and mentor of interns and fellows
- Is a strong and accurate communicator, orally and in writing
- Has strong interpersonal skills, demonstrated through the development of strong relationships inside and outside of AC
- Demonstrates effective prioritization and time management across multiple initiatives
- Demonstrates rigorous commitment to our values and respect-based approach, internally and externally
- Contributes to external communications related to their program area

Program Associate I

- Is developing skills relevant to our field
- Is supporting other team members to develop strategy and implement initiatives
- Is leading on discrete projects
- Undertakes complex and nuanced analyses of issues in our field
- Is working in close and respectful partnership with civil society colleagues and/or communities
- Communicates effectively, both orally and in writing

FY 25-26 Compensation Bands

| Role categories | FY26 Band min (100%) | FY26 Band max (100%) | FY26 Band min (90%) | FY26 Band max (90%) | FY26 Band min (80%) | FY26 Band max (80%) | FY26 Band min (70%) | FY26 Band max (70%) |
|------------------------------|----------------------|----------------------|---------------------|---------------------|---------------------|---------------------|---------------------|---------------------|
| Operations | | | | | | | | |
| Director of Development | \$120,000 | \$140,000 | \$108,000 | \$126,000 | \$96,000 | \$112,000 | \$84,000 | \$98,000 |
| Director of Finance | \$105,000 | \$125,000 | \$94,500 | \$112,500 | \$84,000 | \$100,000 | \$73,500 | \$87,500 |
| GST/Operations Associate IV | \$97,000 | \$107,000 | \$87,300 | \$96,300 | \$77,600 | \$85,600 | \$67,900 | \$74,900 |
| GST/Operations Associate III | \$87,000 | \$97,000 | \$78,300 | \$87,300 | \$69,600 | \$77,600 | \$60,900 | \$67,900 |
| GST/Operations Associate II | \$77,000 | \$87,000 | \$69,300 | \$78,300 | \$61,600 | \$69,600 | \$53,900 | \$60,900 |
| GST/Operations Associate I | \$67,000 | \$77,000 | \$60,300 | \$69,300 | \$53,600 | \$61,600 | \$46,900 | \$53,900 |
| Programs | | | | | | | | |
| Director of P&S | \$115,000 | \$150,000 | \$103,500 | \$135,000 | \$92,000 | \$120,000 | \$80,500 | \$105,000 |
| Program Directors | \$107,000 | \$140,000 | \$96,300 | \$126,000 | \$85,600 | \$112,000 | \$74,900 | \$98,000 |
| Senior Program Associate II | \$107,000 | \$117,000 | \$96,300 | \$105,300 | \$85,600 | \$93,600 | \$74,900 | \$81,900 |
| Senior Program Associate I | \$97,000 | \$107,000 | \$87,300 | \$96,300 | \$77,600 | \$85,600 | \$67,900 | \$74,900 |
| Program Associate III | \$87,000 | \$97,000 | \$78,300 | \$87,300 | \$69,600 | \$77,600 | \$60,900 | \$67,900 |
| Program Associate II | \$77,000 | \$87,000 | \$69,300 | \$78,300 | \$61,600 | \$69,600 | \$53,900 | \$60,900 |
| Program Associate I | \$67,000 | \$77,000 | \$60,300 | \$69,300 | \$53,600 | \$61,600 | \$46,900 | \$53,900 |