

ASLM Code of Conduct Policy

Updated 2023

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Purpose

Our Code of Conduct is the first step for an employee to get clarity on any questions relating to ethical conduct and appropriate workplace behaviour. It sets forth our core values, shared responsibilities, commitments, and promises, and general guidance about the ASLM's expectations.

Working with integrity is ASLM's foundation. Integrity protects our team, our organization, and our partners; it improves our performance and differentiates us from our competitors. Our success hinges on the sustained commitment to ethical practices.

Our Code of Conduct cannot possibly address every situation we face at work. Therefore, it is by no means a substitute for good and unbiased judgment. We must remember that each of us is responsible for our own actions and that the ethical choice is always the best choice!

Scope

Our Code of Conduct applies to all our employees regardless of employment agreement, rank, length of service, or location. The Code also applies to third parties, such as consultants, agents, suppliers, and others acting on ASLM's behalf.

Access to Policies

ASLM wants each of our employees to have all the information and resources they need to make informed and ethical decisions. In this regard, all of ASLM's approved policies will be housed in a central repository on ASLM SharePoint, accessible to all staff. The policies can be accessed by ASLM staff via the below link:

https://aslmportal.sharepoint.com/sites/Intranet/workflows/Pages/DocumentManagement.aspx

Training

ASLM is committed to reinforcing awareness of our code of conduct messaging and policies through trainings, orientation, and reviews. We will take advantage of staff meetings, review meetings at organizational and departmental levels, ASLM Academy, etc. to disseminate and create awareness on this code of conduct and other ASLM policies.

Applicable Code of Conduct Policies

This code of conduct should be read in conjunction with other applicable ASLM policies, as highlighted throughout this document. The following policies underpin ASLM's code of conduct:

- Whistleblower Policy
- Anti-Corruption, Anti-Bribery and Anti-Fraud Policy
- Procurement manual
- Conflict of Interest
- Accepting Gifts, Entertainment, or Incentives
- Child & Youth Safeguarding
- Freedom from Harassment
- Anti-Prostitution and Trafficking in Persons

Whistleblower Policy

If you witness or suspect inappropriate behaviour, harmful/unlawful activity, you are required to report these by talking to your manager, Internal Audit, HR, COO or CEO. You can also write to ethics@aslm.org . If you prefer to report anonymously, you may do so through ASLM's Ethics Hotline as provided below:

Country	Number	Limitations	Language Provision
Ethiopia & All Other	+27 31 571 5307	International South African	English 24/7. French and
Countries		number. Accessible from all	Portuguese during South African
		networks at international call	business hours - Mondays to
		rates from any country to South	Fridays between 08h00 and 17h00
		Africa	CAT
South Africa	0800 331 666	Customized toll-free number.	English 24/7. All ten other official
		Toll-free access from all networks	languages during South African
		in South Africa	business days - Mondays to Fridays
			between 08h00 and 17:00 CAT

In addition to the unique telephone numbers referred to above, Deloitte will provide ASLM with access to the Deloitte Tip-offs website at the following web address: www.tip-offs.com from which a tip-off may be sent by the Whistleblower. Deloitte also provides a unique email address as follows ASLM@tip-offs.com
The ethics hotline is an externally managed, anonymous reporting tool and employees should report any eligible acts of corruption, bribery, harassment and fraud within 24 hours of the suspicion.

Anti-Corruption, Anti-Bribery and Anti-Fraud Policy

Fraud will not be tolerated and suspected fraud will be vigorously investigated as it poses a risk to ASLM's reputation and resources. An employee who is proved to have committed fraud will be dismissed immediately from their employment with ASLM. You have a duty to report, in good faith, ANY activity that you believe is questionable.

- Failure to report questionable acts may constitute a violation and may result in disciplinary action.
- ASLM prohibits retaliation of any form against a staff who reports suspected fraud.

ASLM also opposes bribes and facilitation payments as incompatible with our ethical, accountable and efficient business practices. ASLM complies with all applicable anti-bribery and anti-corruption laws, including the U.S. Foreign Corrupt Practices Act, and similar laws of other countries.

An employee must not solicit or receive anything of value from a potential or current contractor in exchange for assisting the contractor with winning or retaining business with ASLM. Lastly, an employee must not offer to pay, cause to be paid, or authorize a bribe or facilitation payment, including to government officials.

[Refer to the Anti-Corruption, Anti-Bribery and Anti-Fraud Policy]

Procurement Policy

ASLM has procedures in place to ensure that its contractors and service providers are selected in a fair manner. There are only limited exceptions allowed to making awards competitively. No employee is allowed to use their position at ASLM to personally benefit from or influence contractor selection.

[Refer to the Procurement Manual]

Conflict of Interest Policy

A conflict of interest occurs when an employee has a personal or professional relationship, financial interest, or obligation outside ASLM that could possibly corrupt the motivation for their business decisions. Any potential conflict of interest should be reported to ASLM for resolution. A potential conflict of interest isn't a bad thing, unless you choose not to disclose it. If you have a potential conflict of interest:

- Fill the DISCLOSURE FORM and submit to HR for review.
- If a conflict is determined to exist, you may not be involved in the business relationship or decision in any way.

[Refer to the Conflict-of-Interest Policy]

Accepting Gifts, Entertainment, or Incentives Policy

In general, employees may not accept gifts, even of nominal value. ASLM's reputation is vital and does not need to be tarnished by even the appearance of impropriety. There are only a few instances when it may be suitable to accept a gift.

[Refer to the Accepting Gifts, Entertainment, or Incentives Policy]

Child and Youth Safeguarding Policy

The safety of children and youth is paramount to ASLM. Child or Youth abuse, exploitation or neglect is prohibited and ASLM staff will:

- Comply with local child and youth welfare and protection legislation or international standards.
- Report suspected child and youth abuse, exploitation or neglect in ASLM work for investigation.
- Consider child and youth safeguarding principles when planning and implementing applicable projects. This includes measures such as limiting unsupervised visits with children and youth, no exposure to pornography, complying with laws, regulations and customs regarding the photographing of children and youth, etc.

[Refer to the Child and Youth Safeguarding Policy]

Freedom from Harassment Policy

ASLM is committed to providing our employees with a positive work environment, free of harassment. Any harassment based on race, religion, creed, age, gender, or any other basis protected by law is prohibited, and should be reported immediately.

Any report of harassment will be investigated and dealt with in an appropriate manner and with as much confidentiality as possible. It is important that all employees report any suspected cases of harassment within the workplace.

[Refer to the Freedom from Harassment Policy]

Anti-Prostitution and Trafficking in Persons

ASLM is opposed to prostitution and related activities, which are inherently harmful, dehumanizing, and contribute to the phenomenon of trafficking in persons. Trafficking in persons is defined as when a commercial sex act is induced by force, fraud or coercion, or in which the person induced to perform such an act is not yet 18 years of age. ASLM employees are prohibited from:

- Trafficking in persons
- Procuring commercial sex acts
- Using forced labor
- Acts that directly support or advance trafficking in persons

[Refer to the Anti-Prostitution and Trafficking in Persons Policy]

Other Applicable Code of Conduct Guidelines

In addition to the policies listed above, the below general guidelines also form part of ASLM's code of conduct and should be adhered to:

- ASLM Dress code
- Cyber Security and digital devices
- Social Media
- Employee Relationships
- Workplace Visitors
- Solicitation and Distribution

Dress code

The concept of "workplace" at ASLM is somewhat dynamic. This is because most of our staff work remotely, while others work out of our offices in Ethiopia and South Africa.

ASLM's <u>official dress code</u> in the office is Business Casual/ Smart Casual. This standard is also expected for remote working staff while engaging in official virtual meetings e.g., interviews, Board meetings, trainings, etc. In addition, an employee's position may also inform how they should dress. For example, if you frequently meet with donors, board members and other strategic partners, please conform to a more formal dress code. We expect all staff to be clean when coming to work and avoid wearing clothes that are unprofessional (e.g., workout clothes, indecent outfits, etc.)

If you conform with the guidelines above, we don't have specific expectations about what types of clothes or accessories you should wear.

We also respect and permit grooming styles, clothing and accessories that are dictated by religious beliefs, ethnicity, or disability, etc.

Cyber security and digital devices

This section deals with all things digital at work. ASLM guidelines for using computers, phones, internet connection and social media to ensure security and protect our assets are as follows:

Internet usage

Our corporate internet connection is primarily for business. Employees can occasionally use the connection for personal purposes as long as they don't interfere with their job responsibilities. Also, we expect employees to halt personal activities that slow down ASLM internet connection (e.g., uploading photos, YouTube content, etc.

Staff must not use ASLM internet connection to:

• Download or upload obscene, offensive, or illegal material.

- Send confidential information to unauthorized recipients.
- Invade another person's privacy and gain access to sensitive information.
- Download or upload pirated movies, music, material, or software.
- Visit potentially dangerous websites that can compromise our network and computers' safety.
- Perform unauthorized or illegal actions, like hacking, fraud or buying/selling illegal goods.

Cell phone

We allow use of cell phones at work. To ensure that devices won't distract staff from their work or disrupt the workplace, we ask staff to follow a few simple rules during normal working hours:

- Use your cell phone in a manner that benefits your work (business calls, productivity apps, calendars.)
- Keep personal calls brief and use an empty meeting room or common area so as not to disturb your colleagues.
- Avoid playing games on your phone or texting excessively.
- Don't use your phone to record confidential information.
- Don't download or upload inappropriate, illegal, or obscene material using our corporate internet connection.

Also, you must not use your phone in areas where cell phone use is explicitly prohibited (e.g., laboratories.)

Corporate email

Email is essential to ASLM work. You should use your ASLM email primarily for work, but we allow some uses of your ASLM email for personal reasons.

- Work-related use. You can use your corporate email for work-related purposes without limitations. For
 example, you can sign up for newsletters and online services that will help you in your job or professional
 growth.
- **Personal use**. You can use your email for personal reasons if you keep it safe and avoid spamming and disclosing confidential information. For example, you can send emails to friends and family and download eBooks, guides, and other safe content for your personal use.

Our general expectations

No matter how you use your corporate email, we expect you to avoid:

- Signing up for illegal, unreliable, disreputable, or suspect websites and services.
- Sending unauthorized marketing content or emails.
- Registering for a competitor's services, unless authorized.
- Sending insulting or discriminatory messages and content.
- Spamming other people's emails, including your coworkers.

In general, use strong passwords and be vigilant in catching emails that carry malware or phishing attempts. If you are not sure that an email you received is safe, ask our IT Department.

Social media

We want to provide practical advice to prevent careless use of social media in our workplace. We address two types of social media uses: using personal social media at work and representing ASLM through social media.

Using personal social media at work

You are permitted to access your personal accounts at work, but we expect you to act responsibly, according to our policies, and ensure that you stay productive. Specifically, we ask you to:

- **Discipline yourself**. Avoid getting sidetracked by your social platforms.
- Ensure others know that your personal account or statements don't represent ASLM. For example, use a disclaimer such as "opinions are my own."
- Avoid sharing ASLM intellectual property or confidential information. Ask your manager or Communications Department first before you share ASLM news that's not officially announced.
- Avoid any defamatory, offensive, or derogatory content. You may violate ASLM's anti-harassment policy if you direct such content towards colleagues, clients, or partners.

Representing ASLM through social media

If you handle our social media accounts or speak on ASLM behalf, we expect you to protect ASLM's image and reputation. Specifically, you should:

- Be respectful, polite, and patient.
- Avoid speaking on matters outside your field of expertise.
- Follow our confidentiality and data protection policies and observe laws governing copyrights, trademarks, plagiarism, and fair use.
- Coordinate with our communications department when you're about to share any major-impact content.
- Correct or remove any misleading or false content as quickly as possible.
- Consult when in doubt.

Employee relationships

We want to ensure that relationships between employees are appropriate and harmonious. We outline our guidelines, and we ask you to always behave professionally.

Fraternization

Fraternization refers to dating or being friends with your colleagues. In this policy, "dating" equals consensual romantic relationships and sexual relations. Non-consensual relationships constitute sexual harassment, and we prohibit them explicitly and will be subject to prosecution in the relevant jurisdiction.

Dating colleagues

If you start dating a colleague, we expect you to maintain professionalism and keep personal discussions outside of the ASLM workplace.

You are also obliged to respect your colleagues who date each other. We won't tolerate sexual jokes, malicious gossip, and improper comments. If you witness this kind of behavior, please report it to HR.

Dating managers

To avoid accusations of favoritism, abuse of authority and sexual harassment, supervisors must not date their direct reports. This restriction extends to every staff who is at manager level and above.

Also, if you act as a hiring manager, you aren't allowed to hire your partner to your team. You can refer them for employment to other teams or departments where you don't have any managerial or hiring authority.

Friendships at work

Employees who work together may naturally form friendships either in or outside of the workplace. We encourage this relationship between peers, as it can help you communicate and collaborate. However, we expect you to focus on your work and keep personal disputes outside of our workplace.

Employment of relatives

All ASLM employees should be hired, recognized or promoted because of their skills, character and work ethic. Restrictions on hiring of relatives are applied to prevent nepotism, favoritism or conflicts of interest which are all prohibited under the ASLM code of conduct and related policies.

To ASLM, a "relative" is someone who is related by blood or marriage within the third degree to an employee. This includes parents, grandparents, in-laws, spouses or domestic partners, children, grandchildren, siblings, uncles, aunts, nieces, nephews, step-parents, step-children and adopted children.

As an employee, you can refer your relatives to work with ASLM keeping the following restrictions in mind:

- You must not be involved in a supervisory/reporting relationship with a relative.
- You cannot be transferred, promoted, or hired inside a reporting relationship with a relative.
- You cannot be part of a hiring committee when your relative is interviewed for the respective position.

If you become related to a manager or direct report after you both become employed by ASLM, we may have to reassign one of you, and if not feasible, request that one of you to resign from ASLM.

Workplace visitors

If you want to invite a visitor to our offices for non-official reasons, please request prior permission from the *Administration Manager*. Also, inform *reception* of your visitor's arrival. Visitors should sign in and show identification.

When you have office visitors, you also have the responsibility to:

- Always tend to your visitors (especially when they are underage.)
- Keep your visitors away from areas where there are dangerous machines, confidential records or sensitive equipment.
- Prevent your visitors from proselytizing your colleagues, gathering donations, or requesting participation in activities while on our premises.

Anyone who delivers orders, mail or packages for employees should remain at our building's reception or gate. If you are expecting a delivery, *front office employees* will notify you so you may collect it.

Solicitation and distribution

Solicitation is any form of requesting money, support or participation in products, groups, organizations or causes which are unrelated to ASLM (e.g., religious proselytism, asking for petition signatures.) Distribution means disseminating literature or material for commercial or political purposes.

ASLM does not allow solicitation and distribution by non-employees in our workplace. As an employee, you may solicit from your colleagues only when you want to:

- Ask colleagues to help organize events for another employee (e.g., adoption/birth of a child, promotion, retiring.)
- Seek support for a cause, charity or fundraising event sponsored, funded, organized, or authorized by ASLM.
- Invite colleagues to employee activities for an authorized non-business purpose (e.g., recreation, volunteering.)
- Ask colleagues to participate in employment-related activities or groups protected by law (e.g., trade unions.)

In all cases, we ask that you do not disturb or distract colleagues from their work.

Please refer to ASLM's Employee Handbook for further details on the above highlighted general guidelines.