

1. PURPOSE

LEI's Code of Conduct is a commitment by all LEI representatives (employee, contractor, consultant, agent or non-executive director of the board) to operate in a manner consistent with the highest standards of conduct in order to promote good governance and positive outcomes.

This Code of Conduct shall be read and abided by in conjunction with all other LEI policies.

2. RESPONSIBILITY

All LEI representatives

3. POLICY

CORPORATE VALUES

LEI operates under the following values:

Integrity, honesty and ethics

Inspiration to our partners

Creativity, innovation and excellence

Respect for all individuals

All LEI representatives will:

- Observe and abide by all applicable laws and regulations in the country in which they reside and, if different, in the countries where the representative and LEI is doing business;
- Read and comply with all LEI Policies and Procedures;
- Conduct business in a truthful, honest, diligent, transparent and ethical manner;
- Treat clients, other representatives, suppliers, consultants and others with whom we interact, fairly, humanely and with proper regard for their rights and obligations without bias or discrimination;
- Respect and value cultural differences and diversity internally and among clients, suppliers, consultants and others with whom we interact;
- Honour commitments and respect confidentiality;
- Aim to comply with client quality and innovation expectations;
- Treat each other with respect and dignity, and foster an atmosphere of open communication, trust and mutual respect;
- Maintain a work environment that is free of discrimination and harassment of any kind; and
- Commit to protecting the health and safety of all staff, colleagues and counterparts in their workplace around the globe.

ETHICAL PRINCIPLES

LEI representatives will:

- comply with all applicable procurement laws and regulations;
- ensure transparency in all business dealings with all records required to be true, accurate, properly recorded and readily available for inspection;
- promote honesty, transparency and fairness by:
 - rejecting corruption in all its forms including bribery, collusion, coercion, facilitation payments, graft or any prohibited act;
 - understanding that bribery and graft are unlawful and strictly prohibited, regardless of jurisdiction or circumstance;
 - adopting and enforcing all policies that prevent corruption in the conduct of business;
 - ensuring that no public official benefits financially or in any other unlawful way from the relationship with the company;
 - immediately reporting to their manager if information is discovered indicating that a prohibited act has been committed.
- not falsify, fabricate or misrepresent data or results, even if pressured to do so by internal or external sources;

- prevent, detect and report fraud, waste or abuse, or any other prohibited acts;
- identify and disclose any actual, perceived or potential conflicts of interest;
- protect and not allow the unauthorised, improper or unlawful use of any information which was made available to them in the performance of their duties;
- refrain from engaging in discriminatory behaviours on the basis of race, colour, gender, language, religion, political or other opinion, national, ethnic or social origin, property, birth, pregnancy, marital status, disability, sexual orientation, age or any other protected status;
- promote gender equality and inclusive workplaces;
- prohibit transactions with, and the provision of resources and services to, individuals and organisations associated with human trafficking;
- avoid contracting and making payments, either directly or indirectly, to entities and/or individuals associated with terrorism.

CHILD PROTECTION

LEI has a zero tolerance of child abuse and upholds the values and purpose of the UN Convention on the Rights of the Child. (<https://www.unicef.org/child-rights-convention/convention-text>).

LEI representatives will:

- treat children with respect regardless of race, colour, gender, language, religion, political or other opinion, national, ethnic or social origin, property, disability, birth or other protected status
- not use language or behaviour towards children as well as adults and peers that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate
- not engage children under the age of consent in any form of sexual intercourse or sexual activity, including paying for sexual services or acts
- wherever possible, ensure that another adult is present when working in the proximity of children
- not invite unaccompanied children into one's home, unless they are at immediate risk of injury or in physical danger
- not sleep close to unsupervised children (excluding one's own children) unless absolutely necessary, in which case permission must be obtained and steps taken to ensure that another adult is present if possible
- not use any computers, mobile phones, video cameras, cameras or social media inappropriately, and never to exploit or harass children or to access child exploitation material through any medium
- not use physical punishment or discipline on children
- not hire children for domestic or other labour which is inappropriate given their age or developmental stage, which interferes with their time available for education and recreational activities, or which places them at significant risk of injury
- comply with all relevant Australian and local legislation, including labour laws in relation to child labour
- immediately report concerns or allegations of child exploitation and abuse and policy non-compliance in accordance with appropriate procedures.
- immediately disclose all charges, convictions and other outcomes of an offence, which occurred before or occurs during my association with LEI that relate to child exploitation and abuse.
- when photographing or filming a child or using children's images for work related purposes, will:

- assess and endeavour to comply with local traditions or restrictions for reproducing personal images before photographing or filming a child
- obtain informed consent from the child and a parent or guardian of the child before photographing or filming a child. As part of this an explanation must be given on how the photograph or film will be used
- ensure photographs, films, videos and DVDs present children in a dignified and respectful manner and not in a vulnerable or submissive manner. Children should be adequately clothed and not in poses that could be seen as sexually suggestive
- ensure images are honest representations of the context and the facts
- ensure file labels, meta data or text descriptions do not reveal identifying information about a child when sending images electronically or publishing images in any form.

A breach of the Code can put the Company at substantial risk. I hereby, understand that LEI holds representatives accountable for their conduct and expects them to adhere to the spirit and letter of this policy. To ensure compliance LEI asks its representatives to:

- Review this policy and commit in writing to abide by it;
- Report any non-compliant conduct or suspected unlawful or unethical conduct related to LEI.

Self-reporting of non-compliance is encouraged. LEI appreciates that raising concerns takes courage, but it is an important part of ensuring we do business with integrity. Prompt reporting may allow the Company to avoid or mitigate serious harm to the Company or others. LEI representatives may report suspected non-compliance through P-CO-9_Complaints Management Procedure.

Failure to follow the Code will result in appropriate disciplinary action, up to and including termination of employment or relationship with the Company.

FORMS: P-CO-9_Complaints Management Procedure

NAME:

DATE:

SIGNATURE: