

1. PURPOSE

The LEI Code of Conduct represents a commitment by all LEI representatives — including employees, contractors, consultants, agents, and non-executive directors — to operate to the highest standards of integrity, accountability, professionalism, and respect.

This Code ensures that our work reflects good governance, transparency, ethical practice, and positive outcomes for our clients, partners, and communities. It must be read together with all other LEI policies, procedures, and applicable laws.

2. RESPONSIBILITY

This Code applies to all LEI representatives, who are expected to:

- **Understand and comply** with the Code, LEI policies, and all applicable national and international laws.
- **Model LEI values** in all professional activities.
- **Take personal responsibility** for ethical conduct and decision-making.
- **Report suspected breaches** promptly through appropriate channels.
- **Leaders and managers** have a special duty to set the standard and foster a culture of accountability.

3. POLICY

CORPORATE VALUES

LEI operates under the following values:

- Integrity, honesty, and ethics.
- Creativity, innovation, and excellence.
- Respect for all individuals and cultures.
- Commitment to high-quality, sustainable outcomes.

Representatives must:

- Comply with all applicable laws and regulations in every jurisdiction of operation.
- Act transparently, and ethically in all dealings.
- Treat clients, colleagues, suppliers, and partners fairly and respectfully.
- Respect cultural differences and diversity.
- Honour commitments and maintain confidentiality.
- Deliver reliable, high-quality, and innovative services.
- Maintain safe, inclusive, and respectful workplaces.

ETHICAL PRINCIPLES

All representatives must:

- Ensure accuracy, transparency, and accountability in records, reports, and financial dealings.
- Reject corruption, fraud, money laundering, bribery, and undue influence.
- Disclose and properly manage any conflicts of interest.
- Protect confidential, proprietary, and personal information.
- Prevent all forms of discrimination, bullying, harassment, and victimisation.
- Promote gender equality, diversity, and inclusive workplaces.
- Avoid relationships with individuals or entities linked to terrorism, human trafficking, or unlawful activities.

CHILD PROTECTION

LEI maintains **zero tolerance for child abuse** and upholds the UN Convention on the Rights of the Child. All representatives must:

- Act in accordance of the UN Convention on the Rights of the Child.
- Treat children with dignity and respect at all times.
- Never engage in behaviour that is abusive, exploitative, or inappropriate.
- Avoid being alone with children.
- Never use children for labour that interferes with their education, development, or safety.
- Use technology responsibly and never exploit children online or offline.
- Immediately report any concerns or allegations of child exploitation or abuse.
- Disclose any past or current charges or convictions relating to child exploitation.
- Ensure children's images are used respectfully, with consent, and in compliance with law.

CONFIDENTIALITY AND DATA PROTECTION

Representatives must:

- Safeguard confidential, proprietary, and personal information entrusted to them.
- Use such information only for legitimate business purposes.
- Comply with privacy, data protection, and cybersecurity laws.
- Protect access to systems, passwords, and records.
- Never disclose sensitive information to unauthorised persons, including via social media.

FAIR COMPETITION

LEI supports free and open markets. Representatives must:

- Compete fairly and in compliance with competition and antitrust laws.
- Never engage in collusion, price-fixing, bid-rigging, or sharing sensitive market information.

HEALTH, SAFETY, HUMAN RIGHTS AND LABOUR STANDARDS

LEI is committed to maintaining safe, fair, and sustainable workplaces.

Representatives must:

- Never engage in or support forced labour, modern slavery, or exploitative practices.
- 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.
- Ensure working conditions are safe, fair, and free from harassment, discrimination, or abuse.
- Not use language or behaviour in the workplace that is harassing, abusive, sexually provocative, demeaning or culturally inappropriate.
- Respect the rights of individuals and communities affected by LEI's operations.
- Comply with all applicable labour and employment laws, as well as international human rights and labour standards.

SOCIAL MEDIA AND PUBLIC COMMUNICATIONS

Representatives must use social media and communications responsibly. They must:

- Avoid making statements on behalf of LEI unless authorised.
- Never post confidential, sensitive, or proprietary information online.
- Ensure personal communications do not damage LEI or LEI's clients' reputation or relationships.
- Use respectful and professional language in all contexts.

COMPLIANCE, REPORTING AND NON-RETALIATION

- All representatives must confirm in writing their commitment to comply with this Code.
- Suspected unlawful, unethical, or non-compliant behaviour must be reported promptly through appropriate channels (supervisor, Team Leader, Managing Director, or LEI [Whistleblower Platform](#)).
- Non-retaliation: Individuals who raise concerns in good faith are protected from retaliation. Retaliation against whistleblowers or witnesses will not be tolerated.
- All reports are independently reviewed and actioned by the Chair of the LEI Board.

Consequences: Failure to comply with this Code may result in disciplinary action, including termination of employment or engagement, and where required, referral to relevant authorities.

NAME:

DATE:

SIGNATURE: