

# CODE OF CONDUCT



October 2023

## **Introduction to the Code of Conduct**

The success of our organization is dependent on the trust and confidence we earn from our clients, employees, partners and shareholders. We gain credibility by adhering to our commitments, displaying honesty and integrity and reaching organizational goals solely through honorable conduct. It is easy to say what we must do, but the proof is in our actions. Ultimately, we will be judged on what we do.

## **Respect for the Individual**

We all deserve to work in an environment where we are treated with dignity and respect. Lafiya is committed to creating such an environment because it brings out the full potential in each of us, which, in turn, contributes directly to our business success. We cannot afford to let anyone's talents go to waste.

Lafiya is an equal employment/affirmative action employer and is committed to providing a workplace that is free of discrimination of all types and from abusive, offensive or harassing behavior. Any employee who feels harassed or discriminated against should report the incident to their manager or to human resources, or submit an anonymous complaint via [this form](#).

All Lafiya employees are also expected to support an inclusive workplace by adhering to the following conduct standards:

- Treat others with dignity and respect at all times.
- Address and report inappropriate behaviour and comments that are discriminatory, harassing, abusive, offensive or unwelcome.
- Foster teamwork and employee participation, encouraging the representation of different employee perspectives.
- Seek out insights from employees with different experiences, perspectives and backgrounds.
- Avoid slang or idioms that might not translate across cultures or sound offensive to other cultures.
- Support flexible work arrangements for co-workers with different needs, abilities and/or obligations.
- Confront the decisions or behaviours of others that are based on conscious or unconscious biases.
- Be open-minded and listen when given constructive feedback regarding others' perceptions of your conduct.

Lafiya will not tolerate discrimination, harassment or any behavior or language that is abusive, offensive or unwelcome.

## **Create a Culture of Open and Honest Communication**

At Lafiya everyone should feel comfortable to speak their mind, particularly with respect to ethics concerns. Managers have a responsibility to create an open and supportive environment where employees feel comfortable raising such questions. We all benefit tremendously when employees exercise their power to prevent mistakes or wrongdoing by asking the right questions at the right times.

Lafiya will investigate all reported instances of questionable or unethical behavior. In every instance where improper behavior is found to have occurred, the organization will take appropriate action. We will not tolerate retaliation against employees who raise genuine ethics concerns in good faith.

Employees are encouraged, in the first instance, to address any issues with their managers or the co-executive director responsible for HR ([celine.kamsteeg@lafiyanageria.org](mailto:celine.kamsteeg@lafiyanageria.org)), as most problems can be resolved swiftly. If for any reason that is not possible or if an employee is not comfortable raising the issue with their manager or HR, all Lafiya's co-founders do operate with an open-door policy.

### **Set Tone at the Top**

Management has the added responsibility for demonstrating, through their actions, the importance of this Code. In any business, ethical behavior does not simply happen; it is the product of clear and direct communication of behavioral expectations, modeled from the top and demonstrated by example. Again, ultimately, our actions are what matters. To make our Code work, managers must be responsible for promptly addressing ethical questions or concerns raised by employees and for taking the appropriate steps to deal with such issues. Managers should not consider employees' ethics concerns as threats or challenges to their authority, but rather as another encouraged form of business communication. At Lafiya, we want the ethics dialogue to become a natural part of daily work.

### **Selective Disclosure**

We will not selectively disclose (whether in one-on-one or small discussions, meetings, presentations, proposals or otherwise) any material nonpublic information with respect to Lafiya, its securities, business operations, plans, financial condition, results of operations or any development plan. We should be particularly vigilant when making presentations or proposals to potential or existent partners to ensure that our presentations do not contain nonpublic materials and information.

### **Proprietary Information**

It is important that we respect the property rights of others. We will not acquire or seek to acquire improper means of trade secrets or other proprietary or confidential information. We will not engage in unauthorized use, copying, distribution or alteration of software or other intellectual property.

### **Gifts, Gratuities and Business Courtesies**

Lafiya is committed to competing solely on the merit of our activities and services. We should avoid any actions that create a perception that favorable treatment of outside entities by Lafiya was sought, received or given in exchange for personal courtesies, which could include gifts, gratuities, meals, refreshments, entertainment or other benefits from persons or companies with whom Lafiya does or may interact. We will neither give nor accept business courtesies that constitute, or could reasonably be perceived as constituting, unfair business inducements that would violate law, regulation or policies of Lafiya or partners, or would cause embarrassment or reflect negatively on Lafiya's reputation.

For more information, please refer to our [Anti-bribery and Corruption Policy](#).

### **Accurate Public Disclosures**

We will make certain that all disclosures made in financial reports and public documents are full, fair, accurate, timely and understandable. This obligation applies to all employees, including all financial executives, with any responsibility for the preparation for such reports, including drafting, reviewing and signing or certifying the information contained therein. No business goal of any kind is ever an excuse for misrepresenting facts or falsifying records.

Employees should inform Executive Management and the HR department if they learn that information in any filing or public communication was untrue or misleading at the time it was made or if subsequent information would affect a similar future filing or public communication.

### **Corporate Recordkeeping**

We create, retain and dispose of our organizational records as part of our normal course of business in compliance with all Lafiya policies and guidelines, as well as all regulatory and legal requirements. All

corporate records must be true, accurate and complete, and organizational data must be promptly and accurately entered in our books in accordance with Lafiya's and other applicable accounting principles. We must not improperly influence, manipulate or mislead any unauthorized audit, nor interfere with any auditor engaged to perform an internal independent audit of Lafiya books, records, processes or internal controls.

### **Accountability**

Each of us is responsible for knowing and adhering to the values and standards set forth in this Code and for raising questions if we are uncertain about organizational policy. If we are concerned whether the standards are being met or are aware of violations of the Code, we must contact the HR department and/or a co-founder. Lafiya takes seriously the standards set forth in the Code, and violations are cause for disciplinary action up to and including termination of employment.

### **Do the Right Thing**

Several key questions can help identify situations that may be unethical, inappropriate or illegal. Ask yourself:

- Does what I am doing comply with the Lafiya guiding principles, Code of Conduct and organization policies?
- Have I been asked to misrepresent information or deviate from normal procedure?
- Would I feel comfortable describing my decision at a staff meeting?
- How would it look if it made the headlines?
- Am I being loyal to my organization and myself?
- Is this the right thing to do?