



JANINE GRANT
CONSULTING
RESEARCH. STRATEGY. ADVOCACY. MANAGEMENT

COMPANY

CODE OF CONDUCT

2021

COMPANY CODE OF CONDUCT

Purpose.

1. Our Company Code of Conduct outlines our expectations regarding employees' and consultants' behavior towards their colleagues, supervisors, our company and clients.

Scope.

2. This policy applies to all our employees and consultants regardless of contractual agreement or rank. Company employees and consultants are bound by their contract to follow our Code of Conduct while performing their duties.
3. We promote freedom of expression and open communication. Employees and consultants should avoid offending, participating in serious disputes and disrupting our workplace. We also expect employees and consultants to foster a well-organized, respectful and collaborative environment.

Integrity and accountability.

4. Employees and consultants are expected to:
 - a. Observe and abide by all applicable laws and regulations, both in the countries where our company is registered, and in the countries where we are doing business. All employees and consultants must protect our company's legality and reputation;
 - b. Be responsible when dealing with our company's finances, products, partnerships and public image, and conduct business in a truthful, honest, transparent and ethical manner. Employees and consultants should honor commitments and keep confidences and conduct themselves in a manner that will not reflect adversely on the company, our clients or business partners;
 - c. Treat clients, communities, stakeholders, colleagues and individuals with whom we work and interact, fairly, humanely and with proper regard for their human rights, and respect their cultural and other differences; and
 - d. Be accountable for their own conduct, and report violations of this Code of Conduct to their line manager or the company's Executive Director.

Respect and professionalism in the workplace.

5. Our company is committed to providing an open, diverse and inclusive workplace that is free of discrimination, so our employees can feel safe and happy. All employees and consultants should respect their colleagues and those with whom we work, regardless of background, race, religion culture or any other personal characteristic. Discrimination, harassment and bullying, in any form, are unacceptable and will not be tolerated.

6. All employees must show integrity and professionalism in the workplace, at company events or at any time when representing our company.

Grievances.

7. We encourage an open environment in which all employees and consultants are able to raise their work-related concerns, complaints or grievances fairly, honestly, and responsibly. In providing an equitable and productive work environment, we aim to resolve grievances transparently, promptly and consistently. If an employee or consultant feels uncomfortable approaching the matter directly with the person involved, or with the assistance of their line manager, they may raise the issue with the company's Executive Director to resolve.

Disciplinary actions.

8. Our company may have to take disciplinary action against employees or consultants who repeatedly or intentionally fail to follow our code of conduct. Disciplinary actions will vary depending on the severity of the violation. Possible consequences include: i) Demotion; ii) Reprimand; iii) Suspension or termination; iv) Detraction of benefits for a definite or indefinite period of time.
9. We may take legal action in cases of corruption, theft, embezzlement or other unlawful behavior.

Job duties and authority.

10. All employees should fulfill their job duties with integrity and respect toward clients, stakeholders and the community. Supervisors and managers must not abuse their authority. We expect them to delegate duties to their team members, taking into account competencies and workload. Likewise, we expect team members to follow team leaders' instructions and complete their duties with skill and in a timely manner. We encourage mentoring throughout our company.

Collaboration and communication.

11. Employees should be friendly and collaborative. They should try not to disrupt the workplace or present obstacles to their colleagues' work.
12. All employees should keep open lines of communication with their colleagues, supervisors or team members.

Conflicts of interest.

13. We believe in open and transparent business dealings. Employees and consultants must separate their own personal interests from those of the company, and we expect employees to avoid any personal, financial, or other interests that might hinder their capability or willingness to perform their duties effectively.

14. Actual or potential conflicts of interest must be reported immediately to your line manager or the company's Executive Director so that action can be taken to manage and mitigate the conflict of interest, including but not limited to the exclusion of the employee or consultant from any relevant decisions.

Anti-corruption, bribery, graft, and fraud.

15. Our company is committed to honest, transparent and fair business dealings and will not tolerate bribery including making facilitation payments and graft. We reject corruption and discourage employees from accepting gifts from clients or partners that would be deemed excessive beyond traditional or cultural practice (hosting of meals, paying of coffee/tea, etc.), as it may be mistaken to have the intention of influencing someone to secure a business advantage.
16. Employees and consultants are required to:
 - a. Reject corruption in all its forms, including bribery, making facilitation payments, or graft;
 - b. Ensure that no public official benefits financially or in any other unlawful way from the relationship with our company; and
 - c. Immediately inform their line manager or the company's Executive Director if information is discovered indicating that any form of corruption or fraud has been committed in connection with our company.
17. Employees and consultants must not:
 - a. Directly or indirectly, commit or attempt to commit, any illegal act, including bribery, graft or making a facilitation payment;
 - b. Directly or indirectly receive a bribe;
 - c. Use their authority for personal gain; or
 - d. Offer, provide or receive unlawful gifts, benefits, hospitality, advantages, courtesies or entertainment from a public official where a reasonable person could interpret the offer, provision or receipt as being corrupt.
18. We do not tolerate fraudulent activity, waste of our or our client's resources or abuse of authority by any of our employees or consultants. All employees and consultants must prevent, detect and report fraud, waste, abuse, or any other form of corruption about which they know or reasonably should have known. Concerns may be reported to the company's Executive Director. All employees and consultants are expected to cooperate fully if and when investigations are undertaken.

Benefits.

19. We expect employees to not abuse their employment benefits. This can refer to time off, insurance, facilities, subscriptions or other benefits our company offers.

Protection of company property.

20. All employees should treat our company's property, whether material or intangible, with respect and care. Employees and consultants:
 - a. Shouldn't misuse company equipment or use it frivolously;

- b. Should respect all kinds of incorporeal property. This includes trademarks, copyright and other property (information, reports etc.) Employees should use them only to complete their job duties.
- c. Should protect company facilities and other material property from theft, damage and vandalism.

Privacy protection and confidentiality.

- 21. Protecting sensitive and personally identifiable information and preventing its misuse is essential to the way our company operates, including ensuring compliance with relevant data protection legislation.
- 22. All employees and consultants are responsible for protecting sensitive and personally identifiable information from unauthorized access. Employees and consultants must protect the personally identifiable information they collect, handle, maintain and transmit and they must use proper collection, storage, transmission and disposal methods. Employees and consultants must be careful to neither access personally identifiable information they do not need to complete their job functions, nor disclose personally identifiable information to anyone who does not have authorization.
- 23. Failure to protect personally identifiable information may result in disciplinary measures or termination. All employees and consultants must notify their line manager or the company's Executive Director if they discover any actual or potential privacy breaches.

Duty of Care.

- 24. Employees and Consultants come under our company's duty of care, and we manage risks associated with the performance of work. So far as is reasonably practicable, we are responsible and accountable for the health, safety and security of individuals contracted by us in the performance of their work. When employees or consultants are travelling, we follow the Government of Singapore's and our client's government's travel advice.

Child Protection.

- 25. Our company is committed to upholding the values and purpose of the UN Convention on the Rights of the Child, which requires that children will be protected from performing any work that is likely to be hazardous, interfere with a child's education, or is harmful to a child's physical, mental, spiritual, moral, or social health.
- 26. We have zero tolerance of child abuse and exploitation. When undertaking company business that involves working or contact with children, employees and consultants are expected to adhere to the following behaviours while they are performing those duties:
 - a. Treat children with respect regardless of race, colour, gender, language, religion, national, ethnic or social origin, or other characteristic;
 - b. Whenever possible, ensure that another adult is present when working near children;
 - c. Never use any computers, mobile phones, video cameras, cameras or social media to exploit or harass children, or access child exploitation material through any medium;
 - d. Refrain from physical punishment or physical discipline of children;
 - e. Refrain from hiring children for domestic or other labour;

- f. Comply with all applicable laws, rules and regulations concerning child protection, including laws in relation to child labour.
 - g. Not use language or behaviour towards children that is inappropriate, harassing, abusive, sexually provocative, demeaning or culturally inappropriate;
 - h. Never engage children in any form of sexual activity. Mistaken belief in the age of a person is not a defence;
 - i. Not invite unaccompanied children into their home or place of residence;
 - a. Not sleep close to unsupervised children (noting that this does not apply to an individual's own children);
 - j. Never supply controlled drugs to children for use, trafficking or importing; and
 - k. Immediately report concerns or allegations of child exploitation and abuse and policy non-compliance to our company's Executive Director.
27. When photographing or filming a child for work-related purposes, employees and consultants will:
- a. Assess and endeavour to comply with local traditions or restrictions for reproducing personal images before photographing or filming a child;
 - b. Explain how the photograph or film will be used and obtain consent from the child's parent or legal guardian before photographing or filming a child;
 - c. Ensure photographs and films however recorded and stored 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;
 - d. Ensure images are honest representations of the context and the facts; and
 - e. Ensure that physical and electronic labels of photographs and films do not reveal identifying information about a child when sending images electronically or publishing images in any form.
28. It is the responsibility of employees and consultants to use common sense and good judgment to avoid actions and behaviours that could be construed as child abuse.

Prevention of Sexual Exploitation, Abuse and Harassment.

29. Sexual exploitation, sexual abuse, and sexual harassment are unacceptable and prohibited conduct for all employees and consultants. Employees and consultants must not engage in any act of sexually humiliating, degrading or exploitative behavior, or engage in an exchange of money, employment, goods or services for sex regardless of whether or not this is illegal in the country they are working in.
30. Our company encourages an environment that prevents sexual exploitation, abuse and harassment, and all employees and consultants must report any concerns regarding sexual exploitation, abuse, and harassment to either their line manager or the company's Executive Director.