MARY DINAH
foundation

GLOBAL CODE OF CONDUCT

Mary Dinah Foundation

Introduction

Employees and volunteers play a crucial role in ensuring that the Mary Dinah Foundation (MDF) remains true to our values and maintains a respected and credible brand. This Code of Conduct outlines the standards and expectations for employees and volunteers regarding professional ethics, integrity, representation, and safeguarding, all of which support our vision, purpose, and values. It overarches all MDF policies and procedures guiding conduct and behavior, all grounded in MDF's People First principles.

Our Code of Conduct empowers all MDF employees worldwide to make ethical decisions that positively impact our work. This Code applies to everyone at MDF. References to "we," "our," or "us" include all employees, whether at Headquarters or in Field Offices. The Code provides an overview of operating principles, guidelines, and the legal and ethical standards we are expected to follow daily. As ambassadors of the MDF brand, we must uphold the organization's standards of honesty, integrity, excellence, and responsible behavior.

While business practices and customs may vary, certain guidelines and standards are universal across MDF, regardless of location. We operate in countries worldwide, with colleagues who are citizens of nations with unique laws, regulations, and customs; however, we are committed to upholding the highest ethical standards that transcend national boundaries.

As employees, directors, and officers of MDF, you are required to read, commit to, and adhere to the Code of Conduct as a condition of your employment. This Code is a cornerstone of our culture, values, and commitment to our staff, partners, and clients. Violating these principles may result in termination of employment. You will be asked to review and acknowledge your commitment to these principles annually in writing. If you suspect any employee, donor, supplier, vendor, customer, or manager is violating these principles, you are responsible for reporting this to your manager or Human Resources immediately.

This Code of Conduct applies to all employees, volunteers, consultants, agency workers, and partners working with or on behalf of MDF.

Individual Responsibility: You are expected to demonstrate personal integrity and live the values and behaviours that underpin all of our work. Specifically, each employee is required to comply with our code of conduct. It's your responsibility to stay informed by learning the standards of conduct that apply to your role and participating in ethics and compliance training sessions. Seek guidance and consult with others when the appropriate course of action is unclear. Stand firm by resisting pressure to compromise our standards or cut ethical corners to meet an objective and raise concerns if something doesn't seem right.

Line Manager responsibility: Lead by example and be a positive role model to others, promote awareness of the standards and encourage the sharing of concerns. Coach the team, monitor conduct and be responsive to anyone who raises an ethics or compliance concern and ensure there is no retaliation from reporting.

Partners & Agency Workers: We want to do business with partners who share our values. We strongly encourage all our partners to adopt clear commitments on ethical conduct like those in our Code, and any party operating on MDF's behalf must ensure that their actions comply with our code of conduct and policies. If you are responsible for a relationship with a partner, you should make sure their commitments meet our standards.

Our Values:

- **Collaboration:** We empower marginalized communities to take control of their development by sharing skills and knowledge. Our collaborative partnerships drive sustainable change, innovation, and impact**.**
- **Integrity:** We uphold honesty, ethics, and fairness in everything we do, treating everyone with respect and care. We hold ourselves to the highest ethical standards and strive to leave every situation better than we found it.
- **Inclusion:** We stand alongside those who have been denied choice and opportunity, championing diversity and equality in all our work. We value inquisitive perspectives and encourage different voices.
- **Teamwork:** Our success comes from working together as a global team. We value each person's contribution, support one another, and share responsibilities. We foster open and timely communication, offering and asking for help when needed.
- **Commitment:** We are dedicated to ensuring that every child has access to good nutrition, believing that a good life begins with being well-fed. We won't stop until this is a reality for everyone**.**

The Code in Context

While we educate ourselves and our partners on ethical behavior, it's important to recognize that this Code is not intended to provide specific guidance for every situation we may encounter on our path to success. Instead, it serves as a framework to guide us towards legal, ethical, and compliant actions and provides principle-based guidance to encourage consultation with relevant parties and speaking up when needed. Reporting a violation is not an easy decision, which is why we rely on a decision-making process to support us in doing the right thing. In instances where local laws or regulations are more restrictive than this Code, local laws or regulations take precedence. Additionally, policies from Headquarters, the Employee Handbook, and local policies provide supplemental guidance to complement the principles outlined in this Code of Conduct.

Discrimination

We celebrate diversity, value each other, and do not tolerate discrimination or harassment. We uphold the MDF Code of Conduct by establishing, maintaining, and developing relationships based on trust and respect, while exhibiting professional and personal integrity and honesty at all times. We demonstrate sensitivity towards the customs, practices, cultures, and personal beliefs of others and promote adherence to MDF policies that support equality of opportunity, diversity, social inclusion, and respect for human rights. Compliance with MDF's data protection policy is essential, and we are committed to observing confidentiality regarding information disclosed during employment. This includes ensuring conversations are not overheard in public spaces and refraining from sharing confidential information, as many agreements require us to protect third-party and MDF information. Any breach of confidentiality is considered a disciplinary offense. We are responsible for supporting and challenging others if we suspect unlawful or unethical conduct and are expected to dress appropriately both within the workplace and when representing the organization. Additionally, any concerns about bribery or corruption must be promptly reported.

Equal Employment Opportunity Policy

This Equal Employment Opportunity Policy (EEO) reaffirms the policy and commitment of the Foundation to provide equal employment opportunities for all employees and job applicants. The Foundation endorses and will follow our EEO Policy in implementing all employment practices, policies, and procedures. The Foundation will recruit, hire, train, and promote persons in all job titles without regard to race, color, religion, national origin, sex, age (except where sex or age is a bonafide occupational qualification, as defined by law), sexual orientation, or physical or mental disability (except where the disability prevents the individual from being able to perform the essential functions of the job and cannot be reasonably accommodated in full compliance with the law). The Foundation will make employment decisions so as to further the principle of equal employment opportunity. The Foundation will also ensure that all personnel decisions and actions, including but not limited to compensation, benefits, transfers, promotions, layoffs, returns from layoff, terminations, Foundation-sponsored training, education, tuition assistance, and social and recreation programs, will be administered without regard to race, color, religion, sex, age, national origin, sexual orientation, or disability. All employees are expected to comply with our Equal Employment Opportunity Policy. Managers who are responsible for meeting objectives are expected to cooperate fully in meeting our equal employment opportunity objectives and their overall performance will be evaluated accordingly. Employee suggestions, problems, or complaints regarding alleged violations of this policy should be reported to the managing director immediately.

Safeguarding

We take responsibility to ensure that our people, partners, programmes, and projects do no harm. We uphold the MDF Code of Conduct by ensuring that we do no harm to children, young people, vulnerable adults, or anyone we engage with through MDF, whether through action or omission. We are committed to not exposing others to the risk of discrimination, neglect, harm, or abuse, and we do not purchase or coerce sex acts. We work in accordance with health, safety, and security guidelines and avoid behaviors that create unnecessary risk to ourselves or others.

Sexual Harassment Policy

The Foundation is committed to providing an environment free from sexual and sexbased harassment. It is against the policy of the Foundation for any employee, whether a manager or co-worker, to sexually harass another employee. This policy extends to the treatment of beneficiaries, host communities, board members, donors, volunteers, vendors, service providers, and other affiliates of the Foundation. This policy also prohibits soliciting commercial sexual activities from beneficiaries or within host communities the Foundation works with. Sexual harassment or sex-based harassment occurs when unwelcome conduct of a sexual nature becomes a condition of receiving or retaining particular benefits of employment or creates an intimidating, hostile, or offensive working environment. While the following is not intended to be a complete list, examples of sexual and sex based harassment may include, but are not limited to: • Requests for sexual favors, whether expressed or implied • Unwanted physical contact, including touching, hugging, pinching, or brushing the body • Verbal harassment, such as sexual innuendoes, suggestive comments about one's body or sexual prowess, jokes of sexual nature, sexual propositions, and threats • The use of sexually degrading or otherwise demeaning, non-professional references to women or men • Non-verbal conduct, such as a display of sexually suggestive or degrading objects or pictures, leering, ogling, whistling, or obscene gestures • Acts of physical aggression, intimidation, hostility, or threats. Any employee who believes he or she has been sexually harassed should report the conduct to the managing director. If the managing director is engaging in the conduct, or if other circumstances exist which cause the employee to believe discussion with the managing director would be inappropriate, report the conduct to the board of directors. Additionally, any employee who has knowledge of behavior that could be construed as sexual harassment is required to report the conduct to the managing director. A prompt and impartial investigation of all complaints will be conducted. Confidentiality will be maintained to the extent possible without hindering the thoroughness of the investigation. Any employee of the Foundation who has been found, after an appropriate investigation, to have sexually harassed another employee will be subject to disciplinary action up to and including termination.

Harassment Policy

In providing a productive working environment, the Foundation believes that its employees should be able to enjoy a workplace free from all forms of discrimination, including harassment on the basis of race, color, religion, gender, national origin, age, and disability. It is the Foundation's policy to provide an environment free from such harassment. It is against the policy of the Foundation for any employee, whether a manager or subordinate, to harass another employee. This policy extends to the treatment of board members, donors, grantees, volunteers, vendors, service providers, and other guests of the Foundation. Prohibited harassment occurs when verbal or physical conduct that defames or shows hostility toward an individual because of race, color, religion, gender, national origin, age, or disability, or that of the individual's relatives, friends, or associates creates or is intended to create an intimidating, hostile, or offensive working environment; or is intended to interfere with an individual's work performance; or otherwise adversely affects an individual's employment opportunities. Harassing conduct includes, but is not limited to: • slurs, negative stereotyping, or threatening, intimidating or hostile acts, which relate to race, color, religion, sex, age, national origin, sexual orientation, or disability • Written or graphic material that defames or shows hostility or aversion toward an individual or group because of race, color, religion, sex, age, national origin, sexual orientation, or disability and that is placed on walls, bulletin boards, or elsewhere, or that is circulated in the workplace. The Foundation considers workplace bullying unacceptable and will not tolerate it under any circumstances. The Foundation defines bullying as persistent, malicious, unwelcome, severe and pervasive mistreatment that harms, intimidates, offends, degrades or humiliates and employee, whether verbal, physical or otherwise, at the place of work and/or in the course of employment. Any employee who believes he or she has been harassed in violation of this policy should report the conduct immediately to the managing director; or, if that person is responsible for the harassment, to the board of directors. A timely and impartial investigation of all complaints will be conducted in a confidential manner. Confidentiality will be maintained to the extent possible without hindering the thoroughness of the investigation. Any employee of the Foundation who has been found, after appropriate investigation, to have harassed another employee in violation of this policy will be subject to disciplinary action up to and including termination.

Trafficking In Persons, Sexual Exploitation, and Abuse

MDF is committed to preventing trafficking in persons and sexual exploitation and abuse in our programs and engagements with partners around the globe. Far from being a soft issue, trafficking - a modern day form of slavery -constitutes a violation of human rights in which victims are deprived of their fundamental freedoms. Trafficking in Persons is a criminal offense that exists in most countries in which MDF operates. Such acts expose MDF, its employees, and business partners to the risk of prosecution, fines, and imprisonment, as well as endangering MDF's reputation. MDF has a zero-tolerance approach to acts of perceived or actual human trafficking

by any of its employees or by business partners working on its behalf. Always be alert to possible human rights violations and always check your actions to ensure that they do not violate or contradict any of the basic Trafficking in Persons principles noted above. If you suspect a human rights abuse within MDF, report it immediately. **MDF WILL NOT TOLERATE HARASSMENT, INTIMIDATION, OR RETALIATION AGAINST ANYONE WHO:**

- Filed a complaint
- Assisted or participated in an investigation;
- Opposed any unlawful act or practice by any federal, state, or local laws requiring equal opportunity; or
- Exercised any other legal right protected by federal, state, or local law requiring equal opportunity.

MDF expects all employees and partners to refrain from:

- Engaging in any form of trafficking in persons
- Soliciting or paying for sex
- Forcing anyone to work against their will
- Withholding, misusing, destroying, concealing, or otherwise denying access to the employee's identity or immigration documents (e.g., passports, driver's license, other forms of identification)
- Misrepresenting a job while recruiting or hiring for fee or bribe
- Developing physical or sexual relationships with children

Sexual exploitation and abuse by any MDF employee, consultant, subcontractor, supplier, or partner constitutes gross misconduct and is grounds for immediate termination or end of partnership.

Anti-Retaliation

MDF will not tolerate retaliation against anyone who, in good faith, reports a concern or participates in an investigation, even if the allegation ultimately is not substantiated. Anyone found to have engaged in retaliatory conduct against someone will be subject to disciplinary action, and possibly termination.

General Safety/Security

A safe environment for employees and visitors is of the utmost concern to the Foundation. Accordingly, all employees must conduct themselves in a manner that considers their own safety as well as that of co-workers and visitors. In the event of an emergency, such as a fire, proceed to the designated areas immediately. Emergency evacuation routes are posted throughout the building. Please review the posting for your area and know where you are to go in the event of an emergency. Employees should also be aware of the importance of keeping the workplace secure. Doors that are supposed to be locked should be kept locked when not in use after business hours. All employees are to safeguard the assets, property, and information of the Foundation to

the most reasonable extent. However, no employee is to ever jeopardize his or her own safety or the safety of any other employee or visitor. Please notify the managing director if you have a concern regarding any security issue.

Weapons in the Workplace

MDF prohibits all persons from carrying or transporting a handgun, firearm, or legally controlled or prohibited weapon of any kind onto company property, regardless of whether the person is licensed to carry the weapon. Employees are also prohibited from carrying a weapon while performing their job for MDF, whether they are on MDF property at the time or not, and whether they are licensed to carry a handgun or not. Weapons are prohibited at any MDF-sponsored function. Prohibited weapons include any form of weapon or explosive restricted under local, state, or federal regulation. This includes all firearms, illegal knives, or other weapons covered by the law (legal chemical-dispensing devices such as pepper sprays that are sold commercially for personal protections are not covered by this clause).

Smoke-Free and Tobacco-Free Policy

It is the Foundation's intent to provide a healthful environment for our employees and visitors; therefore, Foundation property has been designated a smoke-free and tobacco-free environment. The use of any tobacco or smoking-related product, including the use of smokeless tobacco products or electronic cigarettes, is prohibited on Foundation property. All employees and visitors must make a good faith effort to maintain this environment in the best interest of all concerned.

Drug And Alcohol Abuse Policy

The use and abuse of drugs and alcohol can seriously impair your ability to perform your duties safely and efficiently. Drug and alcohol use and abuse not only jeopardize the public's and co-workers' safety, they undermine the public's confidence in the Foundation. Because a drug or alcohol-impaired employee can pose a significant threat to the safety of the public and co-workers, as well as the employee's own safety, the Foundation has established this policy as part of its ongoing efforts to maintain a drug and alcohol-free workplace. All employees are expected to report to work free of alcohol and illegal drugs. The unauthorized use, possession, sale, distribution or transfer of illegal drugs is strictly prohibited. Consumption of alcohol on Foundation premises during work hours is prohibited. Any employee violating this policy is subject to discipline, up to and including termination, for a first offense. To assist employees in overcoming drug abuse problems, the Foundation may offer the following rehabilitative help: Information about community resources for assessment and treatment and Counseling programs.

General Rules of Conduct

We believe that our employees are and will continue to be good citizens, both in the community and on their jobs, and that they ordinarily will not engage in acts contrary to the best interests of themselves or other employees of Foundation. However, in instances in which employees do engage in conduct contrary to these interests, they will receive discipline appropriate for such misconduct. Conduct contrary to these interests includes illegal activities, including activity in which the employee has pleaded "no contest". The degree of discipline in each case, up to and including discharge, will be determined by the severity of the situation involved. If during the course of your employment a performance problem is detected, your supervisor will discuss the problem with you and offer any appropriate assistance needed to remedy the situation. If the performance problem continues, the normal steps of disciplinary action by the Foundation will be verbal warning, written warning, written probation, and ultimately, termination of employment. Employees also may receive a suspension in appropriate circumstances as a final disciplinary action prior to termination. If you have successfully completed a probationary period but revert to the problem that warranted the probation, you may be subject to termination without repeating the foregoing steps of disciplinary action. Furthermore, if you engage in misconduct deemed serious enough, you may be subject to immediate suspension and/or termination without administration of the sequential steps of discipline. The following set of rules and regulations is intended to serve as a general guideline in governing appropriate employee behavior. The list is not intended to include all offenses for which an employee may be disciplined or discharged. Performance Rules • Always make your best effort in your work. • You are expected to meet reasonable standards of efficiency, productivity, and performance. • You are expected to work the time you are paid and to promptly notify the managing director and/or your supervisor when you will be late or absent. • Do not threaten, intimidate, coerce, provoke, interfere, or fight with employees, management, or visitors at any time. • Do not make false or malicious statements about employees, management, or the Foundation Board of Directors at any time. • The use of profane or abusive language is not permitted in any situation. Property of Others • Do not abuse, misuse, damage, destroy, sabotage, or steal Foundation property, equipment, or the property of other employees. • The use of Foundation supplies or equipment for personal purposes is not permitted. Honesty • Do not falsify or fail to disclose completely all information requested or recorded on any employment, personnel, or benefits form, or other record of the Foundation. • Do not alter, misuse, or remove from the Foundation premises, without proper authorization, Foundation records, checks, or confidential information of any nature. • Do not falsify employee time or vacation records by recording hours as worked that are not actually worked. Do not complete any employee time records other than your own. Condition of Company Premises • Keep your work area safe and clean at all times. Other Rules • Gambling on Foundation premises is strictly prohibited. Gambling includes lotteries, punch boards, check pools, and raffles. • The possession of guns or other lethal weapons is strictly prohibited • Do not post or remove

notices, signs, or any written or printed material on or from bulletin boards or elsewhere on Foundation property at any time without advance permission. • Always report any mistake by you or another person that could affect the Foundation's operations.

Expected Conduct Overseas

Employees, while oversea, are expected to show respect for its conventions, customs, and institutions, to abide by applicable laws and regulations, and not to interfere in its internal political affairs. MDF carries out important work on behalf of various government agencies and other international donors. As such, MDF is committed to ensuring that our operations and those of our employees will be carried out in such a manner as to be fully commensurate with the responsibility which this entails.

Channels for Raising Concerns

Every situation is unique, and no code can address every possible scenario. If you are ever in doubt about how to make the right decision, seek help or advice. Report any breaches of this Code immediately through the established reporting mechanisms: speak with your manager, a more senior manager, or an HR representative who acts as your designated safeguarding officer. You can also reach out to the Head of Internal Audit and Risk Management or an internal lawyer. If the concern involves a member of the Board of Trustees, contact the Managing Director.

Anti-Trust and Anti-Bribery Laws

Everyone must comply with antitrust laws that regulate the conduct and organization of business to promote fair competition for the benefit of consumers. MDF, like any other organization, is subject to international laws, especially of those countries where we operate, that prohibit bribery in virtually every kind of commercial setting. The rule is simple – don't bribe anybody, anytime, for any reason.

Confidentiality, Proprietary Information, and Intellectual Property

MDF operates in the highly competitive field of international development and is committed to safeguarding its knowledge products and proprietary information. Employees are expected to maintain confidentiality and must not share MDF materials with anyone outside the organization. "Confidential information" includes any data, information, or documentation that is valuable to MDF, its affiliates, or clients and is not generally known to the public. This encompasses business and proposal strategies, proposal-specific details, partner information, use of technologies and platforms for business development, consultant and staff information, financial data, supply and service details, marketing and strategic positioning, and client-customer and project information. All employees are responsible for protecting sensitive Foundation information, which is vital to our work and those we serve. This includes confidential details related to accounting, personnel information (such as salaries, employee and applicant data), business plans and strategies,

contracts, proposed programs, and other information that could potentially harm the Foundation, its employees, donors, or associated parties. Unless explicitly identified otherwise by the managing director, employees should assume all such information is confidential. Compliance with this policy is a condition of continued employment with MDF.

Conflicts of Interest

The Foundation expects the primary interest of employees to be the people and programs we serve. Employees are expected to abide by the Conflict of Interest Policy adopted by the board of the Foundation, including the Statement of Affirmation and the Conflict of Interest Disclosure Statement.

Outside Business Interests

Before engaging in any outside business interests discuss with the managing director. In the course of day-to-day performance of professional responsibilities, it is anticipated that Foundation employees will develop skills and expertise that would benefit the community at large. It is the Foundation's position that this knowledge and expertise should be available to those groups or individuals who would benefit from this expertise. In most cases, individual consulting by Foundation employees is acceptable as long as the consulting does not interfere with job performance or Foundation's interests. In no event shall an employee accept consulting fees or other payments from a vendor, donor, or nonprofit organization for service that would fall within the normal purpose of the Foundation. If outside business interest or employment is a direct result of knowledge gained as a Foundation employee, such activities must meet the following criteria: 1. The employee seeks the approval of the managing director prior to accepting the consulting engagement; 2. The preparation for and performance of work is not done on Foundation time; 3. Foundation materials or supplies are not used; 4. Employees make it clear they are consulting as individuals, not as Foundation employees. If the above criteria are not met, the managing director may request the employee not accept, or end, the outside business interest. Employees may retain compensation generated from outside business interests performed outside of work hours.

Political Activities

Employees and non-employees are prohibited from using MDF's resources for personal political activities. Our work involves a great deal of engagement with people and communities. While MDF supports and encourages involvement in community activities, we cannot use company funds or resources, or receive company reimbursement, for personal political activities, including contributions to political candidates or parties. We cannot represent our individual political affiliations as those of MDF and must avoid even the appearance of endorsing, supporting, or opposing a political position, candidate, agenda, product, or party. MDF is cognizant of and follows the political contributions reporting requirements.

Gifts, Gratuities

At no time may an employee solicit or accept a personal monetary or nonmonetary gift, gratuity, credits, or preferential treatment from any individual or organization doing business with the Foundation, including vendors, donors, and nonprofit organizations. Employees shall not solicit from any donor to be named in an estate, will, or trust. Any employee who has knowledge of being named as a beneficiary of a donor's estate, will, or trust as a result of their work at the Foundation must disclose that immediately to the managing director (or, in the case of the managing director, to the board). Specific details of the bequest must be provided in writing and a determination of the presence of a conflict of interest will be given. This extends to former employees if the donor relationship was a result of their past employment with the Foundation. The Foundation maintains a strict conflict of interest policy for its board, staff, and volunteers to ensure independence and integrity.

Relationship Conflicts

MDF staff must report any relationship conflicts and seek clarification if unsure. If a personal relationship exists, has existed, or develops between employees or volunteers where one party has management or supervisory responsibility over the other, this relationship should be disclosed to the relevant senior manager. Managers who have, or have had, a personal relationship with an employee or volunteer should refrain from participating in any recruitment, selection, performance review, promotion, or other processes that could be perceived as giving an unfair advantage or disadvantage to the individual involved. It is the responsibility of all employees and volunteers engaged in recruitment and selection to declare any such relationships.

Bribery And Corruption: Government And Political Bodies

MDF does not tolerate bribery or corruption in any form. We never offer, authorize, or accept bribes, including 'facilitating payments'—small payments made to expedite routine government actions—or any other improper payments intended to gain a benefit. We adhere strictly to the MDF policy on gifts and entertainment. We ensure that all accounts and financial records are complete and accurate, with clear documentation of each transaction, and that no undisclosed, unrecorded, or vaguely described transactions occur. Any requests for cash payments to government officials, regardless of amount, must be referred to the MDF internal lawyer.

Relationships with Customers, Suppliers and Other Partners

MDF expects its partners to uphold the same core principles outlined in this Code of Conduct. In procurement activities, we must act ethically, impartially, and objectively. It is crucial to adhere to procedures related to segregation of duties, documentation and transparency, conflicts of interest, gifts and bribes, and confidentiality. All procurement activities must comply with MDF's

Code of Conduct and relevant HR policies. Additionally, we should actively encourage our suppliers to adopt and apply the same core principles in their operations.

Accounting For Time and Expenses

MDF operates on behalf of various donors and government agencies, making accurate time and expense recording a requirement and condition of employment. We must be meticulous in reporting and tracking our work, ensuring proper allocation of expenses to the correct accounts. All employees are required to record their time and travel regularly and accurately, and to maintain their expense and travel receipts to ensure compliance with internal policies and audit requirements. Employees are responsible for accurately completing their expense reports and providing all necessary explanations and documentation, including original receipts for all expenses. Incomplete or incorrect documentation will result in the rejection of the expense report by the finance department until corrected. A check will not be issued until the report is corrected. All expense reports must be signed by the employee and approved by their supervisor, who is responsible for reviewing the report. Expense reports should ideally be submitted monthly, although quarterly submissions are also acceptable.

Electronic Mail Policy

Unacceptable Uses of E-mail System Use of the Foundation's e-mail system for non-business, personal communication purposes is discouraged. Occasional personal use may not become unreasonable or otherwise interfere with productivity. In no event will an employee be allowed to transmit, retrieve, or store any information that may violate applicable copyright laws or that may be considered defamatory, discriminatory, or harassing in nature. Accordingly, employees are strictly prohibited from using the company's e-mail system for any of the following purposes: • Transmitting any messages containing obscene, derogatory, harassing, or inflammatory remarks about an individual or group's race, color, religion, national origin, age, disability, or other characteristic or attribute not related to their job performance • Transmitting any abusive, profane, or offensive language • Transmitting any information that the employee knows or has reason to believe may be false, misleading, or libelous • Sending or posting any chain letters, solicitations, or personal correspondence not directly related to some business purpose or activity • Using the Foundation's e-mail system for any political or religious causes or activities not specifically related to Foundation business • Using the Foundation's e-mail system for personal gain, including the solicitation of, or engagement in, any noncompany business • Using the Foundation's e-mail system for any other purpose that is illegal, that may damage the Foundation's reputation, or that is otherwise contrary to the Foundation's best interest. It is expected that all employees will use sound judgment when utilizing the e-mail system. As such, each employee is responsible for the content of all data, text, audio or images that they place on, forward, or send over the Foundation's e-mail system. Employees are prohibited from sending any e-mail or other electronic communication that attempts to conceal his or her identity or

misrepresent the sender as someone else. Further, any information sent by an employee to an individual or entity outside of the Foundation via an electronic network (e.g., bulletin board, online service, etc.,) may be viewed as a statement that may reflect on the Foundation and its image. Personal "disclaimers" in electronic messages are insufficient. Conversely, no employee of the Foundation is expected to open an unsolicited e-mail message he/she believes, by its source or subject, could be inappropriate or offensive. If such e-mail is received, the employee may ask the managing director to open the suspect e-mail. Inappropriate or offensive e-mail communications should be reported immediately to the managing director. Users should be aware that, despite having a system password, employees do not have an expectation of privacy in messages they create or receive, and messages may be monitored by management. Such messages also may be subject to disclosure to outside third parties, including the court system and law enforcement agencies, under certain circumstances. Employees should not send any e-mail messages they would not want to have seen by persons other than the intended recipients. Violations of this policy will subject an employee to appropriate disciplinary action up to and including termination of employment.

Internet Access

As a general rule, it is expected that all employees will use sound judgment when utilizing Internet access. Internet usage should be for professional, Foundation related reasons. Employees are responsible for seeing that the Internet is used in an effective, ethical, and lawful manner. An employee's Internet access privileges must not be abused or otherwise interfere with his/her productivity. Therefore, use of the Internet for personal use is discouraged. Additionally, solicitation of, or engagement in, non-company business, or any use of the Internet for personal gain or advancement of individual views is strictly prohibited. Employees are also expressly prohibited from visiting Web sites that may contain materials that may in any way be considered obscene, profane, lewd, derogatory, or otherwise inappropriate for a business environment. Accordingly, employees are also expressly prohibited from viewing, downloading, transmitting, retrieving, storing, or printing any materials from the Internet that are obscene, profane, lewd, derogatory, or otherwise inappropriate for a business environment.

Social Media Policy

The Foundation encourages staff, to explore and engage in social media communities as part of your professional work, focusing both on adding real value to online conversations and learning from others. Approach online conversations the same way you approach face-to-face, telephone or e-mail conversations – use sound judgment, be helpful and respectful. Remember that you have sole responsibility for what you post or publish in any form of online social media. Communicate only about what you know. Only share information that you are certain is 100 percent accurate. Do not make assumptions or share information heard in passing or in conversation with a third party. If in doubt, err on the side of caution.

Representing The Foundation to The Press and Public

Through its programs and services, the Foundation places special emphasis on public affairs, education, poverty, unemployment and other areas of concern to the community. For the purpose of speaking with a consistent and accurate voice in these broad interests, responsibility for responding to inquiries from outside the Foundation should be limited to the managing director or his/her designee. The managing director will also respond to the press and public on matters of general policy and philosophy and on any and all matters of the Foundation, as deemed advisable. If someone from the media approaches staff, other than the managing director, and asks for a comment, the appropriate response is to tell them that “I have not been authorized to be the spokesperson for the Foundation. Please contact the managing director who will be able to help you”. The managing director or his/her designee will then respond or put them in touch with the designated spokesperson.

Global Code of Conduct Agreement

Acceptance Form

I confirm that I have received, read and understood the MDF Global Code of Conduct which include guidelines on:

- Discrimination
- Equal Employment Opportunity Policy
- Safeguarding
- Sexual Harassment Policy
- Harassment Policy
- Trafficking In Persons, Sexual Exploitation, and Abuse
- Anti-Retaliation
- General Safety/Security
- Weapons in the Workplace
- General Rules of Conduct
- Expected Conduct Overseas
- Channels for Raising Concerns
- Anti-Trust and Anti-Bribery Laws
- Confidentiality, Proprietary Information, and Intellectual Property
- Conflicts of Interest
- Outside Business Interests
- Political Activities
- Gifts, Gratuities
- Relationship Conflicts
- Bribery And Corruption: Government And Political Bodies
- Relationships with Customers, Suppliers and Other Partners
- Accounting For Time and Expenses
- Electronic Mail Policy
- Internet Access
- Social Media Policy
- Representing The Foundation to The Press and Public
- Smoke-Free and Tobacco-Free Policy
- Drug And Alcohol Abuse Policy

- I confirm that I understand that they form part of the Terms and Conditions of my employment/volunteering contract

- I confirm that I shall undertake to act in accordance with the code at all times

- I confirm that I understand that I should contact my manager, the compliance team, legal or the whistleblowing email if I require guidance or additional assistance in applying the code to a particular situation.

- I confirm that I understand that I may be required each year to sign the Code of conduct acceptance form to confirm that I have read and understood and applied it when carrying out my responsibilities at MDF.

- I understand that failure to comply with the above will result in disciplinary action under MDF's disciplinary procedure for employees or a volunteer status review

I have read, understood and agree to abide by MDF's Global Code of Conduct.

Name: _____

Role: _____

Program/Department: _____

Signature: _____

Date: _____

Please return your completed form to your manager.

Date of last review: 1st September 2024
Date of next review: 1st October 2027