

CODE OF CONDUCT

Stichting Lex Populi (LP) Stichting Lex Populi ("LP") is committed to conducting its activities with integrity, respect for human rights, accountability, professionalism and compliance with applicable law. This Code of Conduct establishes the standards expected of LP's board members, directors, employees, consultants, contractors, agents and other persons acting on behalf of LP (collectively, "LP Associates"). The Code should be read together with LP's governing documents and applicable policies and procedures.

1. LP Associates will uphold high ethical and professional standards and conduct themselves with honesty, integrity, loyalty, fairness, dignity and respect toward colleagues, beneficiaries, clients, donors, sponsors, partners, suppliers and other persons with whom LP interacts.
2. LP Associates will comply with all applicable laws and regulations of the Netherlands, the European Union and the countries in which LP operates or conducts activities. LP Associates will also comply with LP's governing documents, policies and procedures, including those concerning financial management, conflicts of interest, safeguarding, data protection, procurement, anti-corruption, sanctions and reporting of misconduct. Where applicable law and an LP policy differ, the stricter requirement will apply to the extent permitted by law.
3. LP Associates will perform their duties honestly, diligently, competently and in good faith, and will act in accordance with their contractual responsibilities. LP Employees may engage in lawful outside activities, provided that such activities do not materially interfere with their duties to LP, create an actual or potential conflict of interest, involve misuse of LP resources or confidential information, or otherwise compromise their ability to perform their responsibilities objectively and professionally. Employees will disclose any outside activity that may reasonably give rise to a conflict of interest.
4. LP Associates undertaking assignments or activities outside their country of residence will comply with applicable local law and LP policies and will conduct themselves professionally and respectfully, taking account of local customs and cultural contexts to the extent consistent with applicable law, human rights and LP's values. LP Associates will not use an LP assignment to undertake unauthorized activities that create a conflict of interest or otherwise expose LP to legal, financial or reputational risk.
5. LP Associates will not directly or indirectly offer, promise, authorize, give, request or accept any bribe, kickback, facilitation payment, improper advantage or other thing of value for the purpose of influencing a decision, obtaining an improper advantage, securing or retaining business, or inducing a person to act improperly. This prohibition applies to dealings with government officials, political parties and candidates, private-sector organizations, partners, suppliers, beneficiaries and any other person or entity. LP Associates will not use third parties, intermediaries, contractors, agents, partners or other persons to make a payment or provide a benefit that LP or the LP Associate would be prohibited from making or providing directly. Facilitation payments are prohibited except where payment is necessary to avoid an imminent threat to health or safety and is reported promptly to LP.

6. LP Associates will not accept or provide gifts, hospitality, travel, entertainment, discounts, services, employment opportunities or other benefits where doing so could reasonably be expected to influence, or appear to influence, an official decision, procurement process, grant decision, recruitment decision or other organizational activity. Modest, customary, reasonable, transparent and lawful gifts or hospitality may be accepted or provided where they are not intended to obtain an improper advantage and are consistent with LP's applicable policies. LP Associates will disclose and obtain prior approval for gifts, hospitality or other benefits that exceed applicable thresholds or may create a conflict of interest.
7. LP Associates will not use LP funds, assets, personnel or other resources to make political contributions or provide support to political parties or candidates for public office except where expressly permitted by applicable law and consistent with LP's charitable and public-benefit purposes. LP Associates remain free to participate in lawful political, civic and public-interest activities in their personal capacity, provided that they do not represent such activities as being undertaken on behalf of LP, do not use LP resources for such purposes, and do not create an actual or apparent conflict of interest with their responsibilities to LP.
8. LP Associates will not create false, misleading, incomplete or off-book records, conceal transactions, or authorize payments without appropriate documentation and approval.
9. LP Associates will safeguard LP's financial, physical, digital, intellectual and other assets and use them only for authorized purposes. LP Associates will take reasonable measures to prevent theft, loss, unauthorized use, disclosure, damage or misuse of LP resources.
10. LP Associates will perform their duties in LP's best interests and will avoid actual, potential or perceived conflicts between their personal interests and LP's interests. Conflicts may arise from financial interests, outside employment, board or advisory positions, family or close personal relationships, gifts, procurement or grant decisions, or other circumstances. LP Associates must promptly disclose relevant conflicts in accordance with LP's conflict-of-interest procedures. Directors and officers will make disclosures to the Board or another body designated by the Board.
11. LP Associates will not exploit for personal gain opportunities or information that come to their attention through their position with LP, LP activities or LP resources, unless the opportunity has been fully disclosed to LP and LP has expressly declined to pursue it. Directors and officers will disclose such opportunities to the Board.
12. LP Associates will not knowingly cause, facilitate or contribute to serious human rights abuses through their activities on behalf of LP. LP Associates will raise concerns where LP activities, partners, suppliers or other relationships may present a significant risk of contributing to serious human rights abuses.
13. LP is committed to a workplace and program environment free from unlawful discrimination, harassment, bullying, intimidation, retaliation, sexual harassment, sexual exploitation and sexual abuse. LP Associates will treat colleagues, partners, beneficiaries, applicants, contractors and other persons with dignity and respect and will not engage in conduct prohibited by applicable Dutch or EU equality and anti-discrimination laws.
14. LP Associates will not knowingly provide funds, assets, goods, services or other resources to any person or entity where doing so is prohibited by applicable EU or Dutch law or sanctions measures.

15. LP Associates will not engage in or facilitate trafficking in persons, forced or compulsory labour, slavery or servitude, or sexual exploitation or abuse. LP will not knowingly support contractors, suppliers, partners or other persons who engage in such conduct.
16. LP Associates will comply with all applicable European Union and Dutch laws and regulations concerning sanctions, restrictive measures, embargoes, export controls, import controls and other trade restrictions. LP Associates will not directly or indirectly engage in, facilitate, finance or otherwise support any transaction or activity prohibited by applicable sanctions or restrictive measures. LP Associates will not knowingly provide funds, economic resources, goods or services to, or otherwise engage in prohibited dealings with, persons, entities, organizations, sectors or countries subject to applicable sanctions or restrictive measures, except where expressly permitted or authorized under applicable law.
17. LP is committed to protecting children from abuse, exploitation, neglect and other harm. LP Associates will comply with applicable child-protection laws and LP safeguarding policies; consider child-safeguarding risks in planning and implementing activities; maintain appropriate professional boundaries with children; not engage in or facilitate child abuse, exploitation or neglect; comply with applicable requirements concerning images and personal data of children; and promptly report safeguarding concerns.
18. LP Associates will protect confidential, proprietary and personal information obtained through their work for LP in accordance with the EU General Data Protection Regulation (GDPR) and applicable Dutch legislation, and LP's policies. LP Associates will use LP information systems and data only for authorized purposes and promptly report suspected data breaches or other information-security incidents in accordance with LP procedures.
19. LP Associates involved in procurement, contracting, grants or selection processes will conduct such activities fairly, transparently and objectively and in accordance with applicable law, donor requirements and LP policies. LP Associates will not manipulate procurement processes, improperly disclose confidential bid information, favor suppliers or partners because of personal relationships, or accept benefits that could influence procurement or contracting decisions.
20. LP Associates are expected to promptly report suspected violations of this Code, applicable law, fraud, corruption, safeguarding concerns, conflicts of interest, misuse of LP resources, serious misconduct or other concerns through LP's established reporting channels. Reports may be made in good faith without fear of retaliation. LP will not tolerate retaliation against a person who, in good faith, raises a concern, makes a report, participates in an investigation or otherwise exercises a right protected by applicable law.
21. LP Associates will not instruct, authorize, assist or permit any person acting on behalf of LP to engage in conduct that would violate this Code or applicable law. Managers and supervisors have an additional responsibility to promote compliance, respond appropriately to concerns and ensure that personnel understand the standards applicable to their work.