# LEO Foundation Code of Conduct



The LEO Foundation Code of Conduct is a set of guiding principles for desired ethical behavior. It reflects our values of integrity, dedication and ambition and clarifies the standards by which LEO Foundation affiliated persons are expected to behave and act.

# Who is subject to the code?

The LEO Foundation Code of Conduct is addressed towards employees of the LEO Foundation and LEO Holding (collectively the "Foundation"), as well as the Foundation's non-executive board members, external committee members, suppliers, grantees and personnel funded by Foundation grants (collectively "LEO Foundation affiliated persons").



# **Principles of the Code of Conduct**

### 1. Human and labor rights

The Foundation supports and respects the protection of internationally proclaimed human and labor rights. LEO Foundation affiliated persons shall make sure that they are not complicit in human rights abuses and shall comply with applicable laws and regulations, as well as any applicable collective agreements of relevant institution(s)/organization(s).

The Foundation does not in any way support the use of child labor, and LEO Foundation affiliated persons shall uphold effective abolition of child labor.

LEO Foundation affiliated persons shall uphold the elimination of all forms of forced and compulsory labor, ensure fair and reasonable remuneration, and provide employees with adequate training to carry out their jobs safely and responsibly.

# 2. Diversity, inclusion and non-discrimination

LEO Foundation affiliated persons shall strive to promote diversity and inclusion and the right to equity in the workplace and shall refrain from any discrimination for reasons such as race, color, age, pregnancy, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership or marital status.

We expect LEO Foundation affiliated persons to prevent discrimination, harassment, harsh and inhumane treatment, including sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers and co-workers as well as threats of any such treatment.

## 3. Environment, climate and energy

LEO Foundation affiliated persons shall comply with all applicable environmental regulations and strive to operate in an environmentally responsible and efficient manner. LEO Foundation affiliated persons are encouraged to conserve natural resources, to avoid the use of hazardous materials where possible, and to engage in activities that reuse and recycle.

# 4. Anti-corruption, anti-money laundering, and anti-bribery

The Foundation does not tolerate any form of corruption, money laundering, bribery, extortion, or embezzlement, and LEO Foundation affiliated persons shall not pay or accept bribes or participate in other illegal inducements in business or government relationships, nor through the use of intermediaries. LEO Foundation affiliated persons may not give, promise or accept gifts or hospitality that could be perceived as intended to improperly influence a decision or which could unduly affect proper business judgement.

The Foundation defines corruption as the abuse of entrusted power for private gain; and bribery as offering, giving, soliciting, or accepting any gift, fee, reward, or advantage to act in a way which is dishonest, illegal, or a breach of trust.

## 5. Anti-trust, export control and sanctions

The Foundation is committed to supporting fair competition and adherence to governing export controls and sanctions, and LEO Foundation affiliated persons shall adhere to applicable anti-trust, export control and trade sanction regulations.

## 6. Standards for good research practices

All recipients of research grants from the Foundation shall comply with generally recognized standards for good research practice, including the rules of the grantee's research institution as well as applicable laws of the country in which the grant is utilized. The Foundation expects the knowledge generated from projects supported by the Foundation is shared.

## 7. Fraud and misuse of grants

The Foundation does not tolerate any form of fraud or misuse of grant funds. Grants from the Foundation shall be used strictly and solely towards the running and completion of the relevant projects in accordance with the issued grant letters and governing terms and conditions.

#### 8. Tax

The Foundation is committed to acting ethically and responsibly in our tax affairs and expect all LEO Foundation affiliated persons to ensure compliance with applicable tax laws and regulations.

#### 9. Conflicts of interest

LEO Foundation affiliated persons shall strive to avoid and manage any conflicts of interest, and shall notify all affected parties if an actual, potential, or perceived conflict of interest arises. The Foundation does not tolerate any forms of nepotism, including the preferential treatment without regard to merit of friends, family, or other close relations in terms of recruitment, procurement, grant giving, or any other business decisions.

#### 10. Data protection

LEO Foundation affiliated persons shall comply with applicable data protection and privacy laws and ensure that personal data and confidential information is stored securely, is kept accurate and organized – retained for no longer than necessary – and only used for a specific and legitimate business purpose.

# Breaches, sanctions and reporting

Breaches of the Code of Conduct may have contractual consequences and/or lead to disciplinary sanctions. For grant recipients, this may e.g., result in the Foundation reducing or terminating a grant or demanding repayment of grant funds

The LEO Foundation expects its partners and grantees to take immediate and effective action to address any breaches of the Code of Conduct.

The Foundation has set up a whistle-blower scheme, providing a safe and anonymous way of voicing any suspicions of serious misconduct or unlawful behavior within the Foundation or in connection with the Foundation's activities. The whistle-blower scheme can be accessed via the Foundation's website.

www.leo-foundation.org