

## Code of Conduct

### Understanding and applying the code

This Code of Conduct is built on KIPAY's values and, together with KIPAY's policies and procedures and applicable laws and regulations, provide a framework for what we consider responsible conduct.

The Code of Conduct reflects our commitment to applying ethical professional practices and compliance throughout our organization wherever we operate and conduct business and work on behalf of KIPAY. This Code of Conduct creates the foundation that supports our efforts to do the right things and to always act with integrity.

The Code of Conduct is designed to help you make the right decisions for yourself and for KIPAY. As a KIPAY employee, you must follow the rules of the Code of Conduct and always strive to exercise good judgment, care and consideration in everything you do for the company. If we are unsure about the meaning of any part of the Code or are confronted with an ethical dilemma, we seek advice and raise this with our manager.

The Code of Conduct applies, regardless of location, to all KIPAY employees as well as to all temporary personnel, consultants, contractors and others who act on behalf of or represent KIPAY, and to the members of the Board of Directors of KIPAY.

As a KIPAY employee, you are expected to conduct your work with integrity and transparency and to demonstrate commitment to the highest ethical standards in your dealings with colleagues, partners and other stakeholders.

### Seeking guidance, raising concerns, and reporting suspected violations

KIPAY is committed to building a culture of trust where employees are comfortable to ask questions, seek guidance, raise concerns, and report suspected violations. We all have a responsibility to speak up promptly about ethical issues and suspected violations.

### Human rights, labour rights and equal opportunities

KIPAY is committed to respecting and promoting human rights of all individuals potentially affected by our operations. We respect the fundamental principles set forth in the Universal Declaration of Human Rights and related UN documents.

KIPAY supports and respects recognized labour rights, including the freedom of association and the right to collective bargaining within national laws and regulations.

We are opposed to all forms of human trafficking and child labour abuse and shall not employ or contract any forced or compulsory labour. KIPAY will follow guidance of the International Labour Organisation (ILO) conventions including ILO 169.

KIPAY is committed to providing equal employment opportunities and treating all employees fairly and with respect.

### Legal compliance

KIPAY will comply with applicable laws and regulations in the jurisdictions in which it operates. KIPAY will respect laws in the country it runs projects and respect all customary laws. KIPAY will compete fairly across markets.

### Harassment-free workplace

KIPAY does not tolerate any form of harassment or bullying in the workplace. We all have the right to work in an environment that is free from intimidation and harassment and where we can feel safe and comfortable. We do not tolerate any form of harassment or discrimination, including but not limited to gender, race, colour, religion, political views, union affiliation, ethnic background, disability, sexual orientation or marital status. We do not tolerate any form of physical punishment.

### Health, safety, security and environment

We value human life above all other considerations and will not compromise our safety. We are committed to providing a safe workplace for our employees, contractors and visitors. We believe that all injuries, occupational ill

-health and environment incidents can be avoided.

KIPAY is committed to safeguarding its employees, business and assets against harm from intentional acts through a culture characterized by broad support of our employees, continuous learning and improvement.

### Committed to climate adaptation and minimizing measures

KIPAY will aim in its projects, where possible, to introduce and internationally and nationally accepted measures to reduce climate change impacts.

### Committed to contributing to Sustainable Development Goals (SDG)

KIPAY will aim to contribute to SDG in its projects through direct project related activities and/or indirectly through project activities orchestrated those of its partners.

### Anti-corruption and anti-bribery

KIPAY does not tolerate corruption in the private or the public sector. We are committed to complying with all applicable laws and regulations enacted to fight corruption and bribery.

### Money laundering

We do not take part in any form of money laundering and ensure that financial transactions in which KIPAY is a part are not used to launder money.

### Political contributions and activities

KIPAY does not sponsor political parties or politicians. KIPAY may participate in public debate when in the company's interest. All those who work for, act on behalf of, or represent KIPAY are free to participate in democratic political activities, but this must be without reference to or connection with their relationship to KIPAY.

### External communication

KIPAY's profile is greatly influenced by our ability to communicate consistently and professionally with external parties, including the media. Consequently, KIPAY shall maintain a principle of honesty and be responsive when dealing with interested parties outside KIPAY and society at large.

To secure a consistent company profile, all those who work for KIPAY shall consult with KIPAY's direction and be authorized to speak to the media on behalf of KIPAY.

### Conflict of interest

A conflict of interest exists whenever you have a competing personal interest that may interfere with your ability to make an objective decision and act in the best interest of KIPAY. You shall not seek to obtain an improper advantage – directly or indirectly - for yourself, your family, relatives or friends.

### Use of company property and assets

It is the responsibility of all KIPAY employees and other representatives of the company to safeguard the assets, property and records of KIPAY and its customers, suppliers and other business partners. Tangible assets include physical facilities and equipment, computer systems, PCs, mobile phones, files and documents, inventory, supplies and real estate. Intangible assets include intellectual property, know how, confidential information, reputation and goodwill. It is everyone's responsibility to use KIPAY's assets with care. We are all responsible for using good judgment to ensure that KIPAY's assets are properly managed and protected and not stolen, misused or wasted.

### Substance abuse and other personal conduct

KIPAY is a drug-free workplace. Accordingly, you may not be under the influence of intoxicating substances, including alcohol, while at work for KIPAY. KIPAY strictly prohibits the purchase of sexual services when on assignment or on a business trip, irrespective of whether permitted by local law, or not.

### Confidentiality

We are committed to safeguard and not to misuse any confidential information in our possession, regardless if it is information belonging to KIPAY or to our partners and stakeholders. Confidential information may also include intellectual property, information concerning individuals, commercial conditions, technical or contractual matters and other types of information protected by law.

Be aware that your duty of confidentiality continues after your employment or other contractual relationship with KIPAY has ended.