



Code of Conduct

OUR CODE

The Micronutrient Forum (MNF) is committed to employing best practices as we conduct our work and our Code of Conduct provides the framework to help us keep this commitment.

This Code of Conduct applies to all employees, consultants, interns, volunteers, and the Board of Directors. This policy also applies to all MNF collaborators such as vendors or technical partners of the MNF. Each must acknowledge by signing the attestation that they have read and will comply with the Code of Conduct.

Vendors and technical partners can adopt their own policies and procedures that are consistent with the goals and objectives of the Micronutrient Forum's Code of Conduct. Such policies must include provisions for the prevention of sexual exploitation and abuse.

Although it's virtually impossible to spell out the right approach for every situation, the following points sum up the spirit and intent of our Code:

- obey the laws wherever we are;
- avoid all conflicts of interest;
- foster a collaborative, harassment-free workplace; and
- build a culture where we exemplify integrity in everything we do.

By applying common sense, good judgment and these core principles we can handle any situation with ethics and integrity.

BUSINESS CONDUCT

COMPLIANCE WITH APPLICABLE LAWS

You should never take any action that you know or suspect would violate any applicable law or regulation. Likewise, we should never direct, encourage or assist anyone to violate the laws of any country. This is true even where conduct is legal in some countries if it is illegal in the country in question. If you have any question about the legality of any action, please ask someone on the Governance Committee for help.

A few areas of the law are worth specific mention because, as an organization with global reach, these areas inherently present special risks to us.

Foreign Tax and Currency Laws. We must follow both foreign and domestic tax laws and foreign currency exchange control laws. You may not enter into any transaction with agents, contractors, consultants, lawyers, distributors or other persons that you know, or suspect would circumvent these laws. Any transaction that could have the appearance of permitting someone to circumvent these laws must receive the prior approval of the Executive Committee.

Labor and Human Rights Laws. We must strictly comply with all local human rights laws for all countries in which we or our suppliers do business. As a global policy we prohibit the use of forced labor, child labor and unsafe working conditions in any of our operations.

Anti-Corruption Laws. We are subject to anti-bribery and anti-corruption laws wherever we operate. You are expected to abide by such laws at all times and our position is clear:

The Micronutrient Forum does not tolerate corruption in any form. Neither the



Code of Conduct

Micronutrient Forum nor anyone working for or on our behalf of us may give or receive any bribe, kickback or other corrupt incentive.

If you are asked explicitly or implicitly to give, receive or otherwise facilitate a bribe, you should immediately report it to the Governance Committee for further action. Never take anything of value or agree to do so in any situation that could even have the appearance of such an arrangement.

FAIR DEALING

We are subject to laws that prohibit the theft or misuse of proprietary information. You should never attempt to acquire such information through improper means. This includes inducing past or present employees of other organizations to divulge such information. Likewise, you should never use improperly obtained information. If you have any questions about the legality of proposed information gathering, please contact the Governance Committee.

Employees involved in procurement have a special responsibility to adhere to principles of fair competition in the engagement of others or the purchase of goods and services by selecting suppliers based exclusively on normal commercially reasonable considerations, such as quality, cost, availability, and reputation, and not on the receipt of special favors, kickbacks or other incentives.

CONFLICTS OF INTEREST

You should avoid all conflicts between your personal interests and the interests of Micronutrient Forum. Meaning, any situation where you are—or could even appear to be—subject to influences, interests or relationships that conflict with the Micronutrient Forum’s best interests should be avoided. It’s not possible to anticipate every conflict situation in practice and it may not be clear whether or not a conflict of interest may exist. Your safest course is to fully disclose the potential conflict and get guidance from the MNF Governance Committee. In any event, you may not proceed in the face of an actual or potential conflict of interest without a waiver from the Executive Committee.

ABUSE, EXPLOITATION AND HARASSMENT FREE WORKPLACE

We each are responsible for protecting and enhancing our collaborative environment. Actions that can harm this environment are inappropriate in any job and some are outright illegal. A few merit special mention below:

Protection from sexual exploitation and abuse (PSEA). We are obliged to protect vulnerable persons from sexual exploitation and abuse by our own employees and associated personnel.

Sexual Abuse. Any sexual assault or threat of sexual assault committed with fore coercion, or in the course of an unequal relationship. Any sexual activity with a child is considered to be sexual abuse.

Sexual exploitation. Any actual or attempted abuse of a position of vulnerability, differential power, or trust, for sexual purposes, including, but not limited to, profiting monetarily, socially or politically.

Child Protection: We are obliged to protect individuals below 18 years of age (“Minors”) from all types of abuse and maintain an environment that prevents such conduct occurring during the course of MNF’s activities. Abuse includes all physical and mental abuse, violence, offensive behavior, sexual activity, neglect and sexual exploitation. MNF representatives are prohibited from engaging in sexual activity of any kind with Minors or anyone below the local age of consent. Mistaken belief of age will not be a defense.

Other Harassment. We also prohibit any conduct that creates an intimidating, hostile or offensive work environment. You should never make any physical threat or engage in any verbal abuse toward other employees whether at work or on social media.

Non-Discrimination. The MNF treats each employee fairly and with respect and provides equal employment



Code of Conduct

opportunities without regard to any distinctions based on race, color, ancestry, place of origin, religion, marital status, family status, physical or mental disability or gender or sexual orientation, in accordance with the law. You must avoid any actions in your job that would undermine MNF's policy against discrimination.

CULTURE OF INTEGRITY

TRUE AND ACCURATE COMMUNICATIONS AND RECORDS

We should always be truthful in communications with each other, our customers, internal and external auditors, government agencies and other third parties. No employee should ever conceal any business or financial information from our internal or external auditors.

We also must maintain business records that accurately and fairly reflect our business and financial transactions. No employee should ever falsify or forge any such records.

We all have a duty to make sure that MNF at all times provides full, fair, accurate, timely, and understandable disclosure in reports and documents that it files with, or submits to, the tax or other regulatory authorities. Employees may be called upon to provide information to assure that MNF's public reports are full, fair, accurate, timely and understandable. Each of us is expected to take this responsibility very seriously and to provide prompt and accurate answers to internal inquiries related to our financial statements and any other disclosure requirements.

CONSEQUENCES AND DUTY TO REPORT VIOLATIONS

Violation of our Code of Conduct may result in discipline, including termination of employment or referral to authorities for prosecution if the conduct is criminal. Third parties who violate our Code may face termination of their business with MNF as well as claims for breach of contract.

We all have a joint reputation to protect. It's simply not enough to do the right thing on your own while ignoring violations by others. Failure to report violations not only works against our culture of integrity it may also be seen as aiding the wrongful acts of others.

ACCOUNTABILITY PROCESS

When an individual wishes to make a complaint or provide feedback related to the Code of Conduct of the Micronutrient Forum but does not wish to approach the management team to do so, an individual has the option of sending an email to notify@micronutrientforum.org.

This email account is administered through the Chair of the Governance Committee of the Board of Directors and handled confidentially so that the complaint or feedback can be investigated and responded to appropriately.

Complaints will be investigated promptly as outlined in MNF's Complaint Investigation Procedure.

Roles and Responsibilities

All MNF representatives are expected to:

- Comply with this and all MNF policies, procedures, and guidelines
- Declare potential conflicts of interest at the earliest opportunity
- Be alert for situations that violate this Code and report concerns to their supervisor or send an email to notify@micronutrientforum.org

Code of Conduct

- Assist and support investigations by providing all requested and relevant information

MNF leadership is responsible for:

- Identifying risks and performing risk assessments
- Developing and maintaining effective procedures and controls specific to their area of responsibility, including delegation of roles and responsibilities
- Ensuring that controls are implemented, and procedures are followed
- Ensuring that their staff are aware of and have been trained on this policy

Disciplinary Actions

Anyone who has been found to have violated any part of this Code of Conduct may be subject to the following disciplinary actions based upon the severity of the violation:

- Verbal or written warning
- Negative performance evaluation
- Suspension
- Dismissal (Immediate termination of employment)
- Legal action



Code of Conduct

Acknowledgement:

I have read carefully and understand the Micronutrient Forum Code of Conduct and hereby agree to abide by its requirements and commit to upholding the standards of conduct required to support the Mission, Charter and Values of the Micronutrient Forum.

Acknowledged By:

Name:

Signature:

Date:

Location:
