



CODE OF ETHICS

LIFE is committed to integrity as the fundamental guiding principle for members of the Board of Directors (the “**Board**”), its committee members and its staff. The Board has adopted this Code of Ethics policy (this “**Code**”) to specify certain rules and policies applicable to the maintenance of this commitment. All staff, committee and Board members are expected to comply with the letter and spirit of this Code.

While no Code can anticipate every situation that may arise, this Code is designed to remind Board and committee members and staff of their general ethical requirements so that LIFE’s activities are conducted in accordance with the highest standards of integrity. Staff, committee and Board members are expected to conduct themselves accordingly and seek to avoid even the appearance of improper behaviour. LIFE may establish additional principles, rules or policies from time to time.

While not required to sign an annual statement, copies of this Code should be provided to all those assisting or acting on behalf of LIFE who are not Board members, committee members or staff.

This Code is supplemental to and should be read in conjunction with the Code of Conduct, which applies to Board members.

Guiding Principles

1. All members of the Board of Directors, committee members and staff should have a continuing interest in furthering the work of LIFE.
2. All members of the Board of Directors, committee members and staff should uphold the following ethical principles:
 - (a) **Integrity:** all those subject to this Code should behave with integrity; being honest, truthful and trustworthy. All those subject to this Code owe a duty to advance LIFE’s interests and should not use LIFE’s property or information for personal gain. All those subject to this Code should obey all applicable laws and regulations. Any suspicion of illegal or unethical behavior should be notified to the Board, relevant committee or staff line manager, as appropriate. LIFE does not permit retaliation for reports of possible misconduct made in good faith.
 - (b) **Professional conduct:** all those subject to this Code should adopt a professional approach and conduct themselves with courtesy and consideration towards all with whom they come in contact. All those subject to this Code shall deal fairly and honestly with those who are affected by their actions and shall treat others as they would expect to be treated. No member of the Board of Directors, committees or staff shall seek to take unfair advantage through manipulation, concealment and abuse of privileged information or misrepresentation of material fact.
 - (c) **Confidentiality:** all those subject to this Code should keep private all information that is confidential to LIFE. Confidential information includes all non-public information that might

be harmful to LIFE or any of its projects, if disclosed, as well as deliberations of the Board or committees.

- (d) **Competence:** all those subject to this Code should make every reasonable effort to ensure that LIFE's assets are used responsibly.
- (e) **Non-discrimination:** all those subject to this Code should seek to reward and recognise accomplishments without regard to race, gender, sexual orientation or religion. LIFE shall promote relationships based on mutual trust and respect and shall provide an environment in which individuals may question a practice without fear or adverse consequences.
- (f) **Declaring Conflicts of Interest:** all those subject to this Code should seek to avoid potential conflicts of interest (including any solicitation of any business from the Lebanese government that may be or may be perceived as a conflict with aspects of the "Promote" agenda of LIFE) in their personal and professional relationships. Any potential or actual conflicts of interest should be immediately notified to the Board, relevant committee or staff line manager, as appropriate.

- 3. LIFE will take reasonable steps to prevent it, or any person acting on its behalf from: accepting or offering any inducements. In this respect, all those subject to this Code may not accept gifts, meals, honoraria, business contracts or entertainment from persons or organisations where such gift, meal, honorarium, business contract or entertainment is offered in order to influence LIFE's work, or where the acceptance of such gifts, meals, honoraria, business contracts or entertainment could create the appearance of such influence. All those subject to the Code shall not accept any gift(s), including meals, in excess of £100 aggregated per year from persons doing business with LIFE or from persons applying for grants from LIFE, unless explicitly pre-approved by the Board.

Annual Statements

- 4. Each member of the Board, committee or staff shall annually sign a statement, which affirms such person:
 - (a) has received a copy of this Code;
 - (b) has read and understands the Code; and
 - (c) has agreed to comply with the Code.

Violations of the Code

- 5. If the Governance Committee or the Board has reasonable cause to believe any person subject to this Code has breached the Code or failed to disclose actual or potential conflicts of interest, it shall inform the staff or committee or Board member of the basis for such belief and afford the staff or committee or Board member an opportunity to explain the alleged breach or failure to disclose.
- 6. If, after hearing the staff or committee or Board member's response and after making further investigation as warranted by the circumstances, the Governance Committee or the Board determines the staff or committee or Board member has breached the Code or failed to disclose an actual or possible conflict of interest, the Board shall determine appropriate actions to be taken. Such actions shall be reasonably designed to deter wrongdoing and to promote accountability for adherence to the Code. In determining what action is appropriate in a particular case, the Board shall take into account all relevant information, including the nature and severity of the violation, whether the violation appears to have been intentional or inadvertent or whether the individual should have known that the conduct was a violation, and whether the individual in question had been advised prior to the violation as to the proper course of action.



CODE OF ETHICS – ANNUAL STATEMENT

I, the undersigned,

1. have received a copy of LIFE's Code of Ethics;
2. have read and understand the policy; and
3. have agreed to comply with the policy.

Date

Signature