Organisation Name	**Grand Organisation Ltd**
Policy Title:	**Code of Conduct**
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Review Cycle:	**Annually**

Policy Approval and Sign-Off

Name	Title	Signature	Date
John Paul	Policy Owner	J.P	31/01/2025
Jane Kamau	CEO	J.K	31/01/2025

This policy is subject to change in accordance with new legislation and supersedes any earlier dated policy, procedure, agreement, or arrangement.

1. Policy Statement

Grand Organisation Ltd aims to operate to the highest standards with integrity, accountability, and transparency. Our Code of Conduct ensures that all staff and leadership are clear about the standards of behavior and performance required and about our zero-tolerance approach to harassment, bullying, and abuse of any kind.

The Code of Conduct also aims to improve the working environment, encourage staff retention, protect staff, and those we work with, from harm, safeguard Grand Organisation Ltd's reputation, and ensure the smooth day-to-day running of the organization. The Code of Conduct provides a set of minimum standards which form part of our commitment and responsibility to the welfare and personal security of everyone. Alongside our Health and Safety policies, it aims to protect staff and stakeholders from potential risks at work.

Grand Organisation Ltd staff and leadership, personally and collectively, are responsible for upholding and promoting the highest standards of ethical and professional conduct. Therefore, everyone related to Grand Organisation Ltd should at all times and in all circumstances, during and outside working hours, refrain from acts of misconduct and respect Grand Organisation Ltd's standards and the dignity of those with whom they have contact.

2. Scope and Purpose

This Code of Conduct applies to all staff, board of directors, volunteers, consultants, interns, and any other individuals working for or representing Grand Organisation Ltd.

The Code of Conduct establishes, at a minimum, the obligation of everyone not to exploit, abuse, or otherwise discriminate against people, and it is signed by everyone related to Grand Organisation Ltd.

3. Legal and Regulatory Framework

This policy is guided by and aligns with all relevant national and local labor laws and regulations concerning workplace conduct, safety, and employee rights.

4. Key Definitions

- **"Harassment"** – Any unwelcome conduct that creates an intimidating, hostile, or offensive environment.

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- **"Misconduct"** – Any action that violates legal or organizational rules or ethical expectations.
- **"Conflict of Interest"** – A situation where personal interest interferes with professional duties.
- **"Whistle-blower"** – Any person who reports suspected wrongdoing in good faith.

5. Individual and Collective Responsibilities

5.1. Responsibilities to Grand Organisation Ltd

You are expected to:

- Perform to a satisfactory standard the duties and responsibilities of your role as outlined in your contract and job description, and ensure that all policies and procedures relating to your area of responsibility are adhered to.
- Be appropriately dressed for the office or for an external event and maintain a clean and tidy appearance.
- Carry out any reasonable instructions given to you in relation to the performance of your role by an appropriate manager.
- Have appropriate authority to act or commit Grand Organisation Ltd in what you write, say, or email to others.
- Attend work in a fit and capable state to work and not be "under the influence of" alcohol or any illegal substance.
- Declare any potential or actual conflict of interest or bias, including but not limited to, current or former relationships with clients, suppliers, or competitors.

5.2. Responsibilities towards Colleagues and Partners

You are expected to:

- Support and encourage colleagues in achieving organizational standards and targets.
- Maintain open and professional relationships with each other.
- Value and welcome diversity in gender, culture, and background.
- Take an active part in work-related meetings.
- Listen to others respectfully and actively and deal with disagreements professionally.
- Not engage in bullying or harassing behavior towards any colleagues.
- Contribute towards the creation and maintenance of a work environment that is free from any form of exploitation or fraud.

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5.3. Responsibilities towards our Clients and Stakeholders

You are expected to:

- Respect and uphold people's dignity and rights.
- Report any suspected cases of exploitation or abuse by staff, leadership, or third-party partners.
- Respect the culture and relationships of the communities in which we operate.
- Actively avoid unintended negative consequences of our work on clients and stakeholders.

6. Integrity and Commitment

The work and reputation of Grand Organisation Ltd depend on the performance and behavior of its staff and leadership. You are therefore expected to:

- Conduct all duties with integrity and strive towards attaining a high standard of professional responsibility and achievement.
- Optimize the use of resources.
- Minimize any negative impact on the environment.
- Recognize the richness of a diverse workplace and value the unique skills and perspectives of every individual, including those of different cultural and educational backgrounds.
- Contribute to removing barriers to equality and ensure that Grand Organisation Ltd's activities take this dimension into account.
- Positively represent Grand Organisation Ltd in all situations.

7. Workplace Issues

Grand Organisation Ltd has a number of policies that address workplace conduct which ensure a professional and safe workplace for everyone. A brief overview of the relevant issues is as follows:

7.1. Bullying and Harassment

Grand Organisation Ltd believes that all staff are entitled to work in an environment free from intimidation, discrimination, coercion, and such behaviors which may interfere with good working conditions or job opportunities. Grand Organisation Ltd will not tolerate any unwelcome comment or behavior that is offensive, demeaning, humiliating, derogatory, or any other inappropriate behavior that fails to respect the dignity of an individual. To that end, Grand Organisation Ltd has a Preventing of Bullying and Harassment Policy and will take all actions necessary for its implementation and enforcement, including disciplinary action.

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7.2. A Drug-Free Workplace

The manufacture, sale, distribution, possession, or use of unlawful controlled substances, including the abuse of medication and alcohol on Grand Organisation Ltd premises and on company business is strictly prohibited and are grounds for disciplinary action and possible legal action. Alcohol is not to be consumed during work hours.

All staff are expected to:

- Not be under the influence of illegal, non-prescribed drugs, or alcohol while on Grand Organisation Ltd business.
- If attending conferences and evening events and representing Grand Organisation Ltd, to remain professional and network, represent, or liaise during the whole of the event.
- Not possess non-prescribed or illegal drugs at work. If they are found to be in possession, Grand Organisation Ltd reserves the right to formally report them to the police.
- Report immediately to the individual's line manager or the Executive Director any staff found or suspected to be under the influence of non-prescribed or illegal drugs, or is drunk at work.

7.3. A Smoke and Tobacco Free Workplace

Smoking and the use of any tobacco product is prohibited in all Grand Organisation Ltd owned, leased, or controlled facilities.

7.4. Workplace Violence

Grand Organisation Ltd does not tolerate any acts or threats of violence committed by or against its staff, partners, or visitors on its premises at any time or while engaged in business with, or on behalf of Grand Organisation Ltd, whether on or off Grand Organisation Ltd premises. Staff are strictly prohibited from carrying any firearms or other weapons while on any Grand Organisation Ltd premises or work site. Such acts are subject to disciplinary action.

7.5. Information Technology Resources

Grand Organisation Ltd's information technology resources (including computer systems, cell phones, telephones, facsimile, and other technology devices) are designed and intended for official business purposes only. All systems and data stored or conveyed on these systems are considered proprietary – they belong to Grand Organisation Ltd. Incidental personal use of these resources is permitted but must be kept to a minimum and must be appropriate. Inappropriate prohibited use includes pornographic materials, hacking, pirating of software,

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sending non-work-related chain letters, advertisements, personal or commercial solicitations, or mass mailings.

Unauthorized installation and copying or use of software programs on Grand Organisation Ltd's computer equipment is not permitted. The use of Grand Organisation Ltd information technology resources in ways that interfere with or disrupt network users, services, or equipment or otherwise constitutes abuse of privileged use is strictly prohibited. Such acts are subject to disciplinary action.

7.6. Professional Boundaries and Conduct

All staff, leadership, and contractors must maintain professional boundaries in their interactions with all individuals and stakeholders. We will take all appropriate measures to prevent any form of exploitation or abuse by its staff, leadership, and partners. For these purposes and regardless of local laws or the lack of such laws, everyone shall:

- Never engage in any sexual activity with a person under the age of 18, regardless of the age of consent locally.
- Know that the exchange of money, employment, goods, or services for sex, including sexual favors or other forms of humiliating, degrading, or exploitative behavior is prohibited.
- Where staff or leadership have concerns or suspicions regarding misconduct by a colleague or anyone else with whom they are working, they must report such concerns through the Whistleblowing Policy. Any allegation regarding misconduct will be investigated and if substantiated, will result in disciplinary action.

8. Misconduct

All Grand Organisation Ltd staff and leadership must refrain from any act of misconduct. The sections below set out the general categories of prohibited acts and include examples of specific acts which Grand Organisation Ltd considers as misconduct or gross misconduct depending on the severity of the act. Generally, any act of "abuse of power" will be considered gross misconduct.

Grand Organisation Ltd expects all staff and leadership to abide by national and international laws. Staff have a responsibility to bring any concerns to the immediate attention of Grand Organisation Ltd through the Whistleblowing Policy.

8.1. Abuse of Power

Abuse of power is defined as "The abuse or misuse of position or influence or failure to use proper discretion for personal benefit or to benefit another person. Abuse of power includes

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but is not limited to: favoritism, nepotism, cronyism, corruption, bribery, and all forms of exploitation."

Acts that will be considered abuse of power, and subject to disciplinary action, include:

- Any act which could be considered harassment, bullying, discriminatory, racism, or an illegitimate use of authority.
- Use of a position to commit Grand Organisation Ltd legally, financially, or morally without authorization.
- Stealing or misappropriation of funds, property, or human resources from Grand Organisation Ltd.
- All forms of exploitation and abuse.

8.2. Fraud and Corruption

Grand Organisation Ltd is committed to promoting and maintaining the highest level of ethical standards in relation to all of its business activities. Its reputation for maintaining lawful business practices is of paramount importance.

We have a zero-tolerance policy towards fraud and corruption, recognizing that fraud is contrary to fundamental values of integrity, transparency, and accountability, and undermines organizational effectiveness. Disciplinary action will be taken against such acts.

Negligent treatment of Grand Organisation Ltd's property and theft of any kind is a serious disciplinary issue.

Grand Organisation Ltd staff and leadership must never take advantage of their position when working with clients, suppliers, or other stakeholders.

8.3. Conflict of Interest and Gifts

The rules in relation to Conflicts of Interest and gifts are:

- Business interests, directorships, board memberships, and other employment or voluntary work must not conflict with Grand Organisation Ltd's interests. Grand Organisation Ltd reserves the right to call for the staff member’s resignation of any outside offices or employment if it believes that continuation of employment is against the best interests of the company.
- When offered a gift in relation to work carried out on behalf of Grand Organisation Ltd, staff must abide by the Receipt of Gifts Policy and Procedure.
- Corrupt business practices are prohibited, including failure to disclose or show full transparency of any potential conflict of interest with a client, partner, or any service provider.

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- To avoid conflicts of interest, staff and leadership should not accept any gift or favor or promise any gift or favor in connection with their work that could be construed as being inappropriate or an attempt to influence either your own or the recipient's judgment.
- Where a small gift such as chocolates, flowers, or modest hospitality is offered, this can be tactfully accepted.

9. Security

Grand Organisation Ltd takes the safety and security of its staff, leadership, and other stakeholders very seriously. Staff are required to follow Grand Organisation Ltd's security policies and procedures, or those of a nominated security host in a country you are visiting.

The following are considered serious breaches of security and are prohibited:

- Possessing weapons or ammunition of any kind while on duty.
- Driving a vehicle while on duty under the influence of alcohol or any illegal substance.

10. Representation

It is the responsibility of all Grand Organisation Ltd staff and leadership to ensure that publications and communications bearing Grand Organisation Ltd's name should contain material that is accurate and not detrimental to the reputation of the company.

11. Confidentiality

Staff and leadership are not permitted to disclose any confidential information acquired while carrying out duties with Grand Organisation Ltd. Such acts will be subject to disciplinary action.

12. Implementation of this Code of Conduct

All staff and leadership have a responsibility to familiarize themselves with the Code of Conduct, its purpose, and the mechanisms of reporting non-compliance with it. The Code of Conduct will be an element of induction and covered in other relevant training and briefings.

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