

1 GOGLA Code of Conduct

1.1 Introduction

GOGLA seeks to achieve bold and ambitious goals for the industry that it serves. To succeed in these goals, it is imperative that all stakeholders, working for or with GOGLA, observe high standards of business and personal ethics when conducting their duties and responsibilities. GOGLA stakeholders must act with honesty and integrity when fulfilling their responsibilities and always comply with all applicable laws and regulations. This Code articulates the general standards of professional and ethical behavior that GOGLA upholds.

1.2 Scope

This policy applies to all GOGLA Members, Representatives, Staff and Contractors, henceforth referred to as “GOGLA Members and stakeholders”. They apply to all branches and business units of GOGLA Members worldwide.

1.3. Personal and business behavior

GOGLA Members, Representatives, Staff, and Contractors must exhibit personal behavior that reflects positively on themselves, GOGLA and its stakeholders. Good judgement in all personal and business dealings is essential to maintain GOGLA’s reputation and integrity, and that of the industry. Honesty, transparency, and accountability when conducting business is required. Everyone must be treated with respect and dignity. Inappropriate behavior will result in disciplinary action up to and including termination for cause.

GOGLA does not tolerate any form of sexual harassment, discrimination, sexism, intimidation, exploitation, or abuse. Any report of this type of behavior will be taken seriously and will be investigated and handled based on GOGLA’s Safeguarding & Sexual Harassment Policy and will be sanctioned as appropriate.

To ensure a safe working environment it is essential that all GOGLA Members, Representatives, Staff, and Contractors must:

- Comply strictly with all health and safety laws and internal procedures;
- Not engage in illegal or dangerous activities or behavior, such as threats or violence;
- Not possess, distribute or be under the influence of alcohol or drugs, while conducting GOGLA-business; and
- Not carry, distribute or use weapons or firearms of any type while conducting GOGLA business.

Conflicts of Interest, that can affect the ability to perform duties or act objectively and effectively and in the best interests of GOGLA or the industry, must be avoided. GOGLA's interest in any business matter must be placed ahead of any personal interest. Should a Conflict of Interest arise, these should be reported to the GOGLA Board of Directors or Executive Team. GOGLA Representatives, Staff and Contractors shall follow the GOGLA Conflict of Interest Mitigation Policy.

1.4. Compliance with applicable laws, rules, regulation and policies

Knowledge of, and compliance with, the current local laws, rules, regulations and policies applicable to carrying out GOGLA activities is required. In the event a local law, rule or regulation conflicts with this Code, the most stringent will apply. It is strictly prohibited to manifest any behavior or undertake

any form of action that goes against this Code and other GOGLA policies, including GOGLA's *Anti-Bribery and Corruption*, *Anti-Terrorism Financing* and *Anti-Money Laundering* policy.

Furthermore, it is required to be familiar with and respect local culture, structures, beliefs, and customs, as long as these are compliant with international and humanitarian laws and norms and GOGLA policies.

1.5 Avoidance of anti-competitive behavior

- Members should not exchange information that could undermine competition.
- Information to be exchanged shall be limited to the implementation of the GOGLA policies.
- Any sensitive information shall be provided, if necessary, only to an independent third party.
- Every official meeting between GOGLA Members shall have a specific, demonstrable purpose.
- Any other kind of contact between GOGLA Members shall be for legitimate purposes only.

1.6 Protection of assets, resources and data

GOGLA assets, resources and data are to be used for business purposes only and personal use is prohibited. They must be protected against loss, damage, theft, misuse or waste.

Confidential data in GOGLA's possession – whether about GOGLA or external parties – must be protected at all times and must be handled in accordance with GOGLA's *Data and Privacy*, GOGLA's Policy Personal Data Policy and Confidentiality Agreements. Confidential information includes, but is not limited to, members' data, contracts, employees' information, website data, records and other documents in GOGLA's possession, in both hard and soft copy. These are to be destroyed or delivered to GOGLA promptly after the relationship with GOGLA ends or at any time upon GOGLA's request. The obligation to protect this information continues after the relationship with GOGLA ends. Preserving the integrity of this information is vital to GOGLA's business and reputation. It is therefore important to be discrete when discussing GOGLA's business, including in public places or when using phones or email outside the office. Confidential information can only be discussed with authorized GOGLA individuals and documents containing such information should not be left unattended, e.g., in conference rooms or in public places.

GOGLA strives to meet all obligations under data protection laws. All personal data held by or on behalf of GOGLA shall be protected. Personal data includes, but is not limited to, sensitive personal, medical, and financial information. Personal data will only be held by GOGLA for as long as there is a lawful basis for retaining it. All reasonable steps to ensure that personal data is kept confidential and is accessed only by individuals that require this information to carry out their duties must be taken. Third Parties must comply with GOGLA's data protection and privacy policies when personal data is shared with them.

1.7 Communications and media

Access to GOGLA's communication channels, including internet and email, is meant for work related usage only. Personal usage of internet, email, telephone, and all other forms of communication by GOGLA Staff Representatives might be acceptable in certain circumstances provided this is managed appropriately. It is not allowed to visit websites, download material, or send any emails with pornographic, discriminatory, (sexually) intimidating, violent or criminal content. It is prohibited to send any business and/or confidential information to a personal email account or maintain a copy of said information on a personal computers or other non-work electronic devices.

It is prohibited to discuss information about GOGLA, its members, funders & partners, employees, and other business matters on personal social media account platforms, unless an explicit permission has

been granted. In addition, only authorized employees can speak on behalf of GOGLA, including to the media, unless an explicit permission has been granted.

1.8 Reporting a breach

GOGLA Employees, Representatives, Members, Partners, Third Parties and any other individual and/or organization associated with GOGLA have the duty to report any suspected or actual breach of the Code. Any suspicion of misconduct can be reported to the Executive Director or any member of the Board of Directors. A report should include information about (i) the name(s) of the individual(s) against whom the report is being made, (ii) the name of the individual making the report (iii) a description of what was seen and/or said, (iv) the date and location of the event and (v) the names of any witnesses to the event. Witnesses must be informed by the report writer of their inclusion in the report. There will be no retribution or retaliation for a report made in good faith.

Reporting can also be done anonymously [mechanism and process to be defined].

1.9 Consequences of a breach

Any violation of the terms in this Code by GOGLA Employees, Representatives, Members, Partners and Third Parties may be subject to disciplinary action, and in extreme cases to immediate termination of employment/contract and/or a claim for payment of a damage. The same applies to Employees, Representatives, Members, Partners and Third Parties knowing about any past or potential violations and failing to report those, and/or knowingly deceiving and/or obstructing investigations.

The GOGLA Board of Directors shall review any reports of member "non-observance" or failure to observe this Code and other GOGLA policies and rules, and, when appropriate, shall impose proportionate sanctions to be decided by a majority vote of all Board members. Disputes of a commercial or legal nature are outside of the remit of the GOGLA Board of Directors and management and should be handled through the appropriate mechanisms (e.g., law courts).

1.10 List of definitions

Advisory Board: GOGLA's advisory board.

Board of Directors: GOGLA's Board of Directors.

Conflict of interest: a person's private interest interferes – or appears to interfere – with the interests of GOGLA or one of its stakeholders.

Executive Team: GOGLA's Executive Director and Director of Strategy.

Executive Director: GOGLA's Executive Director.

GOGLA's Assets: GOGLA's intellectual property, data, work equipment.

GOGLA Staff: a person who performs or has performed work as part of the GOGLA Team under an employment or consulting contract under civil law or public law appointment for GOGLA.

GOGLA Representatives: individuals who have been formally appointed in role in which they represent GOGLA, including members of the Board of Directors, members of the Advisory Board, Chair and Co-Chairs of GOGLA Working Groups, GOGLA Employees, Consultants and Volunteers.

Contractors: intermediaries, agents, consultants, advisors, distributors, and others acting on behalf of GOGLA, as well as anyone (other than GOGLA Staff) who performs or has performed work for GOGLA.

This policy was approved by the GOGLA Board of Directors on 26 May 2021.