

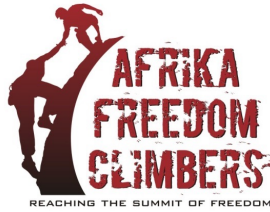
Afrika Freedom Climbers NPC

CODE OF CONDUCT

Reg. No 2013/169626/08 Non Profit Company

Address: Kgosing Section, Lesethleng Village, 0374, South Africa

History of changes		
Version number	Date	Board of Directors Approval
0.1	2 September 2020	Approved



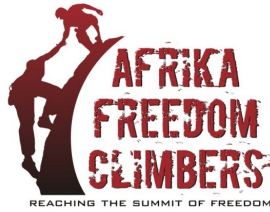
Our code of conduct

Whether it's delivering better service for our community, or earning back their trust and confidence, all of us at Afrika Freedom Climbers (AFC) are working hard to ensure that our Organisation is on a solid foundation for the future. Responsibility for ethical behaviour and professional conduct lies with all staff members at all levels, and must be taken seriously, as it forms the basis of AFC's reputation.

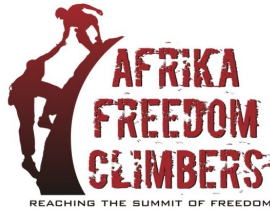
Strong performance is critical to our success, but just as important is our tactics: how we go about achieving result, with honesty and respect, without taking shortcuts, and by operating ethically and with integrity in all that we do.

To help guide and align our behaviours as we make business decisions that impact our daily operations, we rely on this Code of Conduct, which outlines our values and describes our standards for conduct, compliance, and avoiding conflicts of interest.

This document is provided for the purpose of transparency, and may include references to other internal AFC documents, which may not be publicly accessible. This document should not be reproduced.



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1. Our values

1.1. Stewardship: We leave nothing but footprints behind

We are the primary custodians of the environment and each have the responsibility to ensure its protection, conservation and sustainability while we recreate. We recreate responsibly and uphold the following seven (7) principles of leaving no trace behind:

1.1.1. Plan ahead and prepare.

When you're poorly prepared, you're more likely to run into problems. Lack of good research can lead to situations where you can become fatigued or fearful, and you may be forced to make poor choices. Planning ahead includes doing research about your destination and packing appropriately; knowing the regulations and special concerns for the area you'll visit; preparing for extreme weather, hazards and emergencies; scheduling your trip to avoid times of high use; visiting in small groups when possible; repackaging food to minimise waste; and using a map and compass to eliminate the use of marking paint, rock cairns or flagging.

1.1.2. Travel and camp on durable surfaces.

When exploring your surroundings and setting up your picnic or overnight camp, seek out resilient types of terrain. Ideal durable surfaces include established trails and campsites, rock, gravel, dry grasses or snow. Use existing trails and campsites; camp at least 200 feet from lakes and streams; keep the campsites small; and focus activity in areas where vegetation is absent. Avoid places where impacts are just beginning

1.1.3. Dispose of waste properly.

This principle applies to everything from litter to human waste to rinse water. Pack it in, pack it out. Inspect your campsite and rest areas for trash or spilled foods. Pack out all trash, leftover food and litter. Always leave a place cleaner than you found it. Deposit solid human waste in cat holes dug 20 centimetres deep; at least 60 meters from water, camp and trails; cover the cat hole when finished; and pack out toilet paper and hygiene products. To wash yourself or your dishes, carry water 60 meters away from streams or lakes and use small amounts of biodegradable soap. Scatter strained dishwater.

1.1.4. Leave what you find:

The concept of taking nothing but pictures applies here. Examine, but do not touch, cultural or historic structures and artifacts; leave rocks, plants and other natural objects as you find them; avoid introducing or transporting non-native species; clean boot soles, kayak hulls and bike tires off between trips; and do not build structures, furniture or dig trenches.

1.1.5. Minimise campfire impacts.

While campfires are a timeless camping ritual, they can also be one of the most destructive ones. Better choices include a lightweight stove for cooking and a candle lantern for light. Stargazing is an excellent alternative, and is best enjoyed when your campsite is in total darkness. Where fires are permitted, use established fire rings, fire pans or mound fires; keep fires small; use only sticks from the ground that can be broken by hand; burn all wood and coals to ash; put out campfires completely, then scatter cool ashes. Where possible, don't bring firewood from home, which could introduce new pests and diseases. Buy it from a local source or gather it responsibly where allowed.

1.1.6. Respect wildlife.

Don't approach animals. Both you and the wildlife will enjoy encounters more if you master the zoom lens on your camera and pack along a pair of binoculars. Observe wildlife from a distance and do not follow or approach them. Never feed animals as it damages their health, alters their natural behaviours,

and exposes them to predators and other dangers. Protect wildlife and your food by storing rations and trash securely. Avoid wildlife during sensitive times: mating, nesting, raising young or winter.

1.1.7. Be considerate of other visitors.

Treat others the way you would like to be treated; respect other visitors and protect the quality of their experience; be courteous; yield to other users on the trail; step to the downhill side of the trail when encountering pack stock, such as horses and mules; take breaks and camp away from trails and other visitors; let nature's sounds prevail; avoid loud voices and noises; and manage your pet or leave it at home.

1.2. Diversity: Healthy debates and differences of opinion are encouraged

We define diversity as the quality of being different or unique as an individual or group, including but not limited to age, race, religion, ethnicity, colour, physical features, gender, sexual orientation, gender expression, language differences, nationality or national origin, family or marital status, physical, mental and development abilities, socio-economic status, education, work and behavioural styles, political affiliation including different ways of thinking and ways of working. Exclusionary behaviours may include incivility, bullying and violence, discrimination and isolation of individuals and groups who are different should be avoided at all costs. Inclusive behaviours encourage diversity and can be achieved through the following:

- 1.2.1. Communicate respectfully with all colleagues, stakeholders and community members regardless of title or level.
- 1.2.2. Be mindful of remote communication, where opportunities as misunderstanding are greater. Use video communication when it makes sense; since face-to-face discussion benefits from all social cues that may be absent with other forms of communication.
- 1.2.3. Behave in a way that does not offend, intimidate, degrade, insult or humiliate others. This includes jokes, banter, ridicule or taunts.
- 1.2.4. Be generous in both giving and accepting feedback. Feedback is an important part of our culture. Good feedback is kind, respectful, clear, and constructive and focused on goals and values rather than personal preferences.
- 1.2.5. Understand and act upon the fact that what may be acceptable to one person may not be to another.
- 1.2.6. Go out of your way and across cultures to include people in casual, conversational or work-related team interactions.
- 1.2.7. Avoid slang or idioms that might not translate across cultures or be deliberate in explaining them to share our diverse cultures and languages.
- 1.2.8. Be respectful of time zones. Embrace habits that are inclusive and productive for team members wherever they are, using asynchronous communication tools (i.e. non-real time) and pay attention to time zones when scheduling meetings.
- 1.2.9. Challenge poor practice in others, helping to promote good practice and create change (e.g. don't ignore inappropriate banter, jokes, etc.)
- 1.2.10. Commit to self-improvement. If you're approached as having acted in a way that has offended another, listen with an open mind and do better.

1.3. Integrity: We are honest, ethical and fair

We define integrity as standing for honesty, openness and transparency in reporting as well as our internal and external practices. AFC is funded by a variety of sources that support our Organisational objectives and budgets require transparency. All activities utilising the Organisation's funds should be honestly reported with supporting evidence and in accordance with our Constitution and relevant pre-approved budgets. Conflicts of interest, including the appearance thereof, should be avoided.

1.3.1. Honesty

All members of the AFC family are expected to be honest and reliable, and should honour their agreements. Being affiliated with AFC should occur within an atmosphere of mutual trust and commitment. Colleagues should help and support one another.

1.3.2. Ethical conduct

We act with integrity, competence, diligence, respect and in an ethical manner with the public, clients, prospective clients, employers, employees, colleagues and all our stakeholders and place the integrity of the our organisation and mountaineering at large above our own personal interests; we use reasonable care and exercise independent judgment when conducting our activities which include: fund raising, making arrangements for expeditions, selecting guiding companies and engaging in other professional activities including research; we practice and encourage others to practice in a professional and ethical manner that will reflect credit on themselves and the mountaineering profession; and we exhibit behaviours that promote the integrity and viability of the mountaineering community for the ultimate benefit of society.

1.3.3. Fairness

We define fairness as treating people equally without favouritism or discrimination. We conduct ourselves in a professional manner and treat others with respect, fairness, and dignity, using facts to reason. Below are examples of unfair treatment of others:

- Degrading someone in front of other people (public humiliation).
- Actively undermining work and authority by destroying the good will between colleagues.
- Taking credit for work done by others.
- Not hiring, not granting fair terms and conditions or not renewing people's contracts because of their age, race, gender, religion, sexual orientation or ethnic background.
- Improper use of a position of influence, power or authority by an individual towards others. This is particularly serious when alleged offenders use their influence, power or authority to negatively influence employment conditions including, appointment, assignment, contract renewal, performance evaluation or promotion of other individuals. Abuse of authority can be a one time incident or a series of incidents that include use of intimidation, threats, blackmail or coercion.
- Personal favours that are not part of staff assignments including fetching food and beverages outside of professional events, driving personal acquaintances outside of professional requirements, running errands of a personal nature for supervisors are not permitted at AFC.
- Systematically assigning tasks to a staff member or work that is not appropriate to their grade level or repeatedly requesting action to be taken on non-urgent matters outside of regular working hours may also amount to abuse of authority.

2. Electronic communication and social media

2.1. Emails

While emails are within a secure communication network at AFC, they can be forwarded and shared with unintended recipients. Due care should be applied on all correspondence with all stakeholders: internal and external. All AFC values must be taken into consideration and applied at all times when using AFC email addresses and communicating on behalf of AFC.

You may have access to confidential proprietary non-public information on the job. You may work with information that contains personally identifiable material about AFC, employees or clients, such as their names,

addresses, phone numbers, or identify numbers. Maintain the confidentiality of information entrusted to you by AFC and our stakeholders, except when disclosure is properly authorised or legally mandated.

2.2. Social media

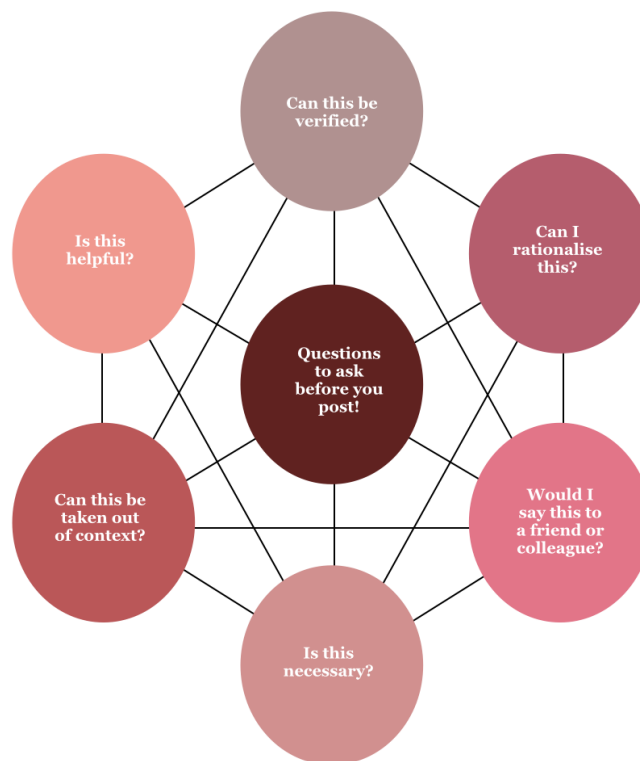
The reach of social media is now wider than ever. While social media can help AFC build and strengthen relationships with our stakeholders and community members, it also has the potential to negatively and permanently impact the public’s perception of AFC or your personal or professional reputation. Social media activity also includes permitting, or failing to remove, posts by others where the employee can control the content of posts, such as on a personal page or blog. AFC respects your right to participate in social media and understands that your time outside of work is your own. AFC also values its established brand reputation and goodwill relationships, which are important corporate assets.

Our reference to social media activity includes the following platforms:

- All types of posts and other communications on the Internet;
- Posts on social networking sites such as Facebook, Twitter, Instagram, TikTok, SnapChat, LinkedIn etc;
- Blogs and other online journals such as Tumblr and Wordpress;
- Posts of video or audio on media-sharing sites such as YouTube or Vimeo;
- WhatsApp, Messenger and similar applications that are used on smart phones; and
- Bulletin boards and chat rooms

Whether or not you consider yourself a Tweeter, Blogger or Facebooker, it is important to understand how to use social media appropriately and effectively. If you engage in social media activity that identifies you as an AFC employee, or your work at AFC, even if done off premises and while off-duty, you could affect AFC’s reputation and we recommend the 6 questions to ask regarding proposed social media posts in **Figure 1** below.

Figure 1: Questions to ask before posting on social media



We recommend these behaviours:

- Be open and honest about who you are (no false names or pseudonyms), especially if it could be reasonably construed that you're speaking on behalf of AFC.
- Recognise that your social media activity is subject to relevant AFC policies, standards, and procedures. This includes but is not limited to this Code of Conduct as well as requirements for protecting confidential information.
- Use your personal email account (not AFC email) when setting up or participating in external social media channels.
- Use your own personal device when making personal references or recommendations on social media outlets such as LinkedIn or Yelp. Personal references and recommendations on social media sites should be done as an individual and not on behalf of the company.
- Adhere to copyright and fair use laws.
- You should never state that you are speaking on behalf of AFC unless you're an authorised representative of the company.

We discourage these behaviours:

- Don't represent in any social media content that you are authorised to speak on behalf of AFC, or that AFC has reviewed and approved your content, without the prior written approval of AFC.
- Don't post content about AFC, management, coworkers, donors/investors/benefactors, club members, vendors, affiliates or competitors that is vulgar, obscene, threatening or a violation of AFC's conduct and standards including those addressing discrimination, harassment and work place violence.
- Don't make business commitments for AFC on social media platforms. Information generated on social media is considered temporary and not legally binding but can lead to repetitional damages.
- Don't post photographs or video of the non-public areas of AFC's premises, or of AFC's processes, operations or products without AFC's prior written approval.
- Don't use AFC's logo, trademark or proprietary graphics in a way that suggests that you are representing AFC.

3. Harassment

We define harassment as any improper or unwelcome conduct that might reasonably be expected or be perceived to cause offence or humiliation to another person.

3.1. General harassment

Harassment may be a once off incident or repeated/ pervasive, and has the purpose or effect of violating an individual's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for that person. It can happen between an individual against another individual, either at the same hierarchical level or between individuals with different hierarchical levels and/or different contractual status, take the form of bullying, characterised by the underlying perception of an imbalance of power, and by the repeated or habitual use of force, physical and/or emotional aggression or coercion to intimidate or dominate others; and can also occur between a group and an individual, in which case it is referred to as "mobbing".

Harassment may be obvious or it may be insidious, and interfere with the recipient's ability to carry out their functions and/or create an intimidating or hostile work environment. Harassment can make someone feel anxious, angry, frustrated or humiliated. Stress, loss of self-confidence and self-esteem caused by harassment, bullying or mobbing can lead to job insecurity, illness, absence from work, and even resignation. Work performance is frequently affected and relations in the workplace suffer.

Harassment may be present in the form of words, gestures, or other actions that alarm, threaten, abuse, demean, intimidate, belittle, or cause personal humiliation, embarrassment or emotional distress to another person. Harassment may not necessarily happen face to face but may also occur in written communications, email, phone, and supervision methods.

Examples of harassing behaviour:

- Spreading malicious rumours, or insulting someone by word or behaviour: copying information that is critical about someone to others, ridiculing or demeaning someone – picking on them or setting them up to fail
- Exclusion or victimisation
- Unfair treatment
- Overbearing supervision or other misuse of power or position
- Making threats or comments about job security to intimidate or destabilise
- Deliberately undermining a competent worker by overloading and constant criticism
- Preventing individuals progressing by intentionally blocking promotion or training opportunities.

3.2. Sexual harassment

Sexual harassment is an unwelcome conduct of a sexual nature that may involve any conduct of a verbal, nonverbal or physical nature, including written and electronic communications, and may occur between persons of the same or different genders. It is unsolicited and unreciprocated, sexual advance, request for sexual favours, verbal or physical conduct or gesture of a sexual nature, or any other behaviour of a sexual nature including pornography, sexually charged remarks, that has or that might reasonably be expected or be perceived to offend, humiliate or intimidate another person.

Examples of sexual harassment include, but are not limited to:

- Making derogatory or demeaning comments about someone's sexual orientation or gender identity.
- Name-calling or using slurs with a gender/sexual connotation.
- Making sexual comments about appearance, clothing or body parts.
- Rating a person's sexuality.
- Repeatedly asking a person for dates or asking for sex.
- Staring in a sexually suggestive manner.
- Unwelcome touching, including pinching, patting, rubbing or purposefully brushing up against a person.
- Making inappropriate sexual gestures, such as pelvic thrusts.
- Sharing sexual or lewd anecdotes or jokes.
- Sending sexually suggestive communications in any format.
- Sharing or displaying sexually inappropriate images or videos in any format.
- Attempted or actual sexual assault, including rape.

3.3. Strategies to deal with harassment

- Communicate clearly to colleagues about their offensive conduct and demand that it stops.
- If the offensive behaviour doesn't stop, promptly document and report harassment through appropriate AFC mechanisms.
- Never excuse or minimise disrespectful or harassing behaviour.
- Ensure that individuals who bring concerns forward do not suffer retaliation, that they are not shunned, disparaged, or otherwise marginalised.
- Intervene promptly when alerted to alleged or potential acts of harassment and act promptly to attempt to informally resolve such incidents.
- Take a stand against incidents that could constitute harassment and support those concerned.
- Help to limit the damage caused by inappropriate behaviour by taking an active role and reporting wrongdoing to appropriate mechanisms at AFC.
- Cooperate fully with those responsible for dealing with a complaint of harassment and ensure that confidentiality is respected.
- Refrain from engaging in verbal or physical abuse, or acting in a way that creates an atmosphere of hostility or intimidation; encouraging others to engage in offensive behaviour; spreading gossip or rumours about a colleague; retaliating against, or encouraging others to retaliate against a staff member who has made, or has supported someone else in making a complaint, or has cooperated in the investigation of a complaint; filing a false or malicious complaint under this policy knowingly and deliberately, or encouraging or fuelling someone to do so, with a reckless disregard for the truth of the statements contained therein.

4. System security

You are responsible for ensuring the security of AFC computer systems. The following guidelines are compulsory for all AFC employees.

- Use approved, authorised and properly licensed software on AFC computer systems.
- Connect AFC authorised computers and equipment to AFC networks.
- Password sharing is not permitted.
- Attempts to circumvent or attack security controls on a computer system or network are prohibited.
- Access or downloads of sexually suggestive or explicit, gaming, file sharing, or other inappropriate files or websites is prohibited.
- Storage of inappropriate or pirated content on AFC equipment is prohibited.

5. Employee privacy

AFC retains the right to monitor its assets and work environments in compliance with applicable laws and this Code of Conduct. It monitors to promote safety, prevent criminal activity, investigate alleged misconduct and security violations, manage information systems, or for other business reasons.

Even though limited personal use of company assets is permitted, you should have no expectation of privacy when you use a AFC work space, computer, voicemail, or system to create, access, transmit, or store information. Such information is accessible to AFC even if it is password-protected, deleted by the user, or in a locked area. Limited personal use of company assets must also comply with this Code of Conduct.

6. Company records

When we do our work, we generate, receive, and use AFC information. Information is created every day, whether computerised or on paper. Each employee must manage AFC information carefully and responsibly, and be accountable for identifying records from information. AFC records must be stored, managed and disposed of in accordance with leading practice procedures.

Examples of company records include:

- Personnel documents.
- Reports to government agencies or other public communications.
- Workers' compensation or other benefit-related information.
- Financial reports.

When working with company information and records:

- Maintain accurate records.
- Never misstate facts or omit material information.
- Never hide, alter, falsify or disguise the true nature of a business transaction or commitment.
- Never forge endorsements, approvals or authorising signatures.
- Never process, enter into a system or approve a record or disclosure that you know is false or misleading.

7. Business expenses

Use AFC funds for business expenses only, whether paying by credit card, cash or another method in accordance with approved budgets. You're expected to comply with AFC's requirements for incurring and reporting business expenses, reporting all expenses accurately within 7 business days of incurring them.

8. Accepting or giving gifts

AFC has a strict no gift policy with all external stakeholders. Accepting or giving a gift in a business setting can create a sense of obligation or the appearance of obligation. A gift can be anything of value, including items such as a ticket to a sporting event or play, a non-business meal, a bottle of wine, a coffee cup, a free service, a special discount, or an all-expenses-paid trip to a conference or trade show. Please note that cash and cash equivalents (e.g., gift cards) are not "gifts" - they are compensation and are taxable. You may not accept cash or a cash equivalent as a gift. Also, you may not accept a payment or an item of value that could be construed as a bribe, or become party to the payment of money or an item of value for the purpose of bribery.

AFC-funded gifts between employees must not exceed \$30 USD.

Customary business meals are not considered gifts. These are routine meals, similar in cost to your own meals when you work out of town. These meals are subject to AFC business expenses policy.

9. Procurement

Our procurement activities are guided by internationally agreed core principles of value for money, effective competition based on equal treatment, and transparency and accountability. They are also guided by the AFC's

commitment to reinforcing environmentally and social responsible procurement practices to ensure sustainable consumption and production patterns.

The overall guiding objective for AFC procurement is to obtain the best value for money: i.e. the most advantageous bid based on a combination of factors related to price, quality, timely delivery, environmental performance, compliance with social and labour norms while considering life-cycle costing whenever feasible. To ensure that best value for money is obtained, the process of soliciting offers and selecting a contractor should:

- Encourage competition;
- Ensure impartial and comprehensive evaluation of proposals.
- Ensure selection of the offer that is the most practical and expected to best meet AFC's requirements stated in the request for proposals or invitation.

AFC procurement process allows for transparent competition among prospective providers who must be treated equally. Procurement standards of conduct in AFC ensures that all individuals directly or indirectly associated with the procurement function are responsible for protecting the integrity of the process and maintaining fairness, transparency and equal treatment of all prospective providers.

10. Scientific research

AFC is committed to research integrity, and promotes high quality research that is ethical, expertly reviewed, efficient, accessible, transparent, carefully monitored and rigorously evaluated. Misconduct in research may include:

- Fabrication/falsification of research data or outcomes.
- Plagiarism in proposing and reporting research.
- Misrepresentation of interest, qualifications, and experience, the failure to disclose contributions made by individuals/organisations.
- Inappropriate claims to authorship.
- Undisclosed duplication of a publication.
- Failure to comply with regulations or guidance for protecting human subjects, communities or the public.
- Failure to protect or the inappropriate use or disclosure of confidential or proprietary information, or the misuse of intellectual property.
- False or misleading reporting of research misconduct.

11. Declarations of interest

Contribution of external experts and consultants is essential to the work of AFC. When working with external experts or other consultants, including short term consultants, and researchers performing work requiring independence and objectivity, AFC staff members are required to ensure that they have disclosed any circumstances that could give rise to a conflict of interest related to the subject of the activity in which they will be involved by completing a declaration of interest form. The interests disclosed must be assessed by AFC before the expert/consultant's work can be confirmed. Failure to do so can reflect negatively on AFC, whose independence and impartiality may be overshadowed by engaging with external individuals who have conflicts of interest.

Conflicts of interest can be of a financial nature, arise from personal relationships/ family members, take the form of intellectual bias, or generate unfair or competitive advantage.

12. Non compete obligations

Employees, advisors, or consultants are provided trade secrets, customers and other confidential data and good will. The said information is confidential and shall not be used on anyone's own behalf or be disclosed to any third party and reasonable security measures have to be taken by all stakeholders to prevent accidental disclosure.

Employees, advisors, or consultants shall not own, manage, operate, consult or be employed in a business substantially similar to, or competitive with, the present business of the Organisation or such other business activity in which the Organisation may substantially engage during the term of employment.

This non-compete obligation shall be in full force and effect during the period of employment, advisory or consultation and for one year following termination of said service, notwithstanding the cause or reason for termination. This agreement shall be binding upon and inure to the benefit of the parties, their successors, assigns, and personal representatives.

13. Post-employment/consultation obligations

Upon separating from service with AFC as an employee, advisor, or consultant, obligation of discretion and confidentiality with regard to official matters does not cease.

In particular, affiliates shall not communicate to any person any information known by them by reason of their former position; nor shall they in any way use such information to their private advantage. This would include the use of such information to influence the decisions of third party entities, with a view to seeking employment with such entities for a cooling off period of 12 months.

14. Reporting and prohibition of retaliation

Any individual either external or internal to AFC that believes an incident of harassment, discrimination or violation of this Code of Conduct has taken place, should report this in the knowledge that it will be investigated swiftly and without prejudice. Reports will be acknowledged within three business days and investigations and relevant processes will be actioned within 10 business days.

Threats, intimidation or any other form of retaliation against those who has make a complaint or provide information in support of a complaint are prohibited. AFC will take any reasonable appropriate action needed to prevent and respond to retaliation, in accordance with its applicable policy, regulations and rules. The victim of alleged harassment may also seek help from other relevant authorities, such as the police, bearing in mind the applicable legal framework.

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