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## Lytton Springs Limited (Kenya) Code of Ethics

### What is the Code of Ethics?

The Code of Ethics is a set of guidelines intended to support ethical behaviour and decision making for all employees of Lytton Springs Limited, Kenya. The term ‘employees’ include all management, staff, volunteers, contractors and others who provide services for the company.

In this document you will read about the values, policies and behavioural expectations that, together, comprise the Lytton Springs Limited Code of Ethics.

Building and maintaining trusted relationships with employees, consumers, partners and the community is fundamental to our services, our reputation and our success. Managing in an ethical way, guided by a sense of social responsibility, is not just a matter of good practice but is the right thing to do.

We are often faced with challenges that require difficult decisions. This Code of Ethics explains the behaviour that is expected of all employees at all levels in the organization.

Each employee is responsible to become familiar with the Code of Ethics, comply with ethical and legal standards of conduct, and to lead by example in the workplace.

### Introduction

As employees, we all make decisions every day that affect one another, our clients and the company. The actions we choose to take as individual employees reflect on us all and influence how others perceive our company. Each of us, through our actions and decisions has the power to improve our workplace, build the trust of our clients and partners and enhance our reputation. This Code of Ethics provides an overview of key practices and behaviours that define the conduct to which we hold ourselves accountable.

### Compliance to the Code of Ethics

Employees are expected to comply with the Code of Ethics and the policies it represents. Violations of the Code of Ethics and/or policies may result in disciplinary action up to and including dismissal.

For new employees, please review the Code of Ethics carefully and familiarize yourself with the contents. Following your review please sign the staff agreement at the end of the document and take it to the Human Resources Department.

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## What you can expect from Lytton Springs Limited?

Lytton Springs Limited commits to providing all employees with:

1. A safe, healthy, respectful and productive work environment;
2. An environment free from discrimination and harassment that promotes and protects:
  - Equal opportunities
  - Fair and equitable treatment
  - Respect for diversity
3. Protection from retaliation after good faith disclosures of improper activities.

## What Lytton Springs Limited expects from you

The company expects all employees to:

1. Act with integrity at all times;
2. Be present and productive during working hours;
3. Operate within the law;
4. Follow the Code of Ethics and related policies;
5. Adhere to professional practice guidelines and practice within professional boundaries;
6. Take personal accountability for their own workplace actions;
7. Demonstrate a sense of respect, loyalty, good faith and responsibility toward one another, the clients and the organization;
8. Keep all organization and client information confidential;
9. Always dress decently at work and when visiting clients and other company's stakeholders.
10. Make good use of the company's equipment and other assets, and only for duties related to the company (e.g. not to use company assets such as telephones for personal reasons).
11. Exercise sound judgment in decision making; and
12. Report violations of the Code of Ethics and related policies.

## A Guide to Lytton Springs Limited Personnel Policies

### Attendance at Work

#### Examples of Acceptable Conduct

1. Regular and punctual attendance.
2. Reporting to and leaving work according to specified work hours.
3. Advising supervisor if you are going to be late or absent. Providing a Doctor's note for sick leave as required.
4. Having a coverage plan in place as required.
5. Submitting time-off requests for all leaves in an accurate and timely manner.

#### Examples of Unacceptable Conduct

1. Failing to report to work punctually;
2. Reporting late for work on a regular or habitual basis, leaving the work place early and without following established protocol.
3. Taking extended lunch or breaks.
4. Absence from work without authorization or justifiable reason.
5. Failure to provide a doctor's note for absence due to illness if so requested.

### Competence and Productivity

#### Examples of Acceptable Conduct

1. Performing work according to the job requirements, and in a competent, careful and productive manner.
2. Using lieu time or vacation or other approved credits to address personal issues.

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3. Meeting professional regulations and standards for regulated professionals.
4. Maintaining professional credentials and/or licenses as required for position and providing proof to the employer.

### **Examples of Unacceptable Conduct**

1. Substandard, incompetent and/or careless work performance that is within the control of the employee.
2. Contravening legislation (i.e., discriminating against clients or co-workers).
3. Spending time on non-work related matters (i.e., personal phone calls, chatting with co-workers about non-work related matters etc.).
4. Failing to seek clarification or failing to access company guidelines when information or guidance is needed.
5. Failing to maintain professional credentials.
6. Failure to report critical incidences as described in professional guidelines or organization policies.

## **Compliance with Supervision**

### **Examples of Acceptable Conduct**

1. Complying with the directions of the employer.
2. Performing tasks as directed by the supervisor and within acceptable standards.

### **Examples of Unacceptable Conduct**

1. Refusal to perform work assignments.
2. Refusal to comply with Lytton Springs Limited's policies and procedures, and regulatory/safety requirements of which the employee should reasonably be aware.

## **Lawful and Honest Conduct**

### **Examples of Acceptable Conduct**

1. Behaving in an honest and trustworthy manner.
2. Complying with the law while engaged in the work for Lytton Springs Limited.
3. Accepting Gifts from clients with a value of less than 2000.00. KSh.
4. If in receipt of an honorarium or stipend relinquish it to the agency.

### **Examples of Unacceptable Conduct**

1. Dishonesty; deception; theft; falsification of records including that contained in a resume or job application;
2. Fraudulent conduct and any other illegal behavior.
3. The unauthorized use of the company's equipment, supplies or other resources.
4. Soliciting and/or accepting gifts from suppliers, or a business of any value in return for favours or for any other purpose.
5. Accepting gifts from clients in cash, or anything of equivalent value over 2000.00. KSh, including gift cards, gift certificates, and tickets.

## **Confidentiality and Privacy**

### **Examples of Acceptable Conduct**

1. Maintaining information about clients, employees, and donors, in compliance with the relevant privacy legislation.
2. Maintaining information of a business nature such as quotations from suppliers.

### **Examples of Unacceptable Conduct**

1. Releasing information about clients; donors, or staff members without their consent and/or without the review/approval of the managing director.

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2. Releasing a quote to a competitor from a supplier bidding on a contract.
3. Altering or omitting relevant clinical information in a client file or submitting false information for or on any client record, report or document.

## **Care and Maintenance of Property**

### **Examples of Acceptable Conduct**

1. Appropriate maintenance and use of Lytton Springs Limited's property such as equipment, (computers, copiers, vehicles) grounds, supplies etc.

### **Examples of Unacceptable Conduct**

1. Failure to service equipment as required, deliberate damage to the company's property and/or unauthorized use of the company's equipment, supplies, resources or property.
2. Misuse or waste of assets or equipment.
3. Unauthorized removal of agency property.

## **Appropriate Behavior/Conduct**

### **Examples of Acceptable Conduct**

1. Behaving in a manner that is appropriate when interacting with clients, the general public, and other staff.
2. Acting at all times in such a manner to represent Lytton Springs Limited in the community in a positive manner.
3. Co-operating with co-workers in work-related activities.
4. Acting in a manner that meets the ethical standards of the company.

### **Examples of Unacceptable Conduct**

1. Profane language, threatening or abusive language to clients, the public, volunteers, or employees/ affiliates.
2. Engaging in personal relationships with clients.
3. Disregard of professional boundaries in relationships with co-workers, subordinates, volunteers.
4. Sexual exploitation – unwanted sexual or romantic encounters.
5. Other Boundary Violations – inappropriate touching, breach of confidentiality.
6. Breaching ethical standards of the company.

## **Dress Code**

### **Examples of Acceptable Conduct**

1. Staff should at all times present in a neat, clean and professional manner, recognizing they are representing the agency.
2. Staff may dress in a comfortable manner when visiting clients in the community, but must ensure that they present in a professional manner.
3. Staff in the office should dress in a business-like manner. Business casual is acceptable.

### **Examples of Unacceptable Conduct**

1. Torn and/or dirty clothing.
2. Bare midriffs; clothing that is too tight, too short (i.e., skirts, shorts); low cut tops; low rise pants; transparent clothing (see-through); and shirts with words or phrases that might be offensive to other staff, clients or the general public.

## **Violence and Harassment in the Work Place**

### **Examples of Acceptable Conduct**

1. Refraining from any physical abuse or violence or threats of violence in the workplace.
2. Not engaging in bullying and harassing behavior.
3. Reporting behavior that contravenes legislation and agency policy.

### **Examples of Unacceptable Conduct**

1. Physical abuse, violence, threats of violence, bullying or intimidating behaviour aimed at or involving other employees, volunteers, or clients.
2. Threats, unwanted or unnecessary physical contact.
3. Bullying, harassing or demeaning behaviour or making comments that should be known to be unwelcome and disrespectful.

### **Non-Impairment**

#### **Examples of Acceptable Conduct**

1. Employees shall not be impaired by prescription or non-prescription medication(s) or other substances while in performance of their duties.
2. Employees, affiliates shall not use alcohol or illegal drugs while in performance of their duties.

#### **Examples of Unacceptable Conduct**

1. Being under the influence of alcohol, or drugs to impair the ability to perform one's job, or interaction with clients, the public, or other employees.

### **Conflict of Interest**

#### **Examples of Acceptable Conduct**

1. Employees shall immediately report any potential conflict of interest to their supervisor and will be guided by the direction provided as to their continued involvement in the venture.
2. Reporting any other employment or volunteer work, or personal relationships that may be perceived to be a conflict of interest such as Manager and staff, staff and supplier, to the supervisor and being guided by direction provided.
3. Employees shall not use information learned through their employment for personal gain.

#### **Examples of Unacceptable Conduct**

1. Failure to advise the supervisor of a potential conflict of interest situation or one that is a perceived conflict of interest (i.e., that may be seen by others to represent a conflict of interest).
2. Engaging in other work without the supervisor's consent.
3. Failing to advise supervisor of volunteer service.
4. Failing to advise the supervisor if an employee is in a relationship with a direct report, Manager, client or other person who could be viewed to be a conflict of interest
5. Improperly using a position to influence the hiring or awarding of a contract to a family member or friend.
6. Disclosure of confidential, privileged or proprietary information to advance your own interests.
7. Engaging in activities outside of work that are in direct competition with company activities.
8. Supervision of family members, partners or close friends who are also employees of the company.
9. Conduct perceived as unfair competition practice relating to the procurement of contracts.
10. Failure to disclose a conflict of interest in contracting for goods and services.

### **Acceptable Use**

#### **Examples of Acceptable Conduct**

1. Use of phones, computer, email, intranet and internet access for company purposes only.

#### **Examples of Unacceptable Conduct**

1. Excessive and/or unauthorized personal use of phone.
2. Using the company telephone for non-company reasons such as calling friends and family.
3. Using the company's internet for accessing websites that would be violation of the Human Rights Code and/or company policies, for example visiting pornographic sites.

### **Whistle Blowing**

**Examples of Acceptable Conduct**

1. Lytton Springs Limited encourages employees to report improper or unethical activities without fear of reprisal. All alleged improper activities will be investigated by the appropriate Manager, while the reporter's confidentiality is maintained.

**Examples of Unacceptable Conduct**

1. Failure to report improper or unethical behaviour.

**Ownership and Frequency of Review of this Policy Document**

This Code of Ethics document remains the property of Lytton Springs Limited, Kenya. The interpretation of this document also resides with the company's Board of Directors.

This policy document shall be subject to review every three (3) years or as may be deemed necessary. All suggestions for review and or amendments shall be forwarded to the company's Board of Directors for necessary action.

Although this document shall be hosted in the official website of Lytton Springs Limited, Kenya, the Management of the company and each employee shall ensure strict compliance with this Code of Ethics.

**Staff Declaration**

I have received the Lytton Springs Limited Code of Ethics, which I have read and understood.

NAME:-----

STAFF NO:-----

SIGNATURE:-----

DATE-----

Please print and return this page to Human Resources Department.