

Andela Employee Handbook

(Updated 10.13.2017)

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Summary

We are excited that you are here. This handbook goes over central employee policies for all Andelans. There are other policies specific to each Andela location. You can find them all on the [People & Culture Intranet](#).

Handbooks can feel like a long list of rules. Thank you for your patience in reviewing this and knowing that as we grow, knowing what the rules are, will help us align our actions around our shared mission.

ps- This is a living document, which we will update periodically.

While this is not a statement of benefits, there are many benefits to working at Andela. As a global business, each location has their own benefit package for employees. Please visit your [local intranet](#) or People & Culture team for more information on benefits.

While we outline lots of important information here, the BLUF (Bottom Line Up Front) is to put your colleagues, Andela and our collective mission before yourself, to use good judgement, to always be safe and be smart about how you conduct yourself at work. Andela is bigger than any one of us and we have a responsibility to protect its ability to grow safely and responsibly. All Andelans are expected to know and follow our [Code of Conduct](#).

The bullets below give you a high-level summary of 'The Handbook', but please read through the specifics.

- We live by our EPIC values. See below.
- Andelans' core work hours vary by location, but generally each Andelan should be working a minimum of eight hours a day and we often have to accommodate work hours across time zones to communicate with our colleagues.
- At Andela, we encourage arriving punctually at agreed times, and being flexible enough to help achieve our objectives.
- To achieve our goals, everyone has to take care of themselves when sick. Communicate with your team early and often and get back in bed and drink water, silly.
- People need time off. It's proven to help employees focus and be effective when they are working. So take it! Clear these days well in advance with your manager. Prepare and organize others to anticipate your absence and not let anything drop while you are away. Then go do whatever you love and come back refreshed and ready to crush it.
- Andela is an equal opportunity employer. We outcompete through diversity, remember?
- We want you to succeed wildly. Andelans represent our values through our behaviors. If people aren't doing so, we try to help get you back on track.
- Andelans advance through merit alone. Every year we undergo performance reviews to document our previous achievements, call out areas for improvement and set clear goals for the year ahead.
- We strive to remove the barriers to Andelans feeling limitless and reaching their personal and professional goals. One barrier is currency fluctuations. They are really frustrating and confusing. To help mitigate such changes, Andela will consider a cost of living adjustment every 6 months if cost of goods fluctuates more than 15%.
- Drug abuse of any kind is bad for you. This behavior is a risk to your health and our reputation. Andela prohibits any use of illegal drugs, and/or abuse of any other drug (including alcohol). If you are found to be in violation of this policy, you will be subject to termination. We are serious about this. We need your full brain, head, heart and body to achieve this mission.
 - o PS- intoxication at work by any drug (including alcohol) is a direct violation of this policy. If you are intoxicated at work, you will be subject to our discipline policy and/or immediate termination. Again, be safe, be smart and put Andela first.

- All new team members orient and onboard. It's fun!
- Saying goodbye to colleagues is part of the journey. If you leave, we want you to leave well so do an exit interview, help us learn, and stay friends and family.
- When you're at work, focus on work. If you find yourself considering your colleague more than your colleague, consent is a MUST. Harassment is not tolerated and for the workplace to remain focused, relationships cannot cause a conflict of interest or show favoritism. Have a question or concern? Speak to your People & Culture team.
- Andelans have open doors at every level. Whenever you have concerns, we recommend you talk to your manager and local team first, especially to address a specific problem. They are likely most familiar with those concerns. But all doors are open across the organization.
- Andela stands by a strict, no retaliation policy. Retaliatory behaviors include demotions, change in job assignments, or hostile attitudes between staff and peers, and such retaliation will result in disciplinary action up to and including termination.
- Any complaints or ethics violations may be reported to your manager, your HR representative, or Ethics & Compliance at EC@andela.com. All reports will be taken seriously, promptly, investigated, and resolved as appropriate, and will be regarded as confidential to the extent possible.
- Andelans follow best practices in internet security and IP including right to monitor. It's necessary for our business model and it's the right thing to do.
- We're a business casual business. Any questions on appropriate attire, see your local P&C.
- Andelans are road warriors! We travel all the time. When we rep Andela on the road, we uphold all the same values and policies. We travel so much, there's a whole [travel policy](#) guide. Know it and review it.
- Andelans use excellent judgement on social media. When in doubt, ask Comms! And pass all writing about Andela through Comms first as well.
- Andelans keep confidential info confidential, and we report anything that might be a problem to People & Culture.
- T&E: A summary of Andela's expense policy is:
 - o Act in Andela's best interest. Expense only what you would otherwise not spend and is worthwhile for work. Travel as if you were spending your own money.
- At Will: You are an at will employee.

If you have questions concerning eligibility for a particular benefit or the applicability of a policy or practice to you, see your local People & Culture department. Many subjects described in this handbook are covered in detail in official policy documents which can be found on the [People & Culture intranet](#). Please keep this handbook confidential within the Andela family.

And now on to all the fine print....

Values

Andela was founded on a simple truth: brilliance is evenly distributed, but opportunity is not.

0We unlock that brilliance by giving global companies access to untapped talent across Africa and creating an on-ramp to the digital economy.

Together, we are building an institution to impact the world for far longer than we will be here to witness. To do that, we must live our values and use them to guide our actions.

Excellence | We are lifelong learners who strive for mastery of our craft

- We prepare - then we deliver
- We solve problems and add value
- We expect to earn trust and respect

- We advance through merit alone

Passion | We believe we are going to change the world and act accordingly

- We pursue Andela's mission with unwavering energy and conviction
- We seek to inspire and to be inspired
- We challenge each other and walk away friends
- We embody grit and persistence

Integrity | We choose extraordinary people, then trust them to do the right thing

- We walk further to take the right path
- We want others to hold us accountable
- We speak honestly, even when it takes courage

Collaboration | We know our sum is greater than our parts

- We put Andela before ourselves
- We outcompete through diversity
- We are not limited by borders, real or imagined

Andela is a movement. Andela is a collection of brilliant minds across Africa. Andela is a programming sprint followed by a football match, leading into a rooftop dance party. Andela is a platform for tech-enabled growth around the world. Andela is a commitment that, while the digital revolution may have begun in Silicon Valley, its future will be written in Lagos, Nairobi, Accra, Kampala and cities across Africa.

If all this is a mouthful, just say **TIA: This is Andela.**

Code of Conduct

Employees of Andela should do the right thing – follow the law, act honorably, and treat each other with respect.

Andela expects all employees and all representatives of the company to know and follow our Code of Conduct. Failure to do so can result in disciplinary action, including termination of employment. You are expected to act in accordance and consistently with our policies and you have a duty to report misconduct.

It is not only management's responsibility to enforce our Code of Conduct but every Andelan's responsibility to promote a culture of ethics and compliance.

I. Avoid Conflicts of Interest

A conflict of interest may arise any time competing loyalties could cause you to pursue a personal benefit for you, your friends, or your family at the expense of Andela or our customers.

Avoid conflicts of interest and circumstances that give the impression of a conflict. Sometimes a situation that previously didn't present a conflict of interest may develop into one.

When faced with a potential conflict, ask yourself:

- Would this activity create an actual or apparent incentive for me to benefit myself, my friends, or my family?

- Would this activity harm my reputation or hurt my ability to do my job?
- Would this activity embarrass Andela or me if it showed up in the press?
- Would this activity benefit an Andela competitor?

If the answer to any of these questions is “yes,” the relationship or situation is likely to constitute a conflict of interest, and you should avoid it.

II. Ensure Financial Integrity and Responsibility

Ensure that money is appropriately spent, our financial records are complete and accurate, and our internal controls are honored.

If your job involves the financial recording of our transactions, make sure that you’re familiar with all relevant policies, including those relating to revenue recognition.

Never interfere with the auditing of financial records. Similarly, never falsify any company record or account.

If you suspect or observe any irregularities relating to financial integrity or fiscal responsibility, no matter how small, immediately report them.

III. Obey the Law

Andela will make every effort to abide by all applicable rules and regulations of every place in the world we do business.

Comply with all applicable legal requirements and understand the major laws and regulations that apply to your work. If you have any questions about these laws or other laws governing our work, please consult EC@andela.com or our legal counsel.

IV. No Retaliation

Never retaliate against anyone who reports or participates in an investigation of a possible violation of the Code.

Andela prohibits retaliation against any employee who reports or participates in an investigation of a possible violation of our Code, policies, or the law. If you believe you are being retaliated against, please contact Ethics & Compliance at EC@andela.com. All reports will be regarded as confidential to the extent possible.

V. Conclusion

We rely on one another’s good judgment to uphold a high standard of integrity for ourselves and our company. We expect all employees to be guided by both the letter and the spirit of this Code.

If you have a question or concern, don’t just sit there. You can contact your manager, your Human Resources representative, or Ethics & Compliance. You can also submit a question or raise a concern of a suspected violation of our Code or any other Andela policy through EC@andela.com.

Handbook Policy & Procedure Guidelines

Joining Andela

New employees at Andela upon their resumption or start date are required to participate in an Induction and Onboarding program to assist them to adjust to their new responsibilities and work environment, and integrate them into the Company's brand, values, culture and benefits.

Employees will normally participate in both a corporate Induction program and a work area specific Onboarding or orientation program. All employees are required to be active participants throughout their Induction and Onboarding program. This includes seeking additional information, assistance and clarification if required. This procedure is applicable to all employees (fellows and staff members).

- **Corporate Induction and Onboarding**

This mandatory program consists of a series of sessions addressing policies and procedures, IT systems setup, accounts and payroll, workplace health and safety, fire and emergency management, equity and diversity, and compliance related topics.

- **Work area Induction and Onboarding**

In addition to the corporate Induction and Onboarding program, an employee may also participate in a specific work area training, Onboarding and orientation program, normally conducted by their line manager.

This program will cover issues specific to the work area and may vary depending on the location and the employee's role within the work area and at Andela. At the end of each induction/ onboarding session, a survey is sent out to get feedback on the sessions in which you participated.

No Retaliation Policy

Andela enforces a strict non-retaliation policy. Employees may not be retaliated against for informing management about an activity which you believe to be fraudulent, dishonest, or illegal with the intent or effect of adversely affecting the terms or conditions of your employment.

Retaliation includes but is not limited to threats of physical harm, loss of job, punitive work assignments, or impact on salary.

If you suspect or witness fraudulent, dishonest, or illegal activities, you are encouraged to raise these with management or you may also report incidents to Ethics & Compliance, EC@andela.com.

Anti-Corruption Policy

Our rule is simple - don't bribe anybody, at any time, for any reason.

Andela is committed to conducting its business with honesty and integrity and in compliance with the laws of all countries in which the Company is active. Andelans do not permit or offer promises to use any funds or other assets of value for any unlawful or improper purpose.

Be careful when you give gifts and pay for meals, entertainment or other business courtesies on behalf of Andela. Avoid the possibility that the gift, entertainment or other business courtesy could be perceived as a bribe. Provide such business courtesies infrequently and, when you do, to keep their value moderate.

All employees shall familiarize with Andela's [full anti-corruption policy and required certification](#) attached to the end of this handbook.

Professionalism and Good Conduct

Professionalism is an extension of our Andela values and code of conduct. You should be aware that example behaviors not specifically listed below, but which adversely affects or is otherwise detrimental to the interests of your colleagues and Andela, may result in disciplinary action, up to and including your immediate termination. Review [Andelans in Action](#) for more examples.

Unacceptable conduct and/or performance includes:

- Unsatisfactory work quality or quantity
- Unsatisfactory work attitude (for example, rudeness or lack of cooperation)
- Excessive absenteeism, tardiness
- Abuse of vacation and sick policy
- Failure to follow Andela's policies
- Failure to follow established safety regulations
- Examples of misconduct:
 - Insubordination
 - Dishonesty
 - Theft
 - Paying or facilitating bribes (directly or indirectly in anyway - see [anti-corruption policy](#) below)
 - Harassing a colleague
 - Intentionally misusing or destroying Company property
 - Violating conflict of interest rules
 - Disclosing or using confidential or proprietary information to anyone outside Andela
 - Falsifying or altering Company records, including the application for employment
 - Repeated disruptive behavior
 - Altercations
 - Gambling on Company premises or while conducting business
 - Possessing a firearm or other dangerous weapon on Company property or while conducting business
 - Being convicted of a crime that indicates unfitness for the job or raises a threat to the safety or wellbeing of Andela, its employees, customers, or property

Leaving Andela

Should you decide to end employment with Andela, the Company asks you to notify your manager and subsequently the P&C Lead in your office. Upon separation from the Company, all rights and privileges with Andela will be terminated and you will be required to return all your Company property. Failure to do so will result in the non-payment of your final salary and/or debt collection, until such a time as you have done so, where applicable by law.

Here are some high level things to expect upon exit/termination

1. Exit interview with the People & Culture department
2. Your email and systems will not be accessible after your last day

In the Spirit of Excellence and Integrity, note that employees resigning from Andela are generally asked to report at work until their effective last day stated and approved in their resignation notice. For accountability purposes, employees resigning are generally required to communicate daily with their line manager, informing them that they are at the Andela office. This process is required to ensure employee exits are handled with respect and dignity.

- **Termination**
When an Andelan fails to meet the terms and conditions of their employment at Andela, their employment may be terminated as stipulated in the employee's Employment Agreement.
- **Return of Company Property**
The separating Andelan must return all Company property at the time of separation, including ID cards, Access cards, computers, keys and any other Company property.
The separating Andelan shall contact the People & Culture department as soon as notice is given to schedule an exit interview. The interview will be on the employee's last day of work or another day, as mutually agreed upon.
- **Exit Interview**
Upon an employee's exit from Andela, the employee is required to conduct a compulsory exit interview with a member of the People & Culture Department. The essence of this interview is to complete necessary forms, collect Company property and discuss their experience with the Company.
- **Rehire**
Former Andelans who left Andela in good standing and were classified as eligible for rehire may be considered for reemployment. An application must be submitted to the People & Culture department, and the applicant must meet all minimum qualifications and requirements of the position, including any qualifying entry process, when required.
Supervisors must obtain approval from the People & Culture department prior to rehiring a former employee. Rehired employees begin benefits just as any other new employee.
Any former Andelan who is terminated for violating policy or who resigned in lieu of termination from employment due to a policy violation will be ineligible for rehire.

Employment at Will

Your employment with Andela is a voluntary one and is subject to termination by you or Andela, with or without cause, and with or without notice, at any time. Nothing in these policies shall be interpreted to be in conflict with or to eliminate or modify in any way the employment-at-will status of Andela employees.

Hours of Work

Andela, in its uniqueness, works across at least five time zones. We ask that you be mindful of your hours and the hours of your peers when scheduling meetings. The Company's workweek begins each Monday at 12:01 a.m. in your office specific time zone. The normal workweek for a full-time Company employee shall consist of five (5) days (at least 40 hours). Employees may request the opportunity to vary their work schedules (within employer defined limits) to better accommodate personal responsibilities. Your manager shall determine the hours and schedule that best suit the business needs. It is your responsibility to reach an agreement with your manager and if this agreement is outside the normal hours stated above, you need to inform your local People & Culture representative, so they can record this in your file.

Attendance and Punctuality

Attendance is a key factor in your job performance. Punctuality and regular attendance are expected of all employees. Excessive absences, tardiness or leaving early is unacceptable. If you are absent for any reason or plan to arrive late or leave early, you must notify your manager as far in advance as possible **before** the start of your scheduled workday. In the event of an emergency, you must notify your supervisor as soon as possible.

To better understand what's required of you upon an illness-related absence, please speak to your local People & Culture team. Local policies are all hosted on the [People & Culture intranet](#).

Excessive absences, tardiness or leaving early will be grounds for discipline up to and including termination.

Leave/Paid Time Off

Time off is an important element of remaining engaged and effective in your role. We recognize how hard you work and want you to take the time off to rest and recharge, so you can be at your best when you are in the office. For specifics on your local leave policy, please see your local office leave policy or your local People and Culture department. At some point in time, Andela may launch a global leave policy relevant to all employees, when such event happens, you will be notified of any changes.

In each Andela country location, each employee gets a total paid days off (unless this amount is overridden by country-specific labor laws). These 30 days are a combination of the minimum legally required leave (Vacation) days plus observed national holidays. This leave includes a mandatory holiday between December 25th and January 1st. For specifics on your country's labor laws, please consult your local People & Culture team and the intranet for leave information.

Employees and managers are expected to work together to accommodate time off requests while managing the operational needs of their individual team and the Company as a whole. When approving Paid Time Off, managers will take several factors into consideration, including:

- Business needs;
- The frequency and timing of any prior time off;
- The amount of consecutive time requested; and
- The notice provided, and the number of other requests for that time period.

Approval discretion ultimately lies with your manager, and you are responsible for ensuring that you are able to manage your time in and out of the office, and meet the expectations of your role.

Every time off request must be submitted through our HRIS or directly to your line manager and People & Culture.

In some cases, your annual leave may carry over or be subject to payout when you leave. If this case applies to your country specific policy, it will be detailed for you in your country specific Intranet and policy documents.

Sick Leave

Each Andela location has its own local laws regulating sick leave. Please see your office's policy on sick leave for further details.

[Lagos Sick Leave Policy](#)

[Nairobi Sick Leave Policy](#)

[US Sick Leave Policy](#)

[Kampala Sick Leave Policy](#)

Equal Employment Opportunity

At Andela, we outcompete through diversity.

We know that our strengths lies in the multiplicity of talents, perspectives, backgrounds and orientations resident in our community and we take pride in that. Andela is committed to a work environment in which all individuals are treated with respect and dignity. Each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits discriminatory practices.

Andela provides equal employment opportunities and workplace to all employees and applicants without regard to factors including but not limited to race, color, religion, gender, sexual orientation, gender identity, national origin, age, disability, pregnancy (including breastfeeding), genetic information, HIV/AIDS or any other medical status, family or parental status, marital status, amnesty or status as a covered veteran in accordance with applicable federal, state and local laws. This commitment applies to all terms and conditions of employment, including but not limited to hiring, placement, promotion, termination, layoff, recall, transfer, leaves of absence, compensation and training.

Our policies expressly prohibit any form of harassment and/or discrimination as stated above.

Anti-Discrimination & Anti-Harassment Policy

Andela complies with applicable national, state and local laws governing nondiscrimination in employment in every location in which the Company has facilities. This policy applies to all terms and conditions of employment, including hiring, placement, promotion, termination, layoff, recall, transfer, leaves of absence, compensation and training.

Andela prohibits any form of unlawful employee harassment based on race, color, religion, sex, gender, pregnancy, sexual orientation, gender identity, national origin, alienage or citizenship status, ancestry, age, physical or mental disability, genetic information, marital or partnership status, status as a victim of domestic violence, unemployment status, caregiver status, military or veteran status or any other status protected by applicable local, state or federal law. Improper interference with the ability of Andela employees to perform their expected job duties is absolutely not tolerated. Should you experience, be witness to, or hear of misconduct relating to harassment of any sort, please immediately notify someone on the leadership team or People & Culture and a member of leadership, if necessary.

Disciplinary Action

Every employee has the duty and the responsibility to be aware of and abide by existing rules and policies. Employees also have the responsibility to perform their duties to the best of their ability and to the standards as set forth in their job description or as otherwise established.

Andela reserves the right to determine the appropriate level of discipline for any inappropriate conduct, including oral and written warnings, suspension with or without pay, demotion and dismissal.

Performance Management

Performance should be discussed and evaluated continuously. For staff members (non-fellows) Andela strives to conduct performance appraisals on an annual cycle. Fellows will receive performance appraisals per the schedule outlined by the Learning and Success department. During official performance appraisals, performance against an individual's goals will be discussed, and both the employee and manager will sign appropriate documentation to ensure that all strengths, areas for improvement, and job goals for the next review

period have been clearly communicated. Performance evaluation forms will be retained in the employee's personnel file.

Please see your office's performance management section for more specifics on this process.

Cost of Living Adjustment Policy

As of August 2016, Andela will review the inflation in each country with Andela employees every 6 months (December and June). When inflation, as listed on The Consumer Price Index for the country, changes by more than 15% during that time period, Andela will consider making an adjustment to salary levels in Andela's sole discretion. Any decision to make an adjustment will be communicated and implemented by country leadership in the next month's pay cycle. Any adjustments will only apply to employees who have been full-time employees for over three months. If any Andelan has been in the company for less than three months when an adjustment is made, they will become eligible for an adjustment during the following 6-month adjustment period.

If employees are within three months of their hire date when any adjustment is made, they will become eligible for an adjustment during the following 6-month adjustment period.

Andela reserves the right to change this policy at any time.

Drug and Alcohol Policy

The abuse of drugs and any usage of illegal substances is prohibited in all Andela locations. Also, regardless of location, employees are not permitted to take any drugs (aside from necessary medications and other drugs approved by a medical professional) during official work hours. The use of illegal drugs or abuse of alcohol at work, at work sanctioned events, with other Andela employees, clients, advisors or other part of the Andela network is grounds for discipline up to and including termination.

Andela has a longstanding commitment to provide a safe and productive work environment. Alcohol and drug abuse pose a threat to the health and safety of employees and to the security of our equipment and facilities. For these reasons, Andela is committed to the elimination of drug and/or alcohol use and abuse in the workplace. This policy applies to all employees and all applicants for employment of Andela. Please see your office specific Alcohol & Drug Policy.

Relationships in the Workplace/Relationship Policy

The Andela Relationship Policy protects the ability for Andelans to both thrive in a professional environment and also have happy and healthy personal lives.

Andela provides a friendly workplace and is committed to maintaining an environment in which members of the Andela community can work together to further their careers. Andelans who engage in personal relationships (including romantic and sexual relationships) must put Andela first, be aware of their professional responsibilities and be responsible for assuring that the relationship does not impede a safe and productive work environment.

All relationships must be consensual and appropriate to the nature of one's specific role: i.e. must not raise concerns about favoritism, bias, ethics and conflict of interest. All Andelans must understand the definition of harassment and acknowledge that what seems OK to one person may be unwelcome to another person. Thus all Andelans must seek verbal consent to any romantic or sexual attention to clarify consent between both parties.

Dress Code Policy

It is important for all Andela employees to project a professional image while at work. We want you to feel comfortable at work while still being neat, clean and well-groomed while on the job. Clothing should be consistent with the standards for a business casual environment and must be appropriate to the type of work being performed. Andela is confident that employees will use their best judgment regarding attire and appearance. Management reserves the right to determine appropriateness. Any employee who is improperly dressed will be counseled or in severe cases may be sent home to change clothes. Continued disregard of this policy may be cause for disciplinary action, including termination.

Organizational Chart and Communications

You can find the link to the current Andela org chart on BambooHR. Please take a moment to review, and voice any questions to your People & Culture team.

Open Door Policy

This policy is meant to empower and encourage active listening across the organization as it relates to overall communication, feedback, and any matter of importance to any employee.

As a collaborative and dynamic team, we encourage every employee to have their voice heard. This means, literally, that every manager's door is open to every employee. Most problems can and should be solved in discussion with your immediate supervisor. This is encouraged as your first effort to solve a problem. But, an open door policy means that you may also discuss your issues and concerns with the next levels of management and/or People & Culture. You are free to talk with any manager at any time about any topic. If any area of your work is causing you concern, you have the responsibility to address your concern with a manager. Whether you have a problem, a complaint, a suggestion, or an observation, we want to hear from you. By listening to you, Andela is able to improve, address complaints, and foster employee understanding of the rationale for practices, processes, and decisions.

To be clear, this policy does not deem any manager responsible to solve issues brought up, and if any issue brought up falls under concern regarding misconduct, managers are required to notify People & Culture to perform a thorough investigation.

IT Policy and Security

Andela has a comprehensive [IT Policy](#) and all employees are expected to know and follow this policy.

Andelans are responsible for practicing world class security protocol including protecting the confidentiality of sensitive and proprietary information shared by partner organizations. Andela's IT security protocol are addressed in this [presentation](#).

Electronic Communication and Internet Use

The following guidelines have been established for using the Internet and email in an appropriate, ethical and professional manner:

1. Internet and Company-provided equipment and services may not be used for transmitting, retrieving or storing any communications of a defamatory, discriminatory, harassing or pornographic nature.
2. The following actions are forbidden: using disparaging, abusive, profane or offensive language; creating, viewing or displaying materials that might adversely or negatively reflect upon Andela or be contrary to Andela's best interests; and engaging in any illegal activities, including piracy, cracking, extortion, blackmail, copyright infringement, and unauthorized access of any computers and Company-provided equipment such as cell phones and laptops.
3. Employees may not copy, retrieve, modify or forward copyrighted materials, except with permission or as a single copy to reference only.
4. All email communication within Andela would remain the property of the Company and can be retained even after the user has deleted it from their mailbox. This would be a required tool that would be used to protect the interest and the business of the Company where necessary.
5. Acceptable Use: The Company email is meant for official purposes only, all other non-job related communication, information, requests etc., not relating to any job description or part of a process or procedure in relation to completing or maintaining a job or specific task, is not advised unless otherwise expressly stated or officially permitted by a supervising manager.

The following uses of Company email are not permitted:

- Using Andela email to send politically induced messages.
- Using Andela email to send messages containing inciting language.
- Using Andela email to send sexually oriented messages, including either to harass or disregard a sexual preference, all personal preferences of staff should be respected.
- Using Andela email to conduct fraudulent business or personal dealings.
- Using Andela email for bullying.
- Using Andela email to spread rumours.
- Using Andela email to advertise personal products or services that are not related to official dealings.
- Using Andela email to disrespect, bypass, or completely disregard the necessary procedure and process or protocol of a specific job or task.
- Using Andela email to initiate religiously related conflict.

Email Etiquette

Don't write anything that would be ruinous to you or hurtful to others. After all, email is dangerously easy to forward, and it's better to be safe than sorry. Below are some suggestions for email etiquette, please stay on brand and uphold Andela values when communicating internally and externally.

1. Include a clear, direct subject line.
2. Use your Andela email address.
3. Think twice before hitting 'reply all.'
 - a. Let's help each other cut down on emails. Ask yourself: Does everyone need to remain in copy? Can you slack a smaller group?
4. Include an Andela signature - [here are the instructions to update yours to the latest version \(below\)](#).

As of September 11th, 2017:



Your Name / [Andela.com](#)

Your title / 000.123.4567 / [@Andela](#)

Brilliance is evenly distributed.

This message contains confidential information intended solely for the use of the parties named above.

5. Proofread!! We are always representing Andela. Don't rely solely on spell-checkers. re-read your email a few times, especially important ones, before sending them.
6. The cardinal rule: Your emails should be easy for other people to read.
7. Nothing is confidential -- so write accordingly.

Andela Slack Channel Etiquette

Slack is an awesome work tool -- it's fun and illustrates our incredible culture. Even when we're having fun, remember to be professional and respectful. Slack is not for entirely personal conversations. Slack is not a tool to publicly attack or call out others.

[Here are some other helpful Slack best practices to keep in mind.](#)

Social Media Use

Below are guidelines for social media use.

1. Employees may not post financial, confidential, sensitive or proprietary information about the Company, clients, employees or applicants.
2. Employees may not post obscenities, slurs or personal attacks that can damage the reputation of the Company, clients, employees or applicants.
3. Andela may monitor content out on the Internet. Policy violations may result in discipline up to and including termination of employment.

Travel Policy

Traveling with Andela should be an enjoyable and enriching experience. Our guidelines and policies on travel are designed to ensure that all travel and expenses are aligned with our values and business objectives and ensure fair treatment of all Andelans with regard to travel and expenses. For specifics on the travel policy, please see the Travel section of the global intranet, where much more in-depth details are provided. While traveling, in addition to the below acknowledgements, you acknowledge to abide by Andela's Code of Conduct.

Policy on illegal activity during travel

- All illegal activities, including illegal drugs, are strictly prohibited while at work, at Andela-sponsored work events or on Andela work trips - including in Andela sponsored housing and at any other Andelan location. They are grounds for immediate dismissal.

Agreement and Condition of Travel

- Any employee that is traveling with Andela must agree to return to their country of residence at the end of the trip on the dates agreed upon in the agreement of travel. In addition to this a traveling employee agrees to:
 - report physically to work at the Andela work location at the end date of the trip and as requested by the Company;

- acknowledge that loss of Company owned items during Andela-sponsored work event/trip will be reimbursed by the employee in the stipulated time period assigned by the Finance department; and
- agree to use this card provided by Andela under the provided T&E guidelines, see P&C for a clarification on the T&E policy coverage.

Safety and Security while traveling

- An Andelan's safety is of utmost importance when traveling. Please put your own safety first and when possible please alert any member of People & Culture of any emergency situation. Please first contact your local emergency services if you are hurt or in danger.

Solicitation and Gifts

Employees should consult with the Leadership team or People & Culture Department on the appropriateness of any gift exchange. In order for the organization to maintain its independence, professionalism and to avoid conflict of interest, it is advised to not solicit gifts, loans, coupons, discounts and other forms of remuneration for personal benefit directly or indirectly from third parties. Occasionally, unsolicited non-cash gifts and meals of a reasonable value [\$65 (equivalent in NGN and KSH)] may be accepted, provided that the provision of such meal or gift also complies with the other terms of this policy.

In cases of apparent breaches of this policy, the People & Culture department in conjunction with relevant parties will commence an investigation and disciplinary procedures, including possible termination.

Confidential Information

From time to time, employees of Andela may come into contact with confidential information, including but not limited to information about Andela members, suppliers, finances and business plans. Employees are required to keep any such matters that may be disclosed to them or learned by them confidential.

Furthermore, any such confidential information, obtained through employment with Andela, must not be used by an employee for personal gain or to further an outside enterprise.

Intellectual Property

Any intellectual property, such as trademarks, copyrights and patents, and any work created by an employee in the course of employment at Andela shall be the property of Andela and the employee is deemed to have waived all rights in favour of Andela. Work, for the purpose of this policy refers to written, creative or media work. All source material used in presentation or written documents must be acknowledged.

Incident Reporting

There's a lot that can happen in a global business. Sometimes this means you need to report an issue or record its instance. The first place to turn when you think you've experienced, witnessed, or been party to an incident is your local People & Culture team. As an Andelan, it is your responsibility to report anything and everything that you think could be an incident warranting an incident report. There is not a hard definition of what an incident entails. Best practice is that if it feels like it goes against our values or code of conduct, it warrants an incident report. If you believe you've been party to an incident, please first contact your local People & Culture team. They will advise you on your report and provide you with the proper documentation to fill out.

Work Related Injuries

Any injuries suffered by employees during work hours or during work duties needs to be reported immediately to your supervisor and P&C. Such reporting will include information about the time, date, location, and manner of the injury, reports from or to any doctors, and any other relevant information surrounding the incident.

Andela Offices Contact Information

Lagos, Nigeria
Andela Epic Tower, 235 Ikorodu Road, Ilupeju, Lagos, Nigeria
070.8139.1897

Nairobi, Kenya
525 Kindaruma Rd. P.O. Box 25810-00603, Nairobi
+254.792.745.341

New York, USA
129 W 29th Street, 4th Floor, New York, NY 10001
646.726.4003

Kampala, Uganda
Ntinda Complex
The Innovation Village, 3rd floor

Andela, Inc.

Anti-Corruption Policy

The nature of our business often requires that we interact with officials of various governments around the world. Andela Inc. (hereinafter “the Company”) policies and applicable laws establish certain limits on those interactions.

The Company is committed to doing business with integrity. This means avoiding corruption of all kinds. It is the policy of the Company to comply with all applicable anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (“FCPA”), the U.K. Bribery Act (“UKBA”), and the local laws in every country in which we do business. These laws prohibit bribery of foreign government officials (broadly defined later in this policy), and regarding the FCPA, mandate that companies establish and maintain accurate books and records and sufficient internal controls. The UKBA also prohibits private sector (commercial) bribery.

A violation of anti-corruption laws can lead to severe civil and criminal penalties and is cause for disciplinary action (up to and including termination of employment); therefore, it is vital that you not only understand and appreciate the importance of these policies and procedures, but comply with them in your daily work.

This policy applies to all employees of the Company, including officers and directors. In addition, the Company will require third parties who represent the Company (such as agents, consultants, and contractors) to conduct themselves in a manner consistent with this policy.

All employees and third parties should remain vigilant in watching for, avoiding, and reporting to the Compliance Department and Finance Department any questionable transactions that may violate this policy.

Although this policy focuses primarily on compliance with the FCPA and UKBA, it is necessary to remain equally attentive to compliance with all applicable corruption laws, including the federal, state and local laws of each country in which the Company operates. The FCPA, UKBA, and local corruption laws will be referred to collectively as “Applicable Corruption Laws” in this policy.

For the purposes of this policy, the term “government official” is broadly defined to include:

- Any officer or employee of any government entity, department or agency.
- Any employee of a state or government-owned business, school, hospital or other entity
- Any political party or official thereof.
- Any candidate for political office.
- A public international organization or any department or agency thereof (e.g., the United Nations, Olympic Organizing Committee, FIFA Committee, etc.).
- Any person acting in an official capacity on behalf of a government entity.

Employees of state-owned or state-controlled commercial enterprises (such as an oil company that is majority owned by a government) are considered government officials under Applicable Corruption Laws and this policy. It is important to keep in mind that even persons who are not deemed to be officials under local laws may still be considered government officials under the FCPA and UKBA. To be certain, employees should always consult the Compliance Department whenever there is a question as to whether an individual is a government official.

Prohibition on Bribery

Applicable Corruption Laws prohibit companies and their employees and representatives from (directly or indirectly) giving, promising, offering or authorizing payment of anything of value to any government official to obtain or keep business or to secure some other improper advantage. These laws prohibit the giving of anything of value to influence a government official's actions. Prohibited payments include, but are not limited to, those designed to:

- Induce the recipient to award a contract to the Company.
- Obtain advantageous tax, immigration or customs treatment that would not otherwise be available to the Company.
- Circumvent or cause non-enforcement of laws or regulations applicable to the Company.

The prohibition on bribery applies to the giving of anything of value, not only money. This includes but is not limited to providing business opportunities, favorable contracts, stock options, gifts and entertainment. Such payments are barred even if:

- The benefit is for someone other than the party making the payment.
- The business sought is not with the government.
- The payment does not in fact influence the government official's conduct.
- The foreign government official initially suggested the payment.

The UKBA also specifically prohibits the offering or acceptance of corrupt payments and other advantages between private (non-government) persons and entities. Such conduct constitutes commercial bribery and is prohibited.

Facilitating Payments

Facilitating (or expediting) payments also are prohibited under this policy. Facilitating payments are small payments paid to foreign government officials to expedite or facilitate non-discretionary actions or services, such as obtaining an ordinary license or business permit, processing government papers such as visas, providing police protection, providing telephone, power or water service or loading or unloading of cargo.

Although there is a narrow exception for facilitating payments under the FCPA, such payments are prohibited under the UKBA and the laws of many other countries. Therefore, to ensure compliance with all Applicable Corruption Laws, our Company prohibits facilitating payments altogether, except for personal safety payments described below.

Except as provided herein, employees are prohibited from providing anything of value to any foreign official, regardless of rank; or to any person while knowing or being aware that all or a portion of it will be offered, given or promised (directly or indirectly) to a foreign government official.

Permitted Payments

Although this policy is intended to provide guidance, anti-corruption matters are not always clear and must often be addressed on a case-by-case basis. In all situations where there is a question, employees should consult the Compliance Department and Finance Department prior to taking action.

Services

The Company may pay for legitimate services provided to the Company by a foreign government

entity or government official, such as paying a government-owned utility company for electricity. Payments for any services rendered to the Company by a foreign official (including an officer of a foreign government-owned or controlled commercial enterprise), including honorarium payments and reimbursement of expenses, must be made in accordance with the financial and accounting directives set forth in this policy.

Gifts, Meals, and Entertainment

Under certain circumstances, it may be permissible to provide modest gifts or a meal or other entertainment to a government official as a social amenity. When deciding whether a gift is appropriate, employees also must consider any past, pending or future business or administrative matters that are within the recipient's realm of influence. The timing and context surrounding such gift or entertainment must be weighed to assess whether any particular gift or entertainment could be perceived to be a bribe.

Generally, gifts, meals and entertainment are permissible, provided that:

- Hospitality offered on behalf of the Company must be directly related to Company business, i.e., the marketing or sale of its services.
- Hospitality in all cases must be reasonable in amount, must be offered in good faith only relating to the promotion, demonstration or explanation of Company services or the execution or performance of a contract with a foreign government or agency thereof, and must be lawful under applicable local law.
- There is no expectation that the gift, meal or entertainment is given in exchange for any return favor or business advantage from the government official (quid pro quo);
- The gift, meal or entertainment is infrequent, reasonable, and proportionate in amount under the circumstances; and
- The gift, meal or entertainment is lawful under Applicable Corruption Laws.
- Frequency of hospitality must be carefully monitored, as the cumulative effect of frequent hospitality may give rise to the appearance of impropriety. Hospitality for any government official should not exceed twelve events in any calendar year. If additional hospitality is anticipated, prior written approval must be obtained from the Finance Department.
- Unless otherwise approved by the Finance Department in writing, expenses for hospitality meals should not exceed the following U.S. dollar amount or African-equivalent dollar amount (equivalent in NGN and KSH) per person:
 - Breakfast: \$50.00 USD or \$30.00 (equivalent in NGN and KSH);
 - Lunch: \$75.00 USD or \$45.00 (equivalent in NGN and KSH) ;
 - Dinner: \$150.00 USD or \$80.00 (equivalent in NGN and KSH);
 - Refreshments unaccompanied by a meal should not exceed \$50.00 USD or \$30.00 (equivalent in NGN and KSH) per person.
- Cash gifts to government officials are not permitted under any circumstances. Per diem payments to government officials are also prohibited.
- Promotional items of nominal value such as coffee mugs, calendars, or comparable items, or items displaying the Company logo that are distributed for advertising or commemorative purposes, or gifts of nominal value on customary holidays are permitted. "Nominal value" is \$150.00 USD [\$65.00 (equivalent in NGN and KSH)] or less.
- In the event the Company is responsible for the airfare or lodging expenses of a government official, itineraries and any other supporting documentation shall be maintained. In no case will payment or reimbursement be made directly to the government official incurring the expense;

such payment or reimbursement shall only be made directly to the service provider (e.g. the airline) or the foreign government or agency involved. Expenses beyond what is reasonably necessary for the business purpose, including lavish accommodations or expenses for spouses and children, will not be approved. The local controller must approve all travel for government officials in advance of the trip.

- In all cases that entertainment, gifts or travel expenses are approved, the expenses must be supported by receipts and accurately recorded in the Company's books.

Personal Safety Payments

Personal safety payments are permissible under this policy. A personal safety payment is a payment to avoid imminent physical harm. Personal safety payments do not include payments made in response to commercial duress, or in response to threats to commercial, financial or other interests. If confronted with a situation in which you believe that there is an imminent threat to your health or safety, you must use your best judgment in determining whether to make a personal safety payment. If you reasonably elect to make a personal safety payment, you will not be subject to discipline under this policy, but those payments must be immediately reported to the Compliance Department and Finance Department. The Company will not reimburse you for such payments.

Donations

Donations made to foreign-based charities are permissible, provided that all donations made by the Company to foreign charitable organizations are permissible under the FCPA and local law, pre-approved by the Compliance Department and the CFO, International Operations, and properly documented and transparent.

Political Contributions

Contributions to international political parties or committees or to individual politicians may only be made with the prior written consent of the Compliance Department. Approved contributions must be made in accordance with the applicable law, and all requirements for public disclosure of such contributions shall be fully complied with.

Third Parties

Applicable Corruption Laws prohibit corrupt payments made directly by Company employees or indirectly through a third party such as a consultant acting for or on behalf of the Company.

Under the FCPA, it is unlawful to make a payment of anything of value to any person, knowing that all or any portion of the payment will be offered, given or promised to a government official or any other person for a corrupt purpose. The term "knowing" includes conscious disregard, deliberate ignorance, and willful blindness. In other words, the Company and individual employees may violate the FCPA if we have "reason to know" or "should have known" that a third party will bribe a government official.

Under the UKBA, a company can be held criminally liable for bribes paid on its behalf by a third party anywhere in the world – even if the company had no knowledge of the bribe.

Accordingly, the most crucial step the Company can take to protect itself from liability for improper payments made by third parties is to choose its business partners carefully.

The Company will conduct appropriate due diligence and will exercise care in selecting such third parties by employing only reputable entities and will pay only reasonable compensation for the services provided.

The Company will require third parties who represent the Company to conduct themselves in a manner consistent with this policy. Such third parties will periodically be required to provide the Company with a certification of compliance with all applicable laws, including any Applicable Corruption Laws.

In addition, agreements with certain third parties must contain representations and warranties regarding the third party's agreement to comply with Applicable Corruption Laws.

Due Diligence; Mergers or Acquisitions

The Company will not enter any relationship with a third party who will have substantive interaction with government officials on behalf of the Company without an inquiry into the third party's background, qualifications and reputation. Any issues raised during this due diligence review must be addressed to the satisfaction of the Company prior to entering the relationship. The amount of time and effort required for due diligence will depend on the number and complexity of issues raised during the review process.

Employees will inform the Finance Department and Compliance Department once they have identified a third party that is subject to due diligence review.

In the event of a merger or acquisition, sufficient due diligence must be performed to assure the Company of the acquisition target's compliance with applicable anti-corruption laws, including the FCPA and UKBA.

Red Flags

In evaluating potential third parties and during any relationship with them, Company employees must be conscious of any "red flags" that may be present or arise. A "red flag" is a fact or circumstance that serves as a warning signal that a third party may act corruptly. It is the responsibility of the employee that observes a red flag to refer the matter to the Compliance Department and Finance Department. A non-exclusive list of examples of red flags is below:

- Rumors regarding unethical or suspicious conduct by an employee, marketing representative, consultant, agent, or other business partner, or by a government official.
- Unnecessary third parties, multiple intermediaries or suggestions to use an intermediary.
- Requests for payments to a second third party rather than the consultant or agent.
- Requests for payments in a country other than where the third party resides or performed the services.
- Requests for payments in cash.
- Requests for unusually large commissions or other payments, or payments that appear excessive for the service rendered.
- Requests for reimbursement of expenses that are poorly documented.
- Incomplete or inaccurate information in required disclosures.
- Refusal to certify compliance.

Recordkeeping and Reporting Requirements

The FCPA imposes strict accounting requirements on the Company. The FCPA requires the keeping of accurate books and records that, in reasonable detail, reflect the transactions and asset dispositions of the Company, and the development and maintenance of a system of internal

accounting controls including periodic audits. These requirements apply to all payments, not just sums that would be “material” in the traditional financial sense.

The following financial and accounting directives have been implemented to help ensure the Company’s compliance with the FCPA:

- All cash, bank accounts, investments and other assets of the Company must always be recorded accurately on the official books of the Company.
- The Finance Department will periodically review the Company’s books, records, and controls to ensure their compliance with the requirements of the FCPA.
- No employee shall falsify any accounting or other business record, and all employees shall respond truthfully and fully to any questions from the Company’s internal or independent auditors.
- Bank accounts should be opened or closed only upon the prior written approval of the Country Director, the Director of Accounting or Compliance Department. In the absence of either of those, the CFO and/or Corporate Controller would approve. Anonymous (“numbered”) accounts will not be maintained.
- Payments will not be made into anonymous bank accounts or other accounts not in the name of the payee or of any entity known to be controlled by the payee.
- No cash payments shall be made, except for regular, approved payroll payments or normal disbursements from petty cash supported by signed receipts or other appropriate documentation. Checks will not be drawn to the order of “cash,” “bearer” or similar designations.
- Fictitious invoices, over-invoices or other misleading documentation will not be used.
- Fictitious entities, sales, purchases, services, loans or financial arrangements will not be used.
- Check requests will be in writing and contain a complete explanation of the purpose and authority for the payment. The explanation will accompany all documents submitted during the issuing process and will be kept on file.
- All expenses relating to foreign business must be supported by reasonable written documentation.
- Payments to third parties will only be made in the country where a substantial portion of the related services are performed or the country from which the third party performing such services normally conducts business.
- Payments for any services rendered to the Company by a government official (including an officer of a foreign government-owned or controlled commercial enterprise), including honorarium payments and reimbursement of expenses, will be made solely to the foreign government agency or instrumentality employing the individual. Such payments will be made by check directly to the foreign government agency or instrumentality, or by wire to its named bank account within the foreign government agency’s or instrumentality’s country, or by wire through its duly authorized correspondent bank within the U.S.
- Receipts, whether in cash or checks, will be deposited promptly in a bank account of the Company. Any employee who suspects the possibility that a bribe, kickback or over-invoice is associated with a receipt or that an understanding exists that all or a portion of a receipt will be rebated, refunded or otherwise paid in contravention of the laws of any jurisdiction, will immediately report that suspicion in accordance with the reporting procedures addressed below under “Reporting Violations and Investigations.”
- Personal funds must not be used to accomplish what is otherwise prohibited by this policy.

Certifications

The following certification policies will be followed:

- A representative(s) of Andela, Inc. and any subsidiary thereof will prepare a report and certification, which will be submitted to the Compliance Department and Finance Department annually, with respect to all remuneration for hospitality and gifts made relating to such company's operations in foreign countries during that year.
- The CFO will also prepare a report and certification (if applicable), which will be submitted to the Audit Committee of the Board of Directors annually with respect to all remuneration for hospitality and gifts made relating to operations in foreign countries during that year.
- Key employees will submit an annual certification to the Compliance Department with respect to compliance with Applicable Corruption Laws and Company policy.

Training

The Company will conduct periodic anti-corruption training for all directors and officers, and, where appropriate, employees, agents and business partners. Failure to participate in such training may be cause for disciplinary action, up to and including termination of employment or termination of a third party's contract.

Accountability: Roles and Responsibilities

The roles and responsibilities regarding the Company's anti-corruption compliance are as follows:

- The Board of Directors has ultimate responsibility for ensuring that the Company meets its obligations under Applicable Corruption Laws.
- The Company's Compliance Department and Chief Financial Officer ("CFO") are responsible for administering the Company's compliance program, including:
 - Identifying and interpreting this policy, the FCPA and other anti-corruption laws, rules and standards.
 - Drafting related policies and procedures.
 - Advising Company personnel on any legal issues related to adherence to the Company's compliance program.
 - Coordinating anti-corruption education and training.
 - Administering the Company's Reporting and Reviewing resource for ethical and compliance issues at EC@Andela.com.
 - Administering the annual employee compliance certification program.
 - Administering the Company's due diligence program for third parties.
 - Investigating possible violations of the Company's compliance program.
 - Reporting to the Audit Committee and/or the Board of Directors any material violations of the Company's compliance program.
- The Corporate Controller is responsible for implementing and monitoring systems of internal controls and record keeping procedures that comply with the FCPA.
- The Finance Department is responsible for reviewing the adequacy of controls established to ensure compliance with policies and procedures.
- The MX Committee, chaired by the CEO and comprising senior management and other members from across the Company, shall provide a forum for considering important international compliance matters.
- Each director, officer, employee and agent is responsible for:
 - Complying with Company policy and Applicable Corruption Laws.
 - Participating in training as required by the Company.

- Reporting any red flags to the Compliance Department or Finance Department.

Reporting Violations

Any director, officer or employee who suspects a violation of this policy must immediately report such suspected violation to the Compliance Department, the Finance Department, and EC@Andela.com.

Online Resources

FCPA:

<https://www.justice.gov/criminal-fraud/foreign-corrupt-practices-act>

UKBA:

<http://www.legislation.gov.uk/ukpga/2010/23/contents>

Nigeria ICPC:

<http://icpc.gov.ng/>

Kenya EAC Commission:

<http://www.eacc.go.ke/>

Uganda IOG:

<https://www.igg.go.ug/>

Africa Union Convention:

<http://www.auinticorruption.org/auac/en>

Andela, Inc.

Policy Acknowledgement

I hereby acknowledge that I have received a copy of the Employee Handbook.

The employee handbook describes important information about Andela, and I understand that I should consult my manager or People & Culture regarding any questions not answered in the handbook. I have entered into my employment relationship with Andela voluntarily. Accordingly, either I or Andela can terminate the relationship at will, with or without cause, at any time for any lawful reason.

This handbook and policies and procedures contained herein serve as a supplement to existing policies and procedures. I understand that, except for employment-at-will status, any and all policies and practices may be changed at any time by Andela, and the Company reserves the right to change my hours, wages and working conditions at any time. All such changes will be communicated through official notices, and I understand that revised information may supersede, modify or eliminate existing policies.

I acknowledge that this handbook is not a contract of employment and all terms of individual employment contracts remain in full force and effect.

I have received the handbook, and I understand that it is my responsibility to read and comply with the policies contained in and referred to in this handbook and any revisions made to it and any Andela Policy that may be issued from time to time for the duration of my employment at Andela. Further, I acknowledge that I received and know the material covered during Andela's annual IT security awareness training delivered on September 21, 2017 and provided in the IT Policy and Security section detailed in this handbook.

I do hereby certify that I have received a copy of Andela's Anti-Corruption Policy, that I have read the Policy, that I understand the provisions of the Policy and that it is my responsibility to to comply with the provisions of Andela's Anti-Corruption Policy.

Employee's Signature

Employee's Name (Print)

Date

TO BE PLACED IN EMPLOYEE'S PERSONNEL FILE