Leapfrog Global Code of Conduct

Owner: Senior Manager, People Management

Effective from: 10 Jan 2025

At Leapfrog, our Global Code of Conduct is a reflection of our mission to **"Innovate Better, Faster"** and our purpose to amplify human potential while creating opportunities for people and businesses. It defines our core values, shared responsibilities, and global commitments, guiding us to act with **integrity, accountability, and respect** in every decision we make.

The Code provides clear expectations for ethical behavior, offers guidance on situations requiring attention, and highlights resources available to you when facing challenges. While it can't address every scenario, it serves as a foundation for **good judgment**—a value we rely on heavily at Leapfrog. Remember, each of us is responsible for our actions, and making an ethical choice is always the right choice.

Why the Code Matters

The Global Code of Conduct is Leapfrog's commitment to:

- **Integrity, Ethical Behavior, and Professionalism:** Ensuring transparency, respect, and accountability in all our interactions.
- **Consistency and Adaptability:** Maintaining global ethical standards while respecting the diversity and legal requirements of the countries where we operate.
- **Country-Specific Codes:** Providing a foundation to build localized codes and policies that align with local laws while staying true to Leapfrog's values.

We encourage you to review the entire Code carefully and refer to it whenever you have questions about ethical conduct. By understanding and adhering to the Code, we ensure that Leapfrog continues to foster a culture of innovation, trust, and excellence—wherever we work, now and in the future.

A message from CEO

At Leapfrog, we help imagine and create world-class software for both big companies and startups that strive to be big one day. Those customers *trust* us to work together and help them succeed. And hence our success as a business depends on trust built every day through the choices we make, the way we treat people, and how we carry ourselves as a company.

Our Code of Conduct is here to guide us in those daily choices and help us to stay true to what makes Leapfrog special. It reflects both what we stand for—our values that shape our culture—and how we work, ensuring we act with integrity and fairness in everything we do.

What We Stand For

Our values are the foundation of who we are and how we show up:

- **Customer Focus:** Everything we do is rooted in delivering value to our customers.
- **Accountable Freedom:** We trust our people to make decisions and take ownership of results, balanced with responsibility.
- **Be Remarkable:** We go above and beyond, aiming to exceed expectations and inspire excellence in others.
- **Celebrate Efforts:** Progress matters as much as results—we take time to recognize and appreciate the hard work along the way.
- **Embrace Openness:** Honesty, inclusivity, and transparency are at the heart of how we collaborate and grow.

These values aren't just words; they're what drive our culture and define how we approach our work and relationships. They set us apart.

How We Work

Doing business with integrity is non-negotiable. Here's what that looks like:

- **Ethical Practices:** We operate with honesty, follow the rules, and hold ourselves to the highest standards of business. We raise our hand when something isn't right.
- **Respect for Others**: Fairness and compassion guide how we treat customers, teammates, and partners alike.
- **Accountability:** We take ownership of our policies, and actions, and stay true to our commitments.

This Code isn't about making rules for the sake of it—it's about ensuring that everyone at Leapfrog feels *empowered* to make the right decisions, guided by shared principles and a commitment to doing the right thing.

As you go about your day-to-day work, I encourage you to lean on this Code. It's here to remind us of who we are, what we stand for, and how to take action.

Thank you for your commitment to living our values and keeping Leapfrog a company we're all proud to be part of.

Sincerely,
Chris Sprague
CEO

1. Living the Leapfrog Way: A Guide to Ethical Conduct

The Leapfrog Global Code of Conduct is a guiding framework for everyone—employees, contractors, customers, partners, and stakeholders—across all current and future locations where Leapfrog operates. Living the Code means taking ownership of our actions, making sound decisions, and seeking guidance when needed. It embodies our unwavering commitment to ethical practices, fostering trust, and strengthening relationships with our customers, teams, and communities.

Key Points:

- **Inclusive Applicability:** This Code applies to all business matters, interactions, and platforms globally, covering every location where Leapfrog operates now and in the future.
- **Establishing Standards:** It defines clear expectations for ethical and responsible behavior in all dealings—whether with teammates, customers, or partners.
- **Comprehensive Coverage:** Both personal and professional conduct are essential, ensuring that all actions contribute to a safe, positive, and respectful environment for everyone.

1.1 Is the Code all I need to know and follow?

No, the Code is just one part of your responsibilities. You must also be familiar with global, country, and area-specific policies relevant to your role. Always refer to these policies or consult your Team Manager or Country Leads if you have any questions.

1.2 Using the Code as a Guide

The Code of Conduct is not meant to replace open communication, feedback, or individual accountability. It is a foundation for making thoughtful, value-driven decisions. When you face challenges or uncertainties, use the Code as a starting point and seek input from others.

1.3 Shared Responsibility: Upholding the Code Together

Every Leapfrog team member has a role in maintaining our culture of integrity and accountability:

- **Know Your Role:** Understand the Code, relevant policies, and applicable laws that guide your work.
- **Act with Integrity:** Behave ethically and in alignment with Leapfrog's values, policies, and applicable laws.
- **Follow Customer Standards:** When working with customers, adhere to their Code of Conduct unless it conflicts with ours.
- **Speak Up:** Raise concerns when something doesn't feel right, and never retaliate against those who do.
- **Stay Compliant:** Complete all mandatory training if and when required and cooperate with investigations when needed.
- **Hold Yourself and Others Accountable:** Support a culture where everyone takes ownership of their actions.

1.4 Making Ethical Decisions

When faced with uncertainty, ask yourself the following questions to guide your actions:

- Is this action aligned with Leapfrog's mission and values?
- Is it permitted by the law or our policies?
- Would others see this action as fair and appropriate?
- Would I be comfortable if this action were made public?
- Does this action reflect the example I want to set for others?
- Could this action cause harm to Leapfrog, colleagues, customers, or the community?

If you answer "no" or "I don't know" to any of these questions, stop and seek advice. Speak with your Team manager, the People Management Lead, or your Country Lead to ensure you're making the best possible decision. Acting with integrity means knowing when to ask for help.

2. Our Mission and Values in Action

At Leapfrog, our mission and values drive who we are and how we operate—guiding us to innovate with purpose, act with integrity, and foster collaboration. By embracing our mission to "Innovate Better and Faster" and living our core values, we create meaningful global impact. We call on all Leapfroggers to embody these values in every interaction—whether with teammates, customers, or partners.

2.1 Mission and Vision Statement :

Our mission at Leapfrog is simple yet powerful: *"Innovate Better and Faster."* This drives every decision and action, pushing us to create meaningful global impact. Our vision, to be the *"Innovation Engine for Global Impact,"* reflects our commitment to discovering better solutions, making innovation a repeatable process, and improving lives through our work.

2.2 Values in Action :

At Leapfrog, our core values guide every decision, shaping our culture and driving us to excel with integrity and purpose. Here's what each value means and how we bring it to life:

2.2.1 Customer Focus

Our commitment is to deliver world-class innovation that genuinely serves our customers. At the core of everything we do is creating outstanding products and services that truly meet their needs.
How We Create It:

- **See Through Their Eyes**: Always consider the customer's perspective.
- **Actively Seek Feedback:** Continuously listen to customer input and adapt.
- **Go the Extra Mile:** Deliver memorable experiences that exceed expectations. We create products and services that truly serve our customers.

2.2.2 Accountable Freedom

We enjoy the freedom to make decisions but stay accountable for the results. We balance flexibility with responsibility, trusting ourselves and others to act with integrity.
How We Create It:

- Empower Choices: Trust employees to make responsible, value-driven decisions.

- Foster Ownership: Encourage everyone to take full accountability for their work.
- Provide Support: Offer guidance while promoting independence.

2.2.3 Be Remarkable

We push ourselves to reach new heights and continuously improve. Our passion for learning and growth inspires us to be better every day.
How We Create It:

- Pursue Excellence: Always strive for innovation and improvement.
- Lead by Example: Inspire others through leadership and action.
- Embrace Learning: Foster a culture of curiosity, growth, and learning from failures.

2.2.4 Celebrate Efforts

We value and honor our teams' collective effort. Recognizing achievements, big and small, keeps us motivated and reinforces our commitment to each other.
How We Create It:

- Acknowledge Contributions: Celebrate every milestone and success.
- Promote Team Wins: Create a culture where collective achievements are shared.
- Reward Success: Provide meaningful rewards and recognition. We value every effort and achievement—big or small.

2.2.5 Embrace Openness

We build trust through transparency and honest communication.
How We Create It:

- Promote Transparency: Share information openly across Leapfrog.
- Encourage Honest Dialogue: Provide safe spaces for feedback and discussions.
- Tackle Challenges Together: Face difficulties head-on with honesty and collaboration.

These values are the heart of our Global Code of Conduct—helping us succeed while building an inclusive, ethical, and vibrant Leapfrog culture.

3. Responsibility and Conduct

At Leapfrog, we hold ourselves to the highest standards of ethical behavior, integrity, and accountability. As "Leapfroggers," each employee is expected to lead by example, promote openness, and uphold the values that define our company. Whether it's ensuring smooth transitions during departures, adhering to attendance guidelines, or fostering a culture of

respect and compliance, we are all responsible for maintaining the trust and excellence that our global customers and stakeholders expect from us.

3.1 Responsibilities as Leapfroggers

3.1.1 I Lead by Example

Every Leapfrogger is expected to act ethically, lead with integrity, and embody our values:

- **Be a Role Model:** Demonstrate ethical behavior in every interaction.
- **Encourage Openness:** Create an environment where concerns can be raised freely.
- **Communicate Positively:** Reinforce our commitment to ethics, compliance, and the values that define Leapfrog.

3.1.2 Attendance and Worklog

At Leapfrog, attendance reflects our commitment to accountability and excellence. We expect all employees to adhere to the following, in alignment with their country and area-specific procedures and policies:

- Start shifts on time and record attendance using the designated tools.
- Submit work logs promptly to avoid being marked as Leave Without Pay (LWOP), following the applicable guidelines.
- Obtain prior approval for any absences to avoid disciplinary action, including potential pay adjustments, as per local protocols.

Employees are expected to comply with hybrid work procedures as outlined in their respective country's operational guidelines.

Q: I am asked to work in a few overlapping hours coinciding with the United States. However, I prefer working from 9 am to 6 pm. Can I let the customer know?

A: As Leapfrog is a global company with customers primarily in the US, it's expected that our employees work overlapping hours to facilitate effective communication. Speak with your Team Manager about your concerns regarding the schedule and discuss why you prefer not to work beyond your regular hours. **Avoid directly approaching the customer.** It is important to find a solution that works for both you and the company, ensuring that our customer relationships remain strong and professional.

3.1.3 Notice Period and Departure Guidelines

Leapfrog values operational excellence and fulfilling our commitments to customers and stakeholders. To ensure smooth transitions, employees are required to provide a **4 to 8-week**

notice period upon departure, depending on their role. Senior leadership roles may require a longer handover period based on country-specific policies.

Please check your local requirements to confirm the exact notice period for your role. This transition helps us maintain continuity and uphold the high standards our stakeholders rely on.

3.2 Expected Behavior

We expect the highest standards of conduct from all employees and representatives. Your behavior should reflect our values and maintain Leapfrog's reputation.

Q: Can I share information about layoffs at LF if I'm not sure it's true?

A: No. Sharing unverified information, like rumors about layoffs, can harm the team and LF's reputation. If in doubt, check with your Team Manager or People Management instead of speculating.

4. Raising Concern

Leapfrog promotes a culture of integrity, respect, and professionalism. All Leapfroggers are expected to uphold these values in interactions with colleagues, customers, and partners. We encourage reporting misconduct or violations through direct communication or our confidential Speak Up channels, ensuring fair action and a safe, ethical workplace. Speak up without fear of retaliation, either directly or via our Speak Up channels, to address concerns.

Examples of issues to report:

- Discrimination or harassment
- Fraud or financial misconduct
- Safety violations or risks
- Breach of company policies or legal regulations
- Any behavior that contradicts Leapfrog's values and ethical standards

4.1 Local Speak-Up Channels

If you feel comfortable addressing the issue within your immediate circle, you are encouraged to raise your concerns directly with one of the following:

- Your Team Manager
- A representative from People Management
- Your Country Lead

You can use your country's Speak Up platform to report concerns or provide feedback. Country leaders will ensure transparent resolution and share periodic updates with global leaders,

including the CEO, to uphold accountability and company principles.

4.2 Global Speak Up Channels

If you believe that speaking up with your country platform isn't a viable option, you can use the following Global channels to report concerns anonymously or non-anonymously.

4.3.1 [Harassment Reporting form-Global:](#)

Use this form to report incidents of discrimination you've **faced or witnessed** or Harassment of any kind

This reporting mechanism is specifically designed to handle sensitive issues involving discrimination and harassment. All reports submitted through this channel are reviewed and addressed by the Board of Directors, which includes the CEO.

4.3.2 [Whistleblower Form - Report Anonymously and Safely](#)

This form is dedicated to addressing a broader range of concerns, including but not limited to:

- Ethical violations or breaches of company standards
- Retaliation concerns or issues involving whistleblower protection
- Financial and accounting irregularities
- Breaches of confidentiality
- Data protection issues
- Any incidents or practices that could affect Leapfrog's reputation, data security, or compliance
- General concerns or suggestions you believe should be brought to the attention of global leadership

All Whistleblower submissions will be reviewed by senior leaders, including the Board, CEO, and relevant global leads. Legal consultations will be made if needed to ensure proper resolution. These channels ensure privacy, impartiality, and reinforce Leapfrog's commitment to ethics, compliance, and a healthy workplace.

4.3 Investigation Process for Global Speak Up Channels:

1. **Receipt:** Concerns are received via Global Speak Up channels.
2. **Screening**: The severity of the concern is assessed, along with any conflicts of interest, to determine if a Global investigation is necessary based on the Code of Conduct, policies, and laws.

- If no Global investigation is required, the concern is handled by the Country Lead and People Management Lead.
- If a Global investigation is needed, a formal process is initiated.

3. **Investigator Assignment:** The Board of Directors assigns an investigation team or, if necessary, an independent team, ensuring impartiality.

4. **Investigation Procedures:**

   a. Interviews: Relevant individuals are interviewed.

   b. Evidence Review: Documents and evidence are examined.

   c. Substantiation: The investigator determines if the allegations are substantiated.

5. **Communication**: Regular updates on the investigation's progress are provided.

6. **Corrective Actions:** Based on the findings, Leapfrog may implement training, policy changes, or disciplinary actions.

7. **Closure:** The case resolution is communicated to the involved parties.

Leapfrog is committed to confidentiality and protecting individuals from retaliation for good-faith reports. If you experience retaliation, please report it immediately. False or dishonest reports may result in consequences. For more details, please refer to the [Information Security Policy](#)

5. Consequences of Violating the Code of Conduct

Leapfrog reserves the right to terminate employment if actions harm the company's interests or violate policies. Examples include:

- Breach of the Code of Conduct
- Violating confidentiality agreements
- Damaging the reputation of Leapfrog or our customers
- Theft or property damage
- Harassment, or discrimination
- Falsifying records
- Substance abuse during office hours
- Criminal conviction or felony charges
- Unapproved or excessive absenteeism

6. Customer Focus: Dedicated to Serving Our Customers

"Customer Focus" is more than a value; it's a daily commitment. As ambassadors of our brand, our interactions with customers reflect who we are.

6.1 Representing Leapfrog Values

Every interaction you have with current or potential customers is an opportunity to embody the values that define Leapfrog. Our reputation is one of our most valuable assets, and through our actions, we preserve and enhance the goodwill that our company enjoys. Whether you're dealing with customers, suppliers, or partners, remember that your conduct represents Leapfrog's commitment to excellence and ethical behavior.

6.2 Fair Dealings

We believe in fairness and integrity. In every interaction—whether with customers, suppliers, partners, service providers, or competitors—Leapfroggers must act fairly and transparently. We do not take unfair advantage of anyone through manipulation, concealment, or misrepresentation. Instead, we foster trust by dealing honestly and ethically in all our business practices.

6.3 Confidential Information of Customers and Third Parties

Confidentiality is essential to our work. As Leapfroggers, we manage sensitive customer and third-party information, which must be protected in line with our data management policy and secure development policy. This data must be handled responsibly and never disclosed without proper authorization. Personal and proprietary information cannot be used for personal benefit or third-party advantage. We are dedicated to safeguarding all information through appropriate technical and organizational measures, ensuring compliance with legal and contractual obligations. No data may be processed or disclosed without written consent or legal requirement, and all Leapfrog employees, agents, and contractors are responsible for upholding these standards.

7. Building a Workplace Rooted in Respect and Inclusion

At Leapfrog, respect is the cornerstone of our commitment to creating a diverse, inclusive, and safe workplace. We empower all employees to be their authentic selves, contributing, growing, and succeeding in an environment where everyone feels valued and respected. Our commitment to treating others with kindness and dignity ensures that all individuals, regardless of role, seniority, or background, have the opportunity to thrive.

We are dedicated to maintaining a workplace free from discrimination and harassment, where equal opportunities for success are available to all.

7.1 Championing Equality and Diversity

We are committed to fostering a workplace rooted in fairness and inclusivity, ensuring equal opportunities for all individuals. Our practices embrace and respect differences in race, color, religion, disability, gender, national origin, sexual orientation, gender identity, gender expression, age, genetic information, military status, and other characteristics protected by law. These principles are integral to creating an environment where everyone can thrive and feel valued.

7.2 Zero Tolerance for Harassment and Discrimination:

Leapfrog maintains a strict zero-tolerance stance against all forms of harassment and discrimination, whether verbal, physical, or visual. We take any actions that compromise the respect, dignity, or safety of individuals seriously, including offensive jokes, inappropriate comments, and bullying. This applies equally to in-person interactions and digital platforms like company communication channels. Employees are encouraged to report any instances of harassment through appropriate channels, which will be addressed confidentially and promptly, ensuring all employees can perform their work free from fear or bias.

Examples of unacceptable behavior but not limited to:

- Using offensive or derogatory language in company communication channels such as Slack, email, or any other communication platform.
- Discriminating or making harmful comments based on someone's gender, seniority, or other personal characteristics.
- Engaging in bullying or any behavior that makes a colleague uncomfortable, especially related to sexual harassment.

Q: I feel that I am a victim of harassment/sexual harassment. However, I am afraid that if I report this to the company, I may lose my job. Please advise.

A: Leapfrog has zero tolerance for harassment, and we encourage you to speak up if you are facing such issues. You can report the matter to your supervisor or the Head of People Management Representative, and your complaint will be handled with confidentiality. Rest assured, there will be no retaliation, and the company will take appropriate action to ensure a safe and respectful workplace.

Q: How should I handle a situation where a customer uses offensive language during a meeting or communication?

A:If a client uses offensive language, stay calm and do not lose your composure. Acknowledge the behavior and respond without being confrontational with something like, "I understand the frustration, but I'd appreciate it if we could keep the discussion respectful." and try to shift the focus back to the topic. If the language and tone continues, propose a next suitable time for the discussion. You can consider sending a follow-up email summarizing the meeting and reinforce

professional expectations if needed. Please escalate to your Account Manager and Team Manager. Do not hesitate to inform the People Management Representative if needed. Leapfrog takes these matters seriously and will take the necessary steps to ensure a safe and respectful work environment.

Q: Can in-person interactions also be considered in the context of harassment and discrimination?
A: Yes, in-person interactions are equally important. Examples include offensive comments, unwanted physical contact, inappropriate jokes, or isolating someone based on personal characteristics. Such behavior is unacceptable and treated as seriously as digital harassment. Leapfrog ensures all reports are confidential, and retaliation will not be tolerated, fostering a safe and respectful workplace for everyone.

7.3 Wellness and Support Services for Employees

To support our employees, we provide a range of resources, including Employee Assistance Programs like counseling, and mediation services. Our confidential channels, such as Speak Up channels are always available for reporting concerns, ensuring that every voice is heard.

7.4 Ensuring a Drug-Free and Weapon-Free Workplace

We are dedicated to maintaining a safe and secure work environment. Clear standards prohibit the use, distribution, or possession of drugs, alcohol, weapons, firearms, or ammunition, except where authorized for security personnel. We encourage employees to report any unsafe conditions or behaviors through the appropriate channels to ensure a secure workplace for all.

7.5 Commitment to Equal Opportunity

Leapfrog is committed to creating an inclusive environment where every employee and candidate has equal access to opportunities for success. We base all talent-related decisions—whether hiring, promotions, compensation, or professional development—on individual merit, performance, and potential, ensuring fairness, inclusivity, and transparency at every step.

7.5.1 Hiring Decisions:

In our recruitment process, we prioritize fairness and equality by focusing on candidates' skills, experience, and potential, rather than personal characteristics. We are committed to offering equal opportunities to all, regardless of race, gender, age, or other protected traits, reflecting our unwavering commitment to inclusivity and equal opportunity.

7.5.2 People Growth and Development

We support equal opportunity for growth by providing continuous learning through training and development programs. The Annual Employee Performance Appraisal (AEPA) process ensures fairness and objectivity in evaluating employees, guiding decisions on salary, bonuses, and career advancement, with equal opportunities for all employees to grow and succeed.

7.5.3 Compensation and Benefits:

Our approach to compensation and benefits is rooted in equal opportunity, ensuring all employees receive fair and transparent evaluations. Through the AEPA process, we guarantee that decisions regarding salary, bonuses, and career progression are based on merit and performance, upholding our commitment to fairness and inclusivity.

8. Protecting Company Assets and Confidential Information

Integrity, accountability, and excellence are the foundation of our culture. Protecting company assets and confidential information is essential to our culture, guided by the [Information Security Policy](#), and [Asset Management Policy](#). These values shape who we are and guide our daily actions.

8.1 Company Confidential Information

Confidential information is one of Leapfrog's most valuable assets. It includes all non-public information and personal data that we obtain during business operations. Protecting this information is a shared responsibility that extends to every director, employee, agent, third-party consultant, and customer associated with Leapfrog.

8.1.1 How do we protect confidential information?

- **Use with Purpose:** Confidential information must only be used for business purposes and handled per policies and privacy laws.
- **Confidentiality Agreement:** All employees sign a Nondisclosure Agreement to protect company information. We must ensure confidentiality is maintained and information is not disclosed without authorization.
- **Respect and Integrity:** Unauthorized sharing of confidential information, including customer or company details, is prohibited, even after leaving the company.

Q1: What if someone uses LF's software code or works with LF customers after leaving the company?
A: Using LF's software or customer connections for personal gain is a violation of our policies and can result in legal action. We expect all team members to respect confidentiality even after leaving.

Q2: Can I share details about new LF projects with people outside the company or colleagues?

A: No. If information hasn't been made public, it should not be shared. Always check with your Team Manager or Country Lead if you're unsure.

8.2 Protecting Intellectual Property

Leapfrog's IP—such as copyrights, patents, trade secrets, and other proprietary assets—is a cornerstone of our commitment to innovation. Equally important is respecting and safeguarding the intellectual property (IP) of our customers. This includes but is not limited to business plans, trade secrets, business-related documents, design files, architecture diagrams, and any other customer-provided files or information. Protecting these assets is guided by [Data Management Policy](#), [Information Security Policy](#)

8.2.1 How do we protect intellectual property?

- **Assignment of Rights:** Any IP created using company resources belongs to Leapfrog. Employees must report inventions for legal protection.
- **Use with Care:** Our IP must be safeguarded from unauthorized use. Contact the Security and Compliance Team with any concerns (securitypod@lftechnology.com)

Q: Why shouldn't I use Leapfrog's software code for personal projects?

A: Using Leapfrog's code for personal projects is unethical and illegal, as it's protected by intellectual property rights. It undermines trust, damages the company's growth, and goes against the responsible use of company resources.

8.3 Adhering to Data Privacy Regulations

Leapfrog is committed to following data protection laws, ensuring personal data is collected, processed, and stored securely as outlined in the [Access Control](#) Policy, [Data Management Policy](#)

Q: Can I work immediately with Leapfrog's customers outside the company after leaving?

A: No. Building relationships with our customers takes effort and trust. Directly working with Leapfrog's customers outside the company after leaving disrupts these relationships and can harm Leapfrog's business. It's crucial to honor the professional boundaries and agreements established during your time here.

8.4 Media Relations and Public Communication

To ensure that accurate information is shared with the public and to protect our confidential information, only designated Leapfrog representatives are authorized to communicate with the

media as mentioned in the [Access](#)Control and [Data Management Policy.](#)

8.4.1 How do we handle media relations?

- **Corporate Communications**: Direct all media inquiries to the Country Lead
- **Responsible Communication**: We must not post or discuss company business on the Internet unless authorized. Remember that online posts are permanent, so consider the potential impact on Leapfrog before sharing any information publicly.
- **Public Events and Communication**: Participating in events as speakers, judges, or attendees often involves answering questions about Leapfrog. While engaging, ensure responses are professional, and accurate, and avoid disclosing sensitive or confidential information. If in doubt, refer to your team lead or guidelines like the Design team's communication standards for support.

Inappropriate communications, even on personal time and resources, may lead to corrective action up to and including immediate termination.

Q: Someone contacted me after a press release to learn more about the company. What can I share?

A: Be cautious when responding. It's fine to thank them if they're offering congratulations, but avoid sharing sensitive or confidential information, including customer details, unless authorized. Report any suspicious inquiries to your Country Lead to protect company information

8.5 Physical Access Control

Leapfrog has implemented physical access control procedures to ensure the security of our communications, protect our assets, and maintain privacy as mentioned in [Information Security](#)and [the physical security policy](#) Employees are responsible for complying with these security measures and must not circumvent them.

8.5.1 How do we ensure physical security?

- **Security Compliance**: Adherence to Leapfrog's Information Security Policy is mandatory. Employees are responsible for preventing unauthorized access to company resources by using ID badges, passwords, and other security measures.

8.6 Use of Company Assets

Leapfrog's assets, including information technology, intellectual property, facilities, equipment, and cash, are intended for business purposes as mentioned in the [Asset Management Policy.](#) Personal use of these assets should be minimal and must not interfere with work duties or violate any laws or company policies.

- **Business-Only Use:** Company resources must be used for legitimate business purposes.
- **Protection of Resources:** Safeguard company assets and avoid unauthorized use of software or materials.

8.7 Expense Claims

Leapfrog has clear policies regarding business expenses and reimbursements. All business-related expenses must be authorized by a manager before being incurred, and personal expenses will not be reimbursed as mentioned in [Third-Party Management Policy.](#)

9. Conduct our business with integrity

Integrity: The Foundation of Our Innovation

Honesty, fairness, and ethical behavior are the pillars of our success. These principles guide every decision and action, ensuring that we uphold the highest standards in both intention and execution.

By staying committed to these values, we build trust with customers, partners, and employees, fostering a culture of innovation and excellence.

9.1 Avoiding Conflicts of Interest

At Leapfrog, integrity means prioritizing the company's interests above personal gains. As per our [Conflict of Interest Policy,](#) avoid situations where personal or family interests conflict with professional responsibilities. Always disclose and manage potential conflicts transparently to uphold our culture of openness and accountability.

For questions, contact the People Management Lead or your Country Lead. Remember, conflicts of interest must be disclosed as they violate this Code and our Conflict of Interest Policy.

Examples of Conflicts of Interest:

Q: Is it a conflict of interest if I have a romantic relationship with someone I'm evaluating?

A: Yes, it is. Engaging in romantic relationships with appraisees can create bias in performance evaluations, making it difficult to remain impartial. This could affect decisions about promotions, raises, or career growth. It's important to disclose such relationships to maintain transparency and avoid conflicts of interest.

Q: What if I work at Leapfrog and another company at the same time—does that create a conflict of interest?

A: Yes, it can. Working for another company, especially if it competes with Leapfrog or has a business relationship with us, could create a conflict of interest. Additionally, holding another job could breach the working hours agreed upon in your Leapfrog contract, impacting your availability and the quality of your work.

Q: Can I hire someone I personally know really well?

A: While it's great to have a network of talented individuals, we want to make sure that hiring decisions at Leapfrog are based on merit and are free from personal bias. If you're considering recommending or hiring someone you know closely, it's important to be transparent about the relationship and ensure the decision aligns with our hiring principles.

9.2 Political Activities

Leapfrog strictly prohibits the use of company funds, assets, or resources, including communication platforms like Slack, email, or social media, for political campaigns unless explicit prior approval is obtained. Employees are encouraged to engage in personal political activities outside of work but must ensure their actions do not imply Leapfrog's endorsement or misuse company resources in any way.

9.3 Lobbying

When engaging with government officials, ensure you represent Leapfrog only if explicitly authorized. Any interactions with government representatives must align with Leapfrog's Global Code of Conduct, adhering to the highest standards of ethics and transparency. Conduct such activities responsibly and with integrity.

9.4 Money Laundering and Terrorism Financing

Any involvement in money laundering or terrorism financing is strictly prohibited. It is essential to report any suspicious activity to your manager or through the Speak Up channels. Adherence to these guidelines ensures compliance with our commitment to maintaining integrity and preventing financial crimes.

9.5 Immigration

When traveling for business, it's important to adhere to both local immigration laws and your company's guidelines. Ensure that all required documents, permits, and approvals are in place before departure. If you have any questions or need clarification, reach out to your Country Lead for support. Always act in compliance with regulations to maintain the integrity of our global operations.

9.6 Misuse of Opportunities

At Leapfrog, Employees must use company information solely for business purposes, and not for personal gain or to benefit others. This obligation continues even after leaving the company, ensuring that former employees do not exploit company information for personal or competitive advantage.

9.7 Anti-Corruption and Anti-Bribery

Leapfrog upholds the highest standards of integrity, firmly prohibiting any form of bribery or corruption. This includes offering or accepting bribes, kickbacks, or facilitation payments, as well as any actions by third parties on our behalf that may involve such practices.

9.7.1 Prevention of Corruption

We do not offer gifts, entertainment, or any items of value to government officials or business partners to influence decisions or gain an unfair advantage. This includes bribes, kickbacks, and facilitation payments.

Q: One of the vendors we work with for sourcing prospective candidates gives me a gift that seems to be of very high value. Can I accept the same?

A: Gifts from vendors are a common practice, especially during the festive season. However, Leapfrog adheres to ethical standards regarding gift acceptance. If the gift seems unusually high in value, politely inform the vendor that you cannot accept such a gift. Always ensure that such gifts align with Leapfrog's Anti-Corruption and Anti-Bribery policies and avoid any conflicts of interest.

9.8 Charitable Contributions

Charitable giving is an important part of our corporate responsibility, aligned with our mission and values. We support causes like education, social welfare, and disaster relief, ensuring donations go to recognized, tax-compliant organizations and comply with local laws. Contributions are never made to individuals or entities tied to our directors and are transparently recorded.

Our Global Code of Conduct ensures that donations are free of any improper influence or expectation of business return, and are fully documented to maintain integrity.

9.9 Transacting with Third Parties

The Third-Party Management Policy applies to all business-critical data and systems at Leapfrog, including external parties like consultants and vendors who have access to our resources.

We ensure:

- **Due Diligence:** Verifying third-party credibility.
- **Contracts:** Ensuring compliance with anti-corruption laws.
- **Compliance:** Meeting all legal and internal standards.
- **Supplier Code of Conduct:** Upholding our values.

We track all payments to ensure legality, accuracy, and ethical integrity.

10. Environmental and Social Responsibility

Leapfrog is committed to fostering sustainability, ethical practices, and positive community impact through responsible actions across all our operations.

10.1 Our Commitment to Sustainability

Sustainability is core to Leapfrog's mission. We strive to minimize our environmental footprint by adopting eco-friendly practices in all operations. This commitment drives our innovations, ensuring a better future for all.

10.2 Ethical Sourcing and Procurement

We maintain integrity in sourcing by working with suppliers who align with our values, ensuring responsible and sustainable practices. Signed agreements with all vendors reinforce our commitment to mutual accountability and compliance.

10.3 Supporting Community Engagement and Social Impact

Leapfrog is dedicated to positively impacting communities, focusing on education, technology access, and social well-being. We encourage employee involvement in volunteer work, celebrating their contributions to a better world. These efforts support a sustainable, socially responsible future.

11. Records, Disclosures, and Audits

Leapfrog upholds the integrity of our financial records, ensuring accurate transactions to maintain trust with customers, and employees. Employees involved in financial reporting must comply with relevant laws, standards, and company policies.

We are committed to transparent, accurate public disclosures and adhere to strict internal procedures. Full cooperation with external auditors is required, and all interactions with regulators and law enforcement must be truthful and guided by the country leader. In cases of litigation or investigation, the Legal Department may impose a legal hold on relevant records. Compliance with these directives is mandatory.

12. Administering Our Code

Security and Compliance, and People Management Leads oversee our Code of Conduct, ensuring it aligns with our mission and values. They report directly to the CEO upholding our commitment to integrity across operations.

12.1 Investigations

We have a process in place to thoroughly review and investigate any potential legal or Code violations. These investigations are handled with respect, fairness, and confidentiality. If an allegation is proven, the CoC administering team will review the findings and decide the outcome.

At Leapfrog, we protect those who act with integrity. If you report a violation in good faith, the Company will fully support you. This protection also applies to those assisting in investigations. You can raise concerns without fear of retaliation, and any such actions can be reported through our established speak-up channels.

12.2 Amendments/Modifications to Our Code

The Code of Conduct is a dynamic document updated to reflect our ethical commitment. Approved by the Board of Directors and effective since Jan 10 2025 it is reviewed annually to stay current with legal, regulatory, or business changes.

12.3 Understanding and Commitment to the Code of Conduct

All employees and Board members must read and fully understand the Code of Conduct. As an integral part of how we operate, it is essential for Leapfroggers worldwide—regardless of location—to understand and implement the guidelines outlined in the Code.

12.4 Waivers

Waivers of the Code require written approval from the CEO and or Board of Directors or its committees. Waivers will be disclosed as required by law to maintain our transparency and integrity.

Revision History

Version	Date	Description	Author	Approved by
1.0	28-Jun-2023	First Version	People Operations	Principle Officer,

			Team	People Management
1.1	01 Aug 2024	Second Version: • Added Attendance, Social Media Policy, Notice Period, and Performance Evaluation in Accepted and Expected Behavior. • Added the accountability in training initiatives in Responsibilities of Leapfroggers. Updated names and specifics in the Reporting Procedure.	People Management	Senior Manager, People Managment

		• Added People Management's role in the Responsibility section. • Updated relevant links.		
1.2	12 Aug 2024	• Added Annual Employee Performance Appraisal (AEPA) section	People Management	Senior Manager, People Management
1.3	12 Sep 2024	• Paraphrased	People Management	Compliance Officer
1.4	Jan 10, 2025	Third Version: Fully upgraded the Code of Conduct to be applicable globally.	People Management	VP of Engineering