

# LIFESTRAW

# CODE OF CONDUCT

2021

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# LIFESTRAW CODE OF CONDUCT

## A MESSAGE FROM OUR CEO

LifeStraw Sàrl, including its affiliates, Vestergaard Frandsen East Africa Ltd. and Vestergaard Frandsen, Inc. (collectively, "LifeStraw") is built on the foundation of humanitarian entrepreneurship, that doing good is good for business. We innovate and design products that improve the health and quality of people's lives around the world. And our commitment to do good extends far beyond our products. We believe our actions as a company and as individuals have impact on people and planet and we recognize that our obligation to make change extends beyond delivering a product to a customer.

The LifeStraw Code of Conduct defines our standards and expectations for ethical, respectful, safe and healthy working conditions and environmental responsibility through our product design and manufacturing processes, our safe water programs, our operations and our daily business practices.

Our Code provides our directors, leadership, and employees with the policies that govern our global business and the tools necessary to make sound business decisions. It is more than a list of rules. The Code reflects our belief that doing the right thing and leading with integrity are essential to success.

Our Code is based on the UN Global Compact principles derived from the Universal Declaration of Human Rights, the International Labor Organization's Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, the Ethical Trading Initiative Base Code and the United Nations Convention Against Corruption. We build on these principles to further outline our deep commitment to climate, fair trade and diversity, equity and inclusion.

We at LifeStraw hold ourselves to these standards and expect our vendors, suppliers and partners to do the same to ensure that our products are made, and programs are implemented, with the utmost respect to the people we work with and the communities we work in.

We are committed to raising the bar for ourselves and our suppliers each year; to continuing to improve our impact; to using more sustainable materials and processes; and to doing better. We believe in transparency, reporting and tracking to ensure ongoing compliance. We recognize that open communication and listening to the needs of our team and our partners requires a collaborative approach, investing in training to build capacity and implementing systems to measure and drive meaningful change.

If you have questions about the areas covered in the Code, please talk to your supervisor, Human Resources ([hr@lifestraw.com](mailto:hr@lifestraw.com)) or the Legal Department ([legal@lifestraw.com](mailto:legal@lifestraw.com)).

Thank you.

Alison Hill

# LIFESTRAW PRINCIPLES

LifeStraw continuously strives to do business with social responsibility and integrity. These values have been and will continue to be its core guiding principles:

**Marketplace:** LifeStraw is committed to conducting its business with integrity, honesty, fair dealing and in full compliance with all applicable laws.

**Workplace:** LifeStraw is committed to supporting and increasing the diversity and inclusiveness of our workplace including on issues of race, sexual orientation, religion, age, gender, disability status or any other dimension of diversity.

**Environment:** LifeStraw is committed to mitigating the environmental impact caused by its manufacturing, operations and logistics through a program of environmental sustainability best practices aimed at reducing the consumption of resources, proper waste management and carbon neutrality.

**Community:** LifeStraw believes sustainable, community-based projects are integral to what we must do to the benefit the countries in which we operate.

We fully support and uphold the United Nations (UN) Global Compact framework and Principles as found [here](#).

LifeStraw also expects its business partners such as suppliers, consultants, service providers, agents, distributors, contract manufacturers, and other third parties in general to uphold **similar standards** to the ones outlined in this Code and aspires to do business only with third parties who therefore have a reputation for integrity.

While it is not possible to cover every given situation that may cause a violation of the principles outlined in the Code or the legislation in the countries where LifeStraw conducts business, each person must use common sense and good judgment to assess and identify non-compliant activities or behaviors.

## THE UN GLOBAL COMPACT

Corporate sustainability starts with a company’s value system and a principles-based approach to doing business. This means operating in ways that, at a minimum, meet fundamental responsibilities in the areas of human rights, labor, environment and anti-corruption. Responsible businesses enact the same values and principles wherever they have a presence and know that good practices in one area do not offset harm in another.

By incorporating the Ten Principles of the UN Global Compact (described below) into strategies, implementing policies and procedures and establishing a culture of integrity, we believe we are not only upholding our basic responsibilities to people and planet, but also setting the stage for long-term success.

The Ten Principles of the UN Global Compact are derived from: the Universal Declaration of Human Rights, the International Labor Organization’s Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development and the UN Convention against Corruption. Below is a description of the Ten Principles grouped by Area.

Area	Principle	Description
Human Rights	Principle 1	Businesses should support and respect the protection of internationally proclaimed human rights.
	Principle 2	Make sure that they are not complicit in human rights abuses.
Labor	Principle 3	Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.
	Principle 4	Elimination of all forms of forced and compulsory labor.
	Principle 5	Effective abolition of child labor.
	Principle 6	Elimination of discrimination in respect of employment and occupation.
Environment	Principle 7	Businesses should support a precautionary approach to environmental challenges.
	Principle 8	Undertake initiatives to promote greater environmental responsibility.
	Principle 9	Encourage the development and diffusion of environmentally friendly technologies.
Anti-Corruption	Principle 10	Businesses should work against corruption in all its forms, including extortion and bribery.

## COMPLYING WITH THE CODE

### Employees and contracted personnel

The LifeStraw Code of Conduct applies to:

- All employees working in LifeStraw and all LifeStraw board members; and
- Contracted personnel working for LifeStraw.

### Business Partners

The LifeStraw Code of Conduct also applies to:

- Suppliers, consultants, service providers, agents, representatives, distributors, contract manufacturers, and other third parties in general, who have agreed and signed a contract with LifeStraw.

In addition, we expect that our business partners respect and adhere to the following protocols:

- Communicate our ethical standards at least to their first-tier suppliers.
- Follow regular compliance training.
- Operate in accordance with legal country-specific minimum wage level and working time regulations in the countries where they operate or are present.
- Obtain and keep up-to-date required permits, licenses and registrations to operate in accordance with applicable local laws.

**Employees and contracted personnel** need to fully adhere to the Code.

**Our partners** need to adopt similar standards to the ones in the Code.

**LifeStraw** must only do business with reputable third parties.

# DOING BUSINESS WITH INTEGRITY

## FAIR DEALING

We have business dealings of many kinds with organizations and individuals all over the world. In conducting our business, we expect our employees to act in a manner that is not misleading or deceptive when dealing with customers, suppliers, competitors, government officials and other third parties. You should never take unfair advantage of anyone through manipulation, concealment or abuse of privileged information, and you should promptly correct anything that seems to be misunderstood.

We expect our employees to comply with both the letter and the spirit of all laws, rules and regulations where we conduct business. Failure by any employee to comply with these laws and regulations, the Code or any other company policy may result in disciplinary action, up to and including termination of employment. If you have any questions about whether a particular action is appropriate, please consult your supervisor or the Legal Department ([legal@lifestraw.com](mailto:legal@lifestraw.com)).

## ANTI-COMPETITIVE CONDUCT

"Antitrust" and "competition" laws are intended to promote competition in the marketplace for the benefit of consumers. LifeStraw and its employees should always conduct business in compliance with the letter and spirit of these laws. These laws target the following anti-competitive practices:

- Agreements between competitors (a) to set prices or terms; (b) to allocate markets, customers or territories; or (c) to not do business with ("boycott") certain suppliers or customers;
- Agreements between manufacturers and distributors that the distributors may sell only in certain territories or to certain types of customers;
- Agreements between suppliers and customers to (a) set resale prices; (b) require a customer to buy all of its requirements from one supplier; or (c) "tie" a customer's purchase of a desirable product / service to the purchase of a less desirable product / service; and
- Certain predatory practices by companies with monopoly power in their markets.

## SANCTIONS AND TRADE EMBARGOES

Governments use economic sanctions and trade embargoes for reasons of foreign policy and national security. The targets of sanctions or embargoes may be (1) foreign countries, (2) political organizations, or (3) particular foreign individuals and entities, such as narcotics traffickers or terrorists.

The sanctions generally involve the freezing or blocking of assets of these countries, organizations or individuals, barring trade or certain types of commercial transactions, or a combination of these actions.

LifeStraw is required to comply fully with all sanctions and trade-embargo programs where we do business. The penalties for noncompliance with these programs can be steep.

You should be on alert whenever you are involved in dealings with individuals or entities based in any country other than the United States. We use an internal compliance process as well as a third-party vendor to conduct due diligence for all foreign parties. All work with other countries should be routed to your supervisor and the Legal Department ([legal@lifestraw.com](mailto:legal@lifestraw.com)) prior to commencing work with the potential collaborator.

# CREATING THE RIGHT WORKPLACE

## DIVERSITY AND INCLUSION

An inclusive and diverse work environment is a deliberate business priority for LifeStraw and is a fundamental guiding philosophy to wherever we operate and across every part of our company. Respect for diversity, inclusion, equity and individuality is a fundamental part of (a) living our mission, vision and values, (b) maintaining a respectful and productive work environment, and (c) serving a diverse, global customer base. Our Diversity and Inclusion Policy is located [here](#), and it applies to LifeStraw employees, our marketing conduct as well as third-party partners, including consultants, agents, vendors and distributors.

We recognize that our employees are our most valuable asset, and we not only have a responsibility to embrace a diverse workforce, but to also promote diversity in the communities we serve. As such, we have invested in the following practices:

- Equal opportunity hiring and recruiting policy, including committing to shortlisting at least one woman and one member of an underrepresented group for each position.
- Annual trainings for all employees on topics related to diversity, equity, and inclusion
- Implementing formal targets to make a specific percentage of purchases from women, veteran, BIPOC (Black, Indigenous and People of Color), LGBTQIA+ owned suppliers
- Tracking representation of underrepresented groups in our marketing assets.

## RECRUITMENT AND HIRING

We recruit, hire, develop and promote people based on their qualifications, performance and abilities. We are committed to making sure that all employees and applicants for employment have equal and fair opportunities for success and advancement regardless of race, color, religion, sex, national origin, age, pregnancy, citizenship, disability, marital or familial status, sexual orientation, gender identity, military or veteran status, size, physical appearance, HIV status, ancestry, neurodiversity, genetic predisposition, family responsibilities or other legally protected characteristics.

## NON-DISCRIMINATION

LifeStraw expressly prohibits discrimination and harassment in our workplaces and our business conduct and encourages the development of mutual respect, understanding, and appreciation of different perspectives and backgrounds. For reporting discrimination either witnessed or experienced, please refer to the “Speaking Up” section of the Code.

## WORKPLACE HARASSMENT; VIOLENCE; ABUSE

We are committed to maintaining a work environment that is free from violence, threats, harassment, intimidation and other disruptive behavior. Violence, threats, harassment, intimidation and other disruptive behavior in our workplace will not be tolerated.

We need employee cooperation to maintain a safe working environment. Employees and partners should not ignore violent, threatening, harassing, intimidating or other disruptive behavior. If you observe or experience such behavior by anyone on our premises, whether that person is an employee or not, report it immediately to a supervisor or [hr@lifestraw.com](mailto:hr@lifestraw.com). Your report will be confidential. Threats or assaults that require immediate attention should be reported to the police.



## HEALTH, WELLNESS AND SAFETY

Maintaining a safe and sustainable environment both inside and outside the workplace is vital to our health and well-being.

We strive to provide a safe and hygienic working environment for our employees and to meet or exceed the standards of all applicable laws and regulations governing workplace safety, health and the environment, including paying living wages and not working excessive hours. If you or any employee is asked to do something either harmful to their health or the health of another person, or that is against applicable labor and environmental laws, you should not comply and should report the incident to HR immediately.

We continuously seek to reduce the environmental impact of our operations and regard good health as a basic human right.

## RESPONSIBLE WORKPLACE

We are committed to the preservation of a responsible workplace.

- The use, sale, purchase, transfer or possession of any illegal substances is strictly prohibited in our workplace and we require our employees to be free of any measurable amounts of illegal drugs in the workplace.
- We recognize that substance dependency is a serious medical issue. Employees who are experiencing substance abuse or dependency challenges are encouraged to disclose these challenges to a member of HR immediately so that LifeStraw may initiate recovery support programs for such employees.
- There may be situations where the consumption of alcohol will be permitted at work events. Employees are expected to exercise reasonable professional judgment when consuming substances during these times. The use of alcohol during business events and/or company activities shall comply with all applicable international, federal, state and local laws.

Our Responsible Workplace Policy is located [here](#).

## EMPLOYEE DEVELOPMENT AND ENGAGEMENT

The success of LifeStraw depends on each employee in the company. Working at LifeStraw provides everyone with the challenge of meaningful work as well as opportunities to develop their individual skills for career advancements or transitions. We have a unique and rewarding start-up culture where people can convert their passions into action and make a difference in the world. We believe that a learning environment is just as essential for employee development and motivation as financial incentives, therefore, we invest in the following practices:

- Each employee receives annual formal feedback on their performance as it relates to company values, impact and personal targets and key performance indicators.
- Reimbursements for career-specific or life-skills trainings.
- Each employee receives 8 hours of paid time off per quarter to volunteer for a cause that is important to them.

# SOCIAL AND ENVIRONMENTAL RESPONSIBILITY

## OUR RESPONSIBILITY: ENVIRONMENT

- We believe in minimizing our environmental footprint and in making products that leave the planet in a better place and inspiring others to do the same. For more information about our packaging, visit the Doing Good section of our website found [here](#).
- We have a strict policy of use of only FSC/(recycled) certified paper products in our office, packaging and printed materials.
- We are a carbon neutral company with membership to Climate Neutral, measuring our carbon footprint annually and offsetting all carbon emissions.
- We have a written policy encouraging environmentally preferred products and practices in both physical and virtual offices.
- We are committed to supporting climate advocacy through storytelling, awareness building and membership to industry organizations and associations.
- LifeStraw is committed to working with suppliers / countries that focus on continual improvement with sustainability goals.

## OUR RESPONSIBILITY: SOCIAL IMPACT

LifeStraw is committed to ensuring that all our products have positive social impact. That is why for every product we sell in retail, a school child receives safe water for an entire school year. This is implemented through LifeStraw's own [Give Back Program](#) in which we make long term commitments of 5 years to every school where we work.

LifeStraw is also committed to responsibly responding to emergencies and disasters when possible and appropriate with safe water solutions and to supporting underrepresented communities with safe water solutions in the US and near places where we operate.

As part of our social responsibility, LifeStraw also commits design resources towards creating appropriate products for humanitarian response and give back programs. The product a retail customer needs for use in the outdoors or at home is not the same product that a child needs to access safe drinking water at school.

## OUR RESPONSIBILITY: ETHICAL SOURCING

We also believe that our products should be made under safe, fair and humane working conditions and that our raw materials are ethically sourced. We pledge to adopt an Ethical Trading Code found [here](#).

## OUR RESPONSIBILITY: TRANSPARENCY

We are committed to transparently reporting our annual responsibility goals and progress through the release of a detailed annual responsibility report and scorecard which can be found [here](#).

# AVOIDING CORRUPTION AND IMPROPER ADVANTAGES

## BRIBERY AND KICKBACKS

Employees may not give anything of value to **ANYONE** as an inducement to obtain business or favorable treatment.

Likewise, employees may not accept anything of value either for themselves or for others in return for favorable treatment from customers or suppliers. All contacts and dealings with customers and suppliers must be conducted to avoid even the *appearance* of impropriety.

LifeStraw does not tolerate corruption, extortion or bribery. Extortion and bribery are forms of corruption. **Corruption** is the abuse of entrusted power for personal gain; **Extortion** is a criminal offense of obtaining money, property or services from an individual or institution, through coercion; and **Bribery** is the act of giving or receiving something of value in exchange for influence or action in return, that the recipient would otherwise not provide or receive.

## Global Anti-Corruption Laws

The U.S. Foreign Corrupt Practices Act (FCPA), UK Bribery Act 2010 and other anti-corruption laws prohibit various types of "corrupt payments" - that is, payments, offers or promises intended to secure an improper business advantage. Because violations of these laws can lead to substantial penalties, you should consult with your supervisor and/or the Legal Department ([legal@lifestraw.com](mailto:legal@lifestraw.com)) regarding any questionable payments or activities.

## Facilitating Payments

Facilitating payments are typically small, unofficial payments made to public or government officials to secure or expedite a routine administrative task that the person or company making the payment is entitled to. These types of payments are in general not allowed and are prohibited by many laws including the UK Bribery Act 2010. We must always apply an attitude of firm resistance to requests for such payments. However, we should never refuse to make a payment in a situation of threat of, or fear of, violence or loss of freedom. In all circumstances, any requests for and/or payment of a facilitating payment must be reported to the Legal Department.

## CONFLICTS OF INTEREST

A conflict of interest is a situation in which an employee has a personal or private interest that interferes with (or appears to interfere with) their ability to do their job fairly and ethically. Our policy regarding conflicts of interest is simple:

Do not compete with our company, and never let business dealings on behalf of the company be influenced (or appear to be influenced) by personal or family interests.

Conflict-of-interest issues typically arise in these settings:

- Holding a position or having a business interest in a competitor, supplier, customer or partner;
- Participating in activities that compete with our company;
- Allowing family or personal relationships to influence business judgment; or
- Taking corporate opportunities for personal gain.

Employees, contracted personnel, and business partners in general, have an obligation to disclose any potential conflicts of interest to LifeStraw. Consequently, we may refuse to engage into a business where

such conflicts could arise. If in doubt, employees are encouraged to talk to their supervisor or the Legal Department ([legal@lifestraw.com](mailto:legal@lifestraw.com)).

## MEALS, GIFTS AND ENTERTAINMENT

Meals, gifts and entertainment are common business courtesies provided to or received from third parties (customers, suppliers, business partners, government officials, etc.) as part of the company's business activities. In general, meals, gifts and entertainment are permitted under limited circumstances. For example, marketing efforts, business coffees, lunches and dinners can be offered to, or received from, third parties while complying with the Code as long as:

- They are business-related and consistent with locally accepted business practice and the respective third party's code of conduct;
- They are not offered or received for the purpose of obtaining an improper advantage;
- They could not be perceived as a bribe, do not make the recipient feel obligated, or make it difficult for the recipient to make a fair decision;
- They are occasional, and not offered or received on a regular basis to or from the same people;
- They are reasonable in value considering the jurisdiction or country where they are offered or received;
- Purpose and names of participants in business meals are clearly mentioned in the expense reports or credit card statements to be approved as per current policies; and
- The inclusion of spouses or significant others in any business meals complies with the above requirements.

LifeStraw has to consider the above factors when LifeStraw employees and supporters meet annually in Kenya to experience first-hand the impact LifeStraw has made on the lives of local school children; historically, LifeStraw has covered the cost of this trip for certain supporters. The Give Back Program is the heart and soul of LifeStraw: for every LifeStraw product sold, a school child in need receives safe water for an entire school year.

Employees must exercise the utmost care when giving or receiving "Code-compliant" business-related meals, gifts and entertainment. Consider that any type of meal, gift or entertainment is unacceptable if it could compromise your business judgment or improperly influence customers, suppliers, business partners or government officials.

Keep in mind that gifts may be tangible or intangible items of value or tokens of appreciation. Certain gifts or business courtesies, such as cash, checks, gift certificates, gift cards or equivalents, are never acceptable. If there is any doubt about whether a particular meal, gift or entertainment is appropriate, employees should consult their supervisor or the Legal Department ([legal@lifestraw.com](mailto:legal@lifestraw.com)). It is the employee's responsibility to voluntarily disclose and report any meals, gifts and entertainment that do not comply with this Code. LifeStraw maintains a registry for any gifts given and/or received; please contact the Legal Department ([legal@lifestraw.com](mailto:legal@lifestraw.com)) to record any such gifts.

## POLITICAL ACTIVITY

Contributions (monetary or in-kind) made on behalf of LifeStraw to political organizations or their representatives are generally not allowed. Only our designated representatives may speak on the company's behalf about politics and related matters. Never use our company's funds or resources for political activities, even if those funds are reimbursed.

Note, we recognize an employee's right to vote and be politically active on their own behalf, on their own time and using their own resources. Employees should never feel pressured to make a political contribution or to vote in a certain way by anyone working for us or on our behalf.

## CHARITABLE CONTRIBUTIONS

LifeStraw has officially contributed to certain organizations that are closely aligned with the company's values, including The Conservation Alliance, the NAACP's Legal Defense Fund and Color of Change.

## DONATIONS AND SAMPLES

Donations (monetary or in-kind) and samples are allowed if they are in accordance with applicable laws and regulations, follow the spirit of the Code and are in accordance with our internal policies.

Donations are typically made in relation to company events and sponsorships, while samples are usually used to secure a future sale. Donations and samples need to be approved in advance (before they are made or even promised to third parties), as per the Delegation of Authority Policy.

# PROTECTING OUR ASSETS

## PROTECTING COMPANY ASSETS

We all have an obligation to protect our company's assets and ensure their efficient use. Theft, loss, misuse, carelessness and waste have a direct impact on our profitability. Thus, we strictly prohibit the use of company time, employees, supplies, equipment, tools, buildings and other assets for personal benefit without prior authorization.

Among our most important assets is our electronic-communication systems, which include a secure network, email, Internet access, instant-messaging, voicemail, etc. Assets and data created by employees belong to the company and cannot be shared or stored on employees' personal hard drives. We reserve the right to monitor data and information stored and shared via company assets and communication channels.

Improper use of our assets by employees can lead to issues of workplace discrimination and harassment, copyright infringement, antitrust violations, the loss of trade secrets, and other legal problems for the company. It can also lead to discipline — and possibly termination — of the employee(s) involved.

All employees must:

- Store paper documents in secure spaces, such as locked file cabinets;
- Never leave a computer unattended;
- Use a strong (hard-to-crack) password for access to our computer network and not share passwords with others, including co-workers; and
- Safeguard mobile devices that contain sensitive personal data, such as laptops, tablets and mobile phones. Safeguarding is done using multifactor authentication.

If you believe that any company assets have been lost, stolen, or otherwise comprised, you must report the issue immediately to the Legal Department ([legal@lifestraw.com](mailto:legal@lifestraw.com)).

## BUSINESS RECORDS

Our business records are among our most important and valuable assets. Business records include essentially everything that you produce as an employee, regardless of its format. A business record may be in the form of paper, electronic data, email or voicemail. Letters, memoranda and contracts are considered business records, but so are things such as a desk calendar, an appointment book or an expense record.

We are required by law to maintain certain types of business records, usually for a specified period of time. The failure to keep these records for these minimum periods could subject us to penalties, fines or other sanctions or could put us at a serious disadvantage in court.

If you are unsure how our policies apply to any records you work with, please seek guidance from your supervisor or the Legal Department ([legal@lifestraw.com](mailto:legal@lifestraw.com)).

## MAINTAIN ACCURATE RECORDS

We require our employees to accurately and completely record all payments and transactions in our company's books and records. Accurate accounting is fundamental to sound business practices.

Remember:

- Our financial reports are reviewed by banks, board of directors and our auditors, and inaccuracies or omissions could be extremely damaging;
- We rely on accurate financial reports for developing essential business strategies;
- Always follow established accounting procedures to ensure information is complete, accurate and understandable;
- Any attempt to misrepresent, conceal, omit or mislead could be considered fraud for which there are severe criminal penalties; and
- Anyone who reviews our financial records has an obligation to scrutinize them and report suspected irregularities.

## PROTECTING PERSONAL DATA & PRIVACY

We are committed to ensuring that the data of our customers and partners remain private and protected and we recognize a consumer's right to access, rectify and/or erase their data. LifeStraw systems are compliant with all applicable laws. Our Privacy Policy can be found [here](#).

# IMPLEMENTING, TRAINING, AND MONITORING

## IMPLEMENTING

The LifeStraw Board of Directors shall appoint an **Internal Compliance Council** ("ICC") which has the following overall responsibilities:

- Implementation of the Code;
- Maintenance of the Code principles in the organization;
- Ensure that relevant contract clauses are incorporated in agreements entered into by LifeStraw, and that such clauses are updated if and when required; and
- Continue adherence to and follow up of the UN Global Compact Principles and monitor of any internal and external developments.

## TRAINING

LifeStraw employees and contracted personnel shall receive specific training on the Code on a regular basis and shall therefore know and act in accordance with the Code when acting on behalf of LifeStraw.

First time participants shall receive complete training in all relevant aspects, whereas subsequent sessions may be tailored to only the parts which are more relevant to each job function. Personnel with exposure to bribery-related issues and risks shall receive specific compliance objectives and training.

Acknowledgement of training participation (whether physical or through online compliance systems) is mandatory. Follow-up of individual training shall be done if and when required. Proper records of training areas, dates and participant names shall be maintained under the authority of Human Resources ([hr@lifestraw.com](mailto:hr@lifestraw.com)).

## MONITORING

The ICC is comprised of the CEO, CFO and Corporate Counsel and has the following overall responsibilities:

- Execution of the implementation of the Code;
- Monitor the compliance activities to ensure the maintenance of the Code principles in the company;
- Report (quarterly or as required) to the Board on the status of the implementation of the Code and maintenance of its principles.

The ICC shall continuously define and implement appropriate controls. They shall maintain and monitor a business transaction self-assessment through pre-defined reporting formats by senior management. The ICC meets quarterly and records minutes.

From time to time, Internal Audit and Compliance audit LifeStraw's records to ensure the correct implementation of the Code.

# SPEAKING UP

## REPORTING VIOLATIONS

All employees have a responsibility to understand and follow our company's policies, procedures and applicable laws. Violations may lead to disciplinary action, up to and including termination of employment. Likewise, employees are required to report violations that they observe or learn of. Employees who have knowledge of wrongdoing but fail to report it may also be subject to disciplinary action.

We will treat the information reported confidentially to the extent possible, consistent with our obligation to investigate. No one, including managers and other employees, will retaliate against an employee who makes a good-faith report or inquiry of a suspected violation or irregularity. The protection from retaliation does not, however, preclude legitimate disciplinary action justified by an employee's misconduct or poor performance. In our company, any suspected or actual violation, including complaints received, must be promptly reported by employees through one of the following channels:

- Your supervisor;
- Human Resources;
- A member of the ICC; and/or
- The LifeStraw Ethics Hotline.

## LIFESTRAW ETHICS HOTLINE

A third-party vendor, Fulcrum, runs the multi-lingual, confidential LifeStraw Ethics Hotline, which can be accessed in the following ways:

- A web-based form located at [www.whistleblowersystem.com/lifestraw/](http://www.whistleblowersystem.com/lifestraw/)
- E-mail sent to [whistle@fulcrum.com](mailto:whistle@fulcrum.com)
- A phone line at +1-213-596-1909, answered by professional personnel from 8:30 a.m. to 6:00 p.m. Pacific time on normal business days. Outside these hours, the phone will be answered by an automated voice mail system.
- By fax to +1-213-891-1300
- U.S. mail addressed to Fulcrum Inquiry, Whistleblower Department, 707 Wilshire Blvd., Suite 2050, Los Angeles, CA 90017.

You may also report the matter by contacting your supervisor or contacting the Legal Department at [legal@lifestraw.com](mailto:legal@lifestraw.com).

## INVESTIGATING CONCERNS RAISED

The company will use all reasonable efforts to investigate concerns raised in good faith by any employee or third party without undue delay, including those which are raised anonymously. Where appropriate and permissible under law, notification will be provided to the individual who raised the concern when an investigation has been concluded.