



BUSINESS INTEGRITY POLICY

The purpose of this policy is to describe our requirements for conducting business to the highest ethical standards at HSLC. Our policy sets forth what we expect from every single person who works for HSLC and for the businesses and organizations that we partner with. These policies also underline our responsibilities to our people, partners, and communities we serve. Furthermore, our commitment to observing the highest ethical behavior is evidenced by our accreditation with the Standards for Excellence program, and achievement of the Platinum level Transparency Seal from Candid. For more information, please see <https://hslc.org/about/business/>

Speaking up

We want to enable and encourage our people to feel comfortable to report any suspected wrongdoing at any level of the organization without fear of reprisal. All concerns raised will be taken seriously and investigated appropriately.

Honesty

We work honestly. We are truthful in our work-related interactions, whether in explaining a problem or in reporting results, and we work in the best interests of HSLC.

Compliance with the law

We operate and function within the applicable laws of the United States and respect the rule of law in all our dealings. We clearly communicate procedures for disciplining those who do not comply with the law or our standards and policies.

Anti-Corruption

We prohibit corruption. Our interactions with our partners and all government officials and agencies, whether local, regional, or national, are beyond reproach. We do not give bribes, and we only use appropriate and lawful means when engaging with government officials, our partners, and other stakeholders when acting for the benefit of HSLC. We keep accurate books and records of all of our transactions, including those with commercial partners, non-governmental organizations, and government agencies.

Fair Dealing

We must all deal fairly with our vendors and other parties with whom HSLC has a business relationship and with each other. No persons subject to this policy should attempt to take unfair advantage of any such person through manipulation, concealment, abuse of confidential Information, misrepresentation of facts or any other unfair practice.

Accuracy and Reporting

We are committed to providing timely, factual and accurate disclosure of material information about HSLC. We ensure that material information about HSLC is disclosed in a consistent and appropriate manner, and in accordance with applicable law. We take appropriate measures to protect and prevent the improper disclosure or use of material or confidential information about HSLC.

Conflicts of Interest

We avoid conflicts of interest. Hiring or overseeing family members, significant others, and even close personal friends can pose conflicts of interest. Therefore, these types of hiring decisions and supervisory relationships are avoided or carefully reviewed. Similarly, close relationships with contractors or suppliers can pose real or perceived conflicts. As a result, employees must not participate in decisions on behalf of HSLC about whether to engage with contractors or suppliers if that employee or a family member stands to personally benefit. Employees must also avoid conflicts of interest that could arise because of their involvement with another company, especially if that involvement includes control or employment relationships with suppliers or competitors of HSLC.

Political donations

We prohibit the making of corporate donations for political purposes to any politician, political party or related organization, an official of a political party or candidate for political office in any circumstances either directly or through third parties.

Gifts

We do not allow gifts or entertainment to improperly influence our decisions. While giving or receiving gifts or entertainment can be culturally appropriate and part of the normal course of doing business, inappropriately doing so can create the perception of impropriety and violate anti-corruption laws. All work-related gifts and entertainment worth more than US \$100, given or received by HSLC employees, must be reported to the Executive Director.

Diversity and Inclusion

We pursue equality of opportunity and inclusion for all employees through our employment policies and practices. We aim to create an inclusive environment which provides equality of opportunity and freedom from unlawful discrimination. We must

all challenge discriminatory behavior when we see it. We want everyone to feel able to raise any concerns.

Approved August 16, 2024