

Code of Conduct

[Episcopal Church of Liberia](#)

[Development Society](#)



WELCOME TO THE BOARD of the ECL Development Society (ECL-DS)

Adopted Code of Conduct for Good Governance

Being established to ensure self sustainability for the Episcopal Church of Liberia and its institutions, means being part of a team that will be creative in establishing revenue and cash flow programs to support the present and future strategic goals of our Church including churches buildings, clergy and laity wellbeing, retirement and institutional financial security, the ECL-DS is a unique community, and private sector entity committed to establishing a single-purpose program that is to convert Liberia based assets into investment capital anywhere in the world. Thus, we are not only a Development Society corporation with an important mandate to serve, but we also will have operational oversight as an investment management firm with private sector principles and practices. This carefully crafted balance is an integral part of our distinctive culture, which is driven by our Guiding Principles of Integrity, High Performance, and Partnership. Our Code of Conduct supports and further reinforces this necessary culture for our credibility. The behaviors and values reflected in the Guiding Principles and the Code of Conduct not only define who we are, but are key ingredients in our success.

Each of us and those we do business with are responsible for preserving and enhancing a world-class reputation befitting to the trust, confidence and accountability to each other, the Church and to our God. Our Code of Conduct reflects the most rigorous standards of integrity and professional conduct and our commitment is to always act in the best interests of ECL-DS.

We operate with a high degree of trust. Using a principles-based approach, our Code of Conduct sets out what we expect of everyone. It also explains how to get help and who to contact if you are unsure about something or have any questions regarding the behavior of a third party.

Let it be our operating culture to follow the words in this Code Of Conduct.

The Chairman and Board Members of the ECL Development Society accept this document as the guiding value principle for all members, associates, contractors and entities that they do business with.

EPISCOPAL CHURCH OF LIBERIA DEVELOPMENT SOCIETY

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1. ECL-DS Code of Conduct: Introduction and Your Important Role

1.1. Who Are We and What is Our Code?

ECL-DS is a unique resource and investment organization empowered by the Board of Trustees and mandated to provide resources for the implementation of the strategic plan of the ECL. Our Guiding Principles of Integrity, Partnership and High Performance will set ECL-DS apart from other investment organizations. The Guiding Principles help us foster an ethical and inclusive culture of which we should carry proudly. It is our individual responsibility to follow our Guiding Principles and this Code of Conduct, and ensure that all whom we do business with are also in compliance.

Put simply, at ECL-DS:

- **We act with integrity** – To maintain the trust put in us, we are honest and transparent, and we stick to our word. What we say is what we must do. We must lead by example, and speak up about any conduct we observe that contradicts our principles, values, or this Code of Conduct.
- **We are effective partners** – We work together to make sure that we fulfill our responsibilities to our God, ourselves and to our Church. We believe that a unique mix of experiences and insights leads to better decisions and we build our team with that in mind. Fairness and respect are paramount to our success. Together, we share responsibility for our wins and our failures.
- **We aim to be the best we can be** – We hold ourselves to the highest standards. We aim high, with the foundation of our Guiding Principles and this Code of Conduct as we carry out our business activities the right way. We remember that high performance must be achieved with integrity and partnership.

This Code of Conduct governs and applies to all of us at all levels including:

- Employees and those we do business with
- Officers
- Members of our Board of Directors

Please note that we also may contractually require certain third parties providing services to us or acting on our behalf (such as consultants) to comply with certain principles set forth in this Code.

In this document, “you” and “your” refers to you as a ECL Colleague, and “we”, “us” and “our” refers to all of us at ECL-DS.

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1.2. How to Use the Code of Conduct

This Code of Conduct is not designed to cover every situation or dilemma you could face in your role. Instead, this Code should serve as a resource to point you in the right direction, including highlighting questions to ask yourself, our other policies and procedures that might help you decide what your next steps should be, or people you can reach out to at ECL-DS for additional input and assistance.

Some Helpful Questions

In most situations, your sense of honesty and integrity will determine the right path to take. However, if you are not sure of the right thing to do, it may be helpful to ask the following questions:

- Is it consistent with our Guiding Principles of Integrity, Partnership and High Performance? •

Is there a ECL-DS policy or procedure to guide you in the right direction?

- Is it legal?

- How would your conduct (or failure to act) reflect on yourself, your team, or ECL-DS?

- Have you consulted with Human Resources, Legal & Compliance, or your manager?

- Would you or your family personally benefit from the act or would the act in any way call into question whether you are acting in the best interest of ECL-DS?

Ultimately, the question to ask is: Is it in the best interest of ECL? In considering this question, it is never in the best interest of ECL to violate the Code, even if you believe the action would result in a benefit to ECL-DS.

1.3. Your Important Role: You need to Speak Up

If you believe there has been a violation of the Code or suspect any kind of breach, you must report it immediately. Standing by and observing what you believe to be misconduct taking place without speaking up is a breach of the Code.

Am I Protected if I Report?

You are obligated to speak up to stop wrongful conduct when you believe that you have seen it. We also understand that speaking up requires trust on behalf of the person speaking up. We are committed to fostering a safe environment for reporting of any concerns, with an *absolute* prohibition on retaliation for concerns raised in good faith. We will maintain the confidential nature of your report, and anonymity, to the greatest extent possible.

If you were involved in the misconduct you are reporting, your honest efforts to self-report personal misconduct will be considered in determining the appropriate outcome to remedy the Code breach.

in disciplinary action.

How do I Report?

You may bring any concerns or reports regarding misconduct, unethical behavior, breach or suspected breach of the Code or any law or regulation applicable to ECL-DS business and activities to the resources and channels provided in the “Expectations – We Need to Speak Up – You are Not Alone” sections in this document

Your report will be accepted in good faith and you will be treated with dignity and respect.

Failure to report a violation or suspected violation of the Code, or any ECL-DS policy, can result in disciplinary action by ECL-DS, including impact upon compensation, termination of employment or business relationships.

You are Not Alone

ECL-DS is committed to providing you with the resources to help you fulfill the expectations under this Code. *The Conduct Review Advisor*

The Conduct Review Board Member (“CRBM”) acts as a confidential source of advice to employees, officers, directors and relevant third parties about ethical conduct as set out in the Code, and assists the Governance Committee in monitoring how the Code is applied and reviewing it for any appropriate changes. Additionally, the CRBM counsels on matters relating to ethical conduct, including those that may be referred to by the Chairperson of the Board of Directors, the President and Chief Executive Officer or the General Counsel.

If you are not sure what the right thing to do is, the CRBM can give you confidential advice.

Other Resources for Voicing Questions and Concerns

You should always speak up if you have any questions or concerns regarding the Code. Rest assured that CPPIB takes speaking up very seriously, and will not tolerate retaliation in any form towards anyone who speaks up in good faith. You may always address your questions or concerns to any of the resources listed in Appendix B.

Remember, in addition to personally acting in a manner consistent with this Code of Conduct and our Guiding Principles, you must also speak up when you become aware of any potential violation. This is the only way we can truly protect our culture.

2. Our Guiding Principles - Integrity, Partnership and High Performance

2.1. Expectations

Our culture is grounded in our Guiding Principles and we expect ECL-DS Colleagues to act according to the highest standards of professional conduct. Discrimination and harassment is not tolerated. As a starting point:

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- **We are respectful** – Respect is a core value of ECL-DS and is a foundational element of our Guiding Principles. We must respect each other’s contribution and expertise. ECL-DS employs highly qualified individuals and we should provide equal opportunities to all based on merit, team needs, qualifications, experience, effort, and ability. We must also be inclusive, and we will not engage in discrimination, harassment, or retaliation against

any individual or group.

part in activities that would call into question our integrity, including knowingly misrepresenting or causing others to misrepresent facts.

• **We are honest** – We do not take

representatives of our public mandate. Our actions and behaviors must reflect positively as we operate transparently and honor our commitments. We do what we say.

• **We are trustworthy partners** – We are

to get ahead of the game – We comply with all ECL-DS policies and procedures, including the Code, as well as all laws and regulations that apply to ECL-DS. We accomplish our goals honestly and our principle of high performance does not stand above integrity and partnership.

• **We do not break (or bend) the rules**
• **We are discreet** – We protect confidential information. In sum, your behavior needs to meet or exceed our expectations.

2.2. Fraud, Corruption and Bribery

ECL-DS trusts all ECL-DS Colleagues to uphold the highest standards of integrity while conducting business on our behalf, because we are all representatives of our public mandate. You must never engage in fraudulent or corrupt practices for the benefit of yourself, ECL-DS, or other third parties. You are also responsible for making this responsibility clear to any ECL-DS business partners or service providers that you work with and speaking up if you see anything concerning.

In some instances, there may be a conflict between the applicable laws of two or more countries, states, provinces or jurisdictions; if you encounter such a conflict, or if a local law conflicts with a policy set forth in this Code of Conduct, you should ask for help from Legal or Compliance.

In the event that you are temporarily or permanently suspended from a professional association or licensed activity, where such licensing is a requirement of your job, you have an obligation to immediately inform us of the situation.

2.3. Fraud

ECL-DS does not tolerate any form of fraud, including collusion, falsification of records, or asset misappropriation. You must not engage in this conduct in any form.

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2.4. Corruption and Bribery

As part of a global investment organization, we must comply with numerous anti-corruption and anti-bribery laws and regulations. Because of the global nature of ECL-DS business, we must uphold this responsibility everywhere we do business, not just where ECL-DS offices.

As a result, all ECL-DS Colleagues should adhere to the highest ethical standards. You must not accept, give or promise, directly or indirectly, anything of value to any employee or official of a government (including state owned companies) or a political party, candidate for office, or any other person to obtain or retain business or

to secure any advantage with respect to any aspect of ECL-DS business.

You may not avoid these requirements by acting indirectly via third parties such as business partners, consultants, contractors, vendors, suppliers, or agents acting on ECL-DS behalf, or by using your own personal funds. CPPIB also prohibits facilitation payments in any amount and form.

Please refer to our [Anti-Corruption and Anti-Bribery Policy](#) for comprehensive guidance on corruption and bribery issues. (see attached)

2.5. Gifts, Entertainment and Other Benefits

We must be vigilant about how we deal with giving and receiving gifts, entertainment, travel, and other benefits and favors, as these benefits may expose us to risk, as described in our Anti-Corruption and Anti-Bribery Policy. We are mindful of the public's perception of how we deal with benefits, entertainment, gifts and favors.

What MAY I do?

Unless prohibited below, you may only accept or offer benefits, entertainment, gifts or favors when they meet the following criteria:

• It is

legal – It does not violate this Code, any applicable law, regulation or ECL-DS policies;

• It is

modest – It is a modest token of courtesy or appreciation, consistent with the culture and traditions of where you are based, and less than \$500.00 in value;

• **It is not compromising** – It does not in any way compromise or could be perceived to compromise the integrity or objectivity of you or ECL-DS, or otherwise affect your decision or obligations and it does not create a conflict of interest (real or perceived); and

• It is not

embarrassing – It is not something that would be shameful or embarrassing to you or ECL-DS. **What can I**

NOT do? You cannot accept or offer, *under any circumstances*: • Any form of benefits, entertainment, gifts or favors from existing or potential business partners: in exchange for, or as a condition of, exercising your duties; to induce certain behavior while carrying out your and/or ECL-DS duties and responsibilities, or when it results in, or could appear to result in, preferential treatment. Cash incentives, preferred pricing, loans at preferred rates, or secret commissions or kickbacks in exchange for preferential treatment.

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What MUST I do?

Lead by example – Make sure that you comply with the Code when interacting with third parties;

•

Record – Make sure that you retain accurate records of the value of any gifts, entertainment or other benefits you might have given or received, including keeping any tickets and receipts;

•

Explain the stakes – Make sure third parties understand the requirements of the Code, and that we cannot conduct business with those who violate our Code;

•

Return, report, disclose – Return any inappropriate gifts and kindly explain the reason for the return, and disclose any gifts that exceed the permitted value. Every quarter, you must report the benefits, entertainment, gifts and favors that you have given and received during the period.

Refusing a gift can be awkward, especially if you think you might offend someone. However, knowing when to decline a gift should be guided by this Code of Conduct or local applicable laws, rule and regulation where you are. Maintain ethical relationships with third parties. Understand proper entertainment. Never accept benefits in exchange for preferential treatment. If the gift is not of normal value, nor lawful under the applicable law, or not consistent with the gift guidelines within this section of the Code, you should politely decline to accept the gift. You may not use agents, consultants, independent contractors, or other representatives to do indirectly what you could not do directly under this Code of Conduct. If you receive an invitation or are offered the opportunity to attend a spectator sporting or entertainment event and feel there's a strong business reason for you to attend, speak to your immediate manager. He or She will advise you on the appropriate next steps. Such an invitation cannot be accepted without Chairman or CEO approval. Any form of benefits, whether it is a cash or cash equivalent (including preferential pricing or loan rates), gift, hospitality or intangible benefit (such as preferential treatment) are strictly forbidden under an internship for a brother or sister in exchange for favor under any circumstances

2.6. Personal Conduct – Ability to Perform

You cannot be impaired by drugs (regardless of whether they are illegal or legal, prescribed or non-prescribed), alcohol, or other substances when undertaking your role for ECL-DS. Being impaired by improper use of substances is not permitted by the Code.

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2.7. Conflicts of Interest

You should apply your best effort, knowledge, skills, and judgment to carrying out your duties and responsibilities for ECL-DS. Personal activities and interests should not unduly distract you. Conflicts of interests can affect your performance and judgment, whether intentionally or unintentionally, and can create the appearance of impropriety. A conflict of interest occurs when your work for ECL-DS could be improperly influenced by an outside or personal activity, interest or relationship. A conflict of interest could be an actual conflict, a potential conflict or a perceived conflict.¹

We understand that our lives and relationships are not always straightforward, and one cannot avoid all

conflicts of interest, as conflicts may not always be predictable. Moreover, conflicts can arise from existing relationships, or they can gradually manifest as your personal relationships and professional networks develop with business partners. However, the key question is whether you have taken appropriate actions and sought early guidance on navigating these potential conflicts should they arise. As such, you are required to make disclosure of any real, potential, or perceived conflicts as soon as possible and if necessary work with Compliance to address any conflict.

Our directions regarding the risks, identification, disclosure requirements, and resolution of conflicts of interest can be found in our [Conflicts of Interest Policy](#).

When in doubt, you should consult the Senior Managing Director, General Counsel. Transparency matters, and it is always better to disclose and seek guidance, even for potential conflicts.

2.8. Personal Trading and Market Manipulation

While you work, you may come across material information related to public companies that is not generally disclosed to the public – commonly referred to as material non-public information (“MNPI”). Using MNPI in making securities trading decisions (including derivative trading or to otherwise secure a financial benefit) is strictly prohibited and is a violation of the law in most jurisdictions. You must not:

- **Improperly use MNPI** – You cannot engage in Insider Trading, i.e. you cannot trade in the security of a particular company while in possession of MNPI on that particular company;
- **Improperly transmit MNPI** – You cannot pass MNPI outside the normal course of your ECL-DS business activities to another person who may conduct trades based on that information (commonly referred to as “Tipping”) or to recommend another person trade; and

¹ A perceived conflict of interest is when you are in, or could be in, a situation that appears to a third party to be an actual conflict for you or ECL-DS, even if that is not the case.

- **Improperly influence security prices** – You cannot engage in fraudulent or deceitful activity with the purpose of manipulating or artificially affecting the price of a security.

Remember, ECL-DS has zero tolerance for insider trading, tipping and market manipulation.

As insider trading and market manipulation laws and rules can be complex and are evolving, ECL-DS has established the [Personal Trading Policy](#) to protect you and ECL-DS from engaging in, or being perceived to engage in, improper trading activities.

As a general matter, you must:

- **Clear** – Pre-clear all trades (unless it is a trade in exempt securities or in a fully managed account);
- **Abstain** – Abstain from trading (buying or selling) in securities where you have not been given the authority to trade; and
- **Disclose** – Disclose information about your investment activities following the procedures described in the Personal Trading Policy.

Any questions about the Personal Trading Policy can be directed to the MD, Head of Compliance.

2.9. Political Activity

It is your right to be an active and engaged citizen in your community. This includes having personal political affiliations as a voter or supporter of a political candidate, party or movement, or being a registered member of a political party. However, it is important to distinguish your personal political affiliations and actions from your work on behalf of ECL-DS. Because of our public mandate, we must avoid any appearance of ECL-DS favoring or disapproving of a particular political group, candidate, or political position.

If you were to take part in political activity, you should keep in mind the following:

- **Use your own resources** -- You may not use ECL-DS resources or property for your personal political activities or purposes;
- **Be clear it is a personal opinion** – You must be clear when participating in political activity that you are doing so on a personal basis and that your actions and comments do not represent ECL-DS in any way; and
- **Let us know** – Other than expressing your individual support and affiliations towards certain political positions and groups on a personal basis, if you become involved in activities related to or organized by a political group, party or movement, including any promotional activity, publicity, volunteering, fundraising, and campaigning, you must consider our Conflict of Interest Policy. If you are unsure whether your proposed political activity may constitute a conflict of interest, please consult with the Head of Compliance.

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Directors and officers (including our President and Senior Managing Directors) may not participate in any political activity that could:

- Be incompatible with their duties as a ECL-DS officer or member of ECL-DS's Board of Directors;
- Impair their ability to discharge their duties in a politically impartial fashion; or
- Cast doubt on the integrity, objectivity or impartiality of the [Board of ECL-DS](#).

There is an expectation that Directors, officers and employees, will promptly report any attempted external political interference with respect to our investment, procurement, hiring or any other decisions.

2.10. Communication

Whether in traditional forms of communication or on social media, it is important to remember your communications may reflect on ECL-DS regardless of whether you are expressing yourself in a personal or professional capacity. To prevent jeopardizing the public trust instilled in us through inappropriate communications, we have designed the following guidelines to assist you in making responsible decisions when communicating either directly or on a social media platform:

- **Speak for yourself** – You must not speak on behalf of ECL-DS without prior authorization from Public Affairs and Communications;
- **Keep confidential information confidential** – You are strictly prohibited from communicating or posting any information that is confidential, ECL-DS proprietary, or commercially sensitive² without prior authorization;
- **Be aware of your language and actions** – Inappropriate behavior can reflect negatively on ECL-DS, as can improper social media postings. You must not publish, post, or promote any unsuitable, defamatory, racist, obscene, false or misleading material or information, language that could reasonably be considered harassment or abusive, material or information containing nudity or depictions of violence, or materials or information that would otherwise contravene this Code. In short, do not publish, post or say anything that is inconsistent with our Guiding Principles, or anything that could shame or embarrass you, other employees or partners and/or ECL-DS; and
- **Do not ‘name drop’** – You must always receive approval from ECL-DS, your fellow employees, officers, clients, partners or suppliers before making any mention about them.

² E.g., internal reports, policies, designs, logos, trademark, technology, contracts, business plans, deals, strategies, customer/ client names, internal events including non-business team-building type events, etc.

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You must be aware that, even after a post is deleted, technology may still make that content available to others. The Internet is forever.

3. Protecting Our Information and Assets

3.1. Our Information

We frequently come into possession of sensitive information about our existing and potential business partners and investments across a broad range of asset classes. We also develop our information and strategies. It is critical that we manage such information properly, and it is also important that you do the same. You must take care to safeguard our information whether in any of our offices, while working outside our office or while traveling. Please keep track of information, in whatever format it exists. When discussing confidential information, do not speak where you can be overheard, and do not disclose any information to anyone unless

you have a proper business purpose. This obligation to keep confidential our information continues, even if you are no longer employed at ECL-DS.

3.2. Privacy & Data Protection

ECL-DS respects your privacy, as well as that of our business partners and other third parties we work with. We acknowledge that personal information has been entrusted to ECL-DS and are committed to protecting personal data and complying with applicable data privacy laws.

While the precise definition of “personal data” and terminology used (e.g., “personal information,” “personally identifiable information”) may vary across laws and jurisdictions, “personal data” generally refers to any information that relates to an identified or identifiable person.

We value the trust placed in us when it comes to handling personal data. Additional information may be found in our [Privacy Policy](#).

If you become aware of any instance where personal data has been improperly handled, please notify Compliance immediately.

3.3. Our Resources

Our Resources (including our technology such as laptops and mobile phones) are to be used for the benefit of ECL-DS. Incidental personal use is acceptable, but it should not result in costs to ECL-DS. You must not use ECL-DS property for any inappropriate or illegal activity.

Our people are here to work for the benefit of ECL-DS. Reliance on ECL-DS Colleagues to manage your personal obligations is not permitted.

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4. Acknowledgement & Consequences

4.1. Acknowledgment & Annual Certification

Before you begin your employment with us or take on your role as a director, you will need to complete two³ forms relating to the Code:

- A formal acknowledgment that you have read and understood the code and will comply with it.
 - You are also required to certify your ongoing compliance with the Code. Twice a year, the Head of Compliance will send you a request to certify that you have read and understood the Code

and that you have complied with it during the specified reporting period.

- Please personally review the Code and certify your compliance and do not delegate your obligation to personally certify to another ECL-DS Colleague. These forms will be included in your offer letter and a sample of the acknowledgement form can be found under Appendix A.
- A Personal Information Form, an example of which can be found in the [Conflicts of Interest Policy](#).

4.2. Consequences for Failure to Comply

We have a responsibility as a team to comply with the Code. **Failure to comply with any aspect of the Code may result in sanctions, discipline (including impact on compensation), or, in some cases, termination of employment.**

The Code is reviewed at least once a year, and any necessary updates will be made at that time. Always check our website (www.episcopalchurchliberia.org) for the most recent version. If you are a ECL-DS Colleague, you need to follow our corporate policies and management authorities. Check the policies and management authorities section on our intranet for the most recent versions.

³ Other forms or disclosures may be required depending on an individual's circumstances.

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Appendix A – Acknowledgment

Acknowledgment

As required by our Code of Conduct, please complete this form. By signing, you are acknowledging that you have read, understood and will abide by the content therein.

“We,” “us” and “our” refer to the ECL-DS

“You” and “your” refer to an employee, officer or director or Board Member. “Code” means the ECL-DS Code of Conduct.

- When you begin working for us or serving on our board

As a new employee, officer or director, you are required to read and understand our Code of Conduct, and acknowledge that you have done so and will comply with the Code.

Your acknowledgment

Please check the appropriate boxes below.

- You acknowledge that you have read and understood our Code.
- You agree to conduct yourself according to the principles and guidelines for ethical behavior as set out in our Code.
- You agree to formally acknowledge at least twice a year while you are working for us, or serving on our board, that you have read, understood and complied with the Code.

Please print/input name:

Please sign here:

Signature _____ Date _____

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Appendix B – Other Resources for Voicing Questions, Concerns and Speaking Up

You should always speak up if you have any questions or concerns regarding the Code. Rest assured that ECL-DS takes speaking up very seriously, and will not tolerate retaliation in any form towards anyone who speaks up in good faith. You may always address your questions or concerns to any of the following resources:

- **Your direct or indirect manager, or another appropriate employee;**
- **Human Resources;**
- **Legal and Compliance;**
- **ECL-DS Conduct Review Advisor;**

- Our President and CEO; or

Remember, in addition to personally acting in a manner consistent with this Code of Conduct and our Guiding Principles, you must also speak up when you become aware of any potential violation. This is the only way we can truly protect our culture. ECL-DS encourages you to use any of the resources listed above to speak up.

Episcopal Church of Liberia Development Society's Code of Conduct