



African Clean Energy Code of Ethics



Updated March 2021

Signed off by:

*Judith Joan Walker - COO
African Clean Energy*



Contents

ACE Core Values	5
Core Values	5
ACE Employees	5
Respect for the Individual	5
Open and Honest Working Culture	5
Health and Safety	5
Smoking	5
Drugs	5
Protective Clothing	6
Weapons	6
Equal Opportunities	6
Protection from Harassment	6
Conflicts of Interest	7
Hiring	7
Gifts	7
Unfair Advantage	7
Whistleblower Policy	7
ACE Customers	8
Respect for the Customers	8
Health and Wellbeing	8
Privacy Protection	8
ACE Data & Reporting	9
Record Keeping	9
Data Privacy and Security	9
Scientific Integrity	9
Set Metrics and Report Results Accurately	9
Law & Transparency	9
Uphold the Law in Letter and Spirit	9
Fight Bribery and Corruption	9
Fair Trade and Fair Competition	10
Human Rights and Child Labour	10
Environmental Protection	10
Environment	10
Recycling and Refurbishing	11
E-waste Management	11

Company

African Clean Energy (ACE) is a B-corp certified enterprise that aims to provide rural households in Sub-Saharan Africa and Southeast Asia, our customers, with clean energy. This is done through manufacturing and distributing our unique product, the ACE One Energy System.

Purpose

The purpose of this Code of Ethics is to set forth the basic principles for the employees of ACE and to codify standards reasonably designed to deter wrongdoing. Such a Code will focus management on areas of ethical risk, provide guidance to staff to help them recognize and deal with ethical issues, and help to foster an awareness of the ACE's obligations to employees, customers, other stakeholders and the general public.

Scope

This code is applicable globally to all employees, including the ACE's directors and senior managers, coordinators and team leaders, officers and representatives, and employees of all other position levels. ACE has in place Guidelines, Standard Operating Procedures (SOPs) and other HR policies to support the implementation of this Code. In addition to this Code, all employees are expected to strictly comply with legal requirements and local customs.

Definitions

Word	Definition
Bribery / Bribe	To directly or indirectly offer a financial or other advantage to another person in order to persuade them to take a particular action.
Bullying	Repeated unreasonable behaviour over time that has the potential to cause harm to another person or persons.
Child / Children	A person or persons who is or are below the age of 18.
Child Labour	Any work or activity that is mentally, physically, socially or morally dangerous and harmful to children and deprives children of their childhood.
Conflict of Interest	When an individual's personal interests, such as a family member, friendship or financial factors, could compromise his or her judgment, decisions, or actions in the workplace.
Corporate Social Responsibility (CSR)	The act of incorporating societal, economic, and environmental concerns into a company's planning and operations.

Drugs	Illegal substance taken for its narcotic or stimulant effects.
Employee	Any person who has a part-time, full-time, intermittent, continuous or fixed-term employment relationship with the company.
E-waste	Electronic waste; appliances that need to be discarded.
Fraud	Dishonestly obtaining a benefit or causing a loss by dishonest or other improper means.
Harassment	Any improper and unwanted behaviour that makes a person feel threatened, intimidated, degraded, humiliated or offended.
Metric	Measures of quantitative assessment.
Privacy	A person's right to control access to his or her personally identifiable information.
Record	Official company documents.
Standard Operating Procedures (SOPs)	The detailed written descriptions of the company's processes that aim to ensure consistency and quality in process execution.
Human Trafficking	The recruitment, transportation, transfer, harbouring or receipt of people through force, fraud or deception.
Whistleblower	An employee of ACE (and any subsidiaries) who reports an activity that he/she considers to be illegal or dishonest to one or more of the parties specified in this Policy

ACE Core Values

The Code of Ethics is a direct reflection on the company and the company's core values and guiding principles. The four values of ACE include:

1. Core Values

- 1.1. Respect
- 1.2. Quality
- 1.3. Equality
- 1.4. Honesty

ACE Employees

2. Respect for the Individual

- 2.1. Within our organisation, all colleagues, partners and suppliers will be treated with respect, regardless of role or background.

3. Open and Honest Working Culture

- 3.1. ACE believes that each person within the company brings vital value and should be treated as such. Communication should be open, transparent and without negative consequence. Mutual respect is vital and must be maintained at all times.
- 3.2. ACE believes that employees should always have:
 - 3.2.1. Someone to speak to/ report problems/ report discrepancies to.
 - 3.2.2. No negative consequences for reporting someone for just reason.
 - 3.2.3. Right to fair warning and opportunity to defend oneself.

4. Health and Safety

- 4.1. ACE shall, so far as is reasonably practicable, ensure the safety, health, welfare and environmental awareness at work for all its employees in accordance with the applicable laws of each country of operation.
- 4.2. All employees must ensure that they comply with the company's policies and procedures on Occupational Health and Safety and environmental standards, which may be developed from time to time.

4.3. Smoking

- 4.3.1. Smokers shall observe the rights of nonsmokers; and to this end, no smoking shall be allowed in the company's premises.

4.4. Drugs

- 4.4.1. ACE will maintain drug-free workplaces and not tolerate the sale, transportation, distribution, possession, or use of any drug or narcotic substance deemed to be illegal in the countries of operation.

4.5. Protective Clothing

- 4.5.1. Protective clothing, equipment and accessories shall be provided to an employee whose job is otherwise likely to impair health, or cause bodily injury or damage to clothing. It is mandatory for an employee to wear the safety clothing or gear that is provided.
- 4.5.2. Such protective clothing, equipment, and accessories shall be provided at no charge to the employee and shall be replaced by the company, as and when deemed necessary by the company.

4.6. Weapons

- 4.6.1. No employee shall carry a dangerous weapon to any place of work, except such employees who are duly authorised to carry such weapons due to the nature of their work.
 - 4.6.1.1. Dangerous weapons are guns, knives, or any other substances that management deem to be dangerous.

5. Equal Opportunities

- 5.1. No employee, customer or stakeholder, nor anyone else, shall receive less favourable treatment or opportunity on the grounds of age, gender, race, colour, marital status, national, ethnic or social origins, political opinion, religious affiliation, sexual orientation, union membership, or any other grounds whatsoever.
- 5.2. ACE is committed to creating inclusive opportunities for those seeking employment in the markets in which we operate. This includes actively recruiting individuals who may struggle to find employment, such as women, youth, individuals above 50 years of age and individuals with a disability.
 - 5.2.1. ACE has set targets of hiring disabled employees, with a target of at least 10% of the total workforce.
 - 5.2.2. ACE has a target to have at least a 50% female workforce, including management, ownership and board members.
- 5.3. ACE commits to hiring, as much as possible, from the community local to operations, including all management level roles. This is with the goal of creating great jobs in emerging markets.

6. Protection from Harassment

- 6.1. ACE will always work together with employees to ensure safe passage to and from work and shelter in case of need.
- 6.2. Harassment and bullying will not be tolerated under any circumstances and all incidents will be treated very seriously by the relevant HR and Management departments.
- 6.3. ACE commits to preventing sexual exploitation and abuse in the workplace. Victims' and survivors' safety and wellbeing will be paramount to reporting and their information will be treated confidentially.

7. Conflicts of Interest

7.1. Hiring

- 7.1.1. Employees must avoid conflict of interest at all cost and shall separate their own personal interests from those of the company.
- 7.1.2. Employees with responsibility for hiring new staff shall disclose any existing relationship with candidates to senior management.

7.2. Gifts

- 7.2.1. No employee shall accept, except on behalf of the company, a gift, donation, award, bonus, gratuity, remuneration, financial assistance, or other reward from any person, other than the company, for services rendered in their official capacity as employees of the company. Whenever such an offer to an employee is made, the Country Director must be notified and their consent obtained prior to acceptance thereof.

7.3. Unfair Advantage

- 7.3.1. ACE is not unequivocally opposed to close relationships with suppliers and 3rd parties, but must be aware of all existing relationships in order to assess whether or not the choice to work with or extend contracts to partners/suppliers/consultants is justifiable or whether there is an unfair advantage being extended.
- 7.3.2. Applicants and employees are obliged to disclose as soon as possible any existing relationship (including, but not limited to family, long-term partnership, etc.) to an applicant or employee.

8. Whistleblower Policy

- 8.1. A whistleblower as defined by this policy is an employee of African Clean Energy (and any subsidiaries) who reports an activity that he/she considers to be illegal or dishonest to one or more of the parties specified in this Policy. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures; appropriate management officials are charged with these responsibilities.
 - 8.1.1. Examples of illegal or dishonest activities are violations of federal, state or local laws; billing for services not performed or for goods not delivered; and other fraudulent financial reporting.
 - 8.1.2. If an employee has knowledge of or a concern of illegal or dishonest fraudulent activity, the employee is to contact his/her immediate supervisor or the Human Resources Manager. The employee must exercise sound judgment to avoid baseless allegations. An employee who intentionally files a false report of wrongdoing will be subject to discipline up to and including termination.
- 8.2. Whistleblower protections are provided in two important areas – confidentiality and against retaliation. Insofar as possible, the confidentiality of the whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law and to

provide accused individuals their legal rights of defense. The company will not retaliate against a whistleblower. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, or poor work assignments and threats of physical harm. Any whistleblower who believes he/she is being retaliated against must contact the Human Resources Manager immediately. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

ACE Customers

9. Respect for the Customers

- 9.1. ACE commits to providing high quality and affordable products to all customers, regardless of their financial status. ACE believes that no one should be limited to low cost products with little efficiency benefits, including those in the developing world.
- 9.2. ACE believes that everyone deserves quality products and services. We strive to raise the standards and believe in treating all customers as equal.
- 9.3. As customers are highly valued, ACE strives to actively and regularly listen to its customers in order to address their potential challenges and provide the best service possible.
- 9.4. All ACE employees shall demonstrate professional and respectful behaviours towards customers during demos and/or any other circumstances when representing the company.

10. Health and Wellbeing

- 10.1. We are committed to protecting the health and well-being of our customers in all our operations.
- 10.2. ACE aims to mitigate health risks associated with cooking in open fires. Through our product we protect our customers of being exposed to high levels of smoke.

11. Privacy Protection

- 11.1. ACE commits to taking measures necessary to protect the privacy of all customers, business partners and 3rd party stakeholders unless express permission is given to share agreed upon details with parties outside of ACE.
- 11.2. ACE is committed to collecting customer data that is relevant to the fulfilment of the business purpose.
- 11.3. ACE commits to fairness of data by allowing customers to express inaccuracies, anonymising customers and by avoiding misrepresenting the customer.
- 11.4. ACE commits to transparency of data for clients and the public.

ACE Data & Reporting

12. Record Keeping

- 12.1. Employees must ensure that all official records are properly identified and maintained according to ACE guidelines. The records are required to be true and accurate and intentionally misusing or wrongly editing of official records is prohibited.

13. Data Privacy and Security

- 13.1. ACE is committed to keeping internal data safe. All company confidential or proprietary data will solely be used within the company and shall not be disclosed to anyone outside the company, except when disclosure is required by laws or regulations.

14. Scientific Integrity

- 14.1. ACE is committed to the highest standards of scientific integrity when performing any research-oriented work. These include ensuring that research is documented, contains valid data, and results and conclusions are independent and unbiased.

15. Set Metrics and Report Results Accurately

- 15.1. Tracking our success and impact is vital to the company's strategy. Honest and accurate reporting will be built into every department and clear goals should be set to achieve growth and success.
- 15.2. Regular and random audits will ensure consistency of data and reporting. This must be planned and delivered on in agreement with the head office.

Law & Transparency

16. Uphold the Law in Letter and Spirit

- 16.1. ACE commits to transparency and honesty and following the letter and spirit of the law wherever we operate.

17. Fight Bribery and Corruption

- 17.1. ACE is committed to transparency and honesty and will never perform, condone or tolerate bribery or corruption within ACE or in dealing with 3rd parties. Even in situations where there is financial risk or severe inconvenience to ACE, we are committed to honest and lawful transactions in all cases.
- 17.2. ACE commits to transparency and the public disclosure of any financial or in-kind contributions to political groups, politicians, charitable organisations, lobby groups an/or advocacy groups.

- 17.3. ACE is committed to compliance with all obligations to pay taxes, duties, and charges imposed in the countries of operation as required by law.
- 17.4. ACE will ensure that all financial transactions comply with agency and legal requirements as well as applicable accounting standards.

18. Fair Trade and Fair Competition

- 18.1. ACE is committed to following all rules and regulations of fair trading guidelines as defined in each country we trade in.
- 18.2. ACE is also committed to supporting new legislation to help improve these trade guidelines, create opportunities to improve each market for our industry and support others to raise the standards for everyone.
- 18.3. ACE commits to searching out and contracting local suppliers whenever feasible, without compromising on quality.

19. Human Rights and Child Labour

- 19.1. ACE commits to ensuring there is no infringement on any human rights within our organisation or any of our partners. This extends to ceasing any relationship with companies that are found not to meet our high standards, and putting pressure on companies within our network or knowledge that are found not to meet our high standards.
- 19.2. ACE does not tolerate or condone the transportation, sale or trafficking of human beings.
- 19.3. ACE is committed to the safety and protection of all children encountered during work and believes that all children have the right to be free from violence, abuse, and exploitation of any kind.
- 19.4. ACE supports the right of all children to be safe, including those with disabilities or who are living in areas impacted by instability.

Environmental Protection

20. Environment

- 20.1. ACE will engage in environmentally sustainable development and is committed to comply with environmental protection legislation in the countries of operation.
- 20.2. Although the ACE One is an emission-reducing product we are aware that each unit embodies emissions associated with its manufacture and transport.
- 20.3. ACE shall commit to ensuring that manufacturing and distribution operations are conducted in such a way to minimise incidental carbon emissions.
- 20.4. **Recycling and Refurbishing**
 - 20.4.1. ACE commits to ensuring that all waste materials from manufacturing which can be recycled are recycled.

- 20.4.2. Those materials which are not recycled, are disposed of safely.
- 20.4.3. ACE aims to maintain close contact with customers in order to track maintenance issues with the product. This ensures that our products are being used effectively, maximising their environmental benefits. This also means that ACE are able to collect any damaged or non-functional parts and either refurbish them to be used in another unit or recycle them safely.

20.5. E-waste Management

- 20.5.1. ACE commits to following the guidelines for e-waste management set by the National Environment Management Authority (NEMA), which includes guidelines set for manufactures, importers, recyclers and refurbishes.
- 20.5.2. As manufacturers, ACE will ensure that proper channels are established in order to safely collect e-waste.
- 20.5.3. As importers of electric goods, ACE will ensure that these are reached to the predestined customers and will avoid importing hazardous electric equipment.
- 20.5.4. As recyclers and refurbishers, ACE will ensure that third parties dismantle products in an environmentally safe manner and send unusable materials to a licensed disposer.
- 20.5.5. ACE will also ensure that all elements in our products that are harmful to human health will be disposed of correctly.