



CODE OF ETHICS

& BUSINESS CONDUCT

Purpose

The **Lasixy Technologies Code of Ethics & Business Conduct** establishes the principles and standards that guide how we conduct our business, interact with people, deliver our services, manage our resources, and engage with clients, partners, communities, and other stakeholders.

Lasixy is committed to conducting its activities with **integrity, professionalism, accountability, respect, fairness, transparency, and responsibility**.

This Code provides a common ethical standard for everyone representing Lasixy and is intended to support responsible and sustainable business practices.

Our Ethical Commitment

Lasixy Technologies believes that **how we achieve results is just as important as the results themselves**.

We are committed to creating value while respecting **human dignity, fundamental rights, fair labour practices, environmental responsibility, and the principles of integrity and anti-corruption**.

Our Code is guided by internationally recognized principles, including the **United Nations Global Compact Ten Principles**, the **Universal Declaration of Human Rights**, the **ILO Declaration on Fundamental Principles and Rights at Work**, and the **UN Guiding Principles on Business and Human Rights**.

The Code complements the applicable laws, regulations, contractual obligations and other Lasixy Policies.

Scope

This Code applies to everyone acting on behalf of or representing Lasixy Technologies, including:

- Directors and executives
- Managers and supervisors
- Permanent and temporary employees
- Contract staff
- Consultants
- Trainers and instructors
- Interns and volunteers & Project teams
- Agents and representatives
- Contractors and service providers, where applicable

Employees and representatives are expected to understand and comply with this Code and to seek guidance whenever they are uncertain about the appropriate course of action.

Lasixy also expects its business partners and suppliers to operate in accordance with applicable ethical, legal and professional standards.

1. Core Ethical Values

Our conduct shall be guided by the following values:

Integrity

We do what is right, honest, and responsible, even when no one is watching.

Respect

We treat every person with dignity, fairness, and professionalism.

Accountability

We take responsibility for our decisions, actions, commitments, and results.

Excellence

We strive for high standards in our training, technology, projects, services, and relationships.

Innovation

We encourage responsible innovation and the use of technology to create meaningful and sustainable solutions.

Inclusivity

We promote an environment where people have fair opportunities to participate, learn, contribute and grow.

Responsibility

We consider the social, environmental and economic impact of our decisions and activities.

2. Respect For Human Rights

Lasixy respects internationally recognized human rights and is committed to conducting its activities in a manner that respects the dignity and rights of all persons.

We shall:

- Treat all individuals with dignity and respect.
- Prohibit harassment, intimidation, abuse, and degrading treatment.
- Respect privacy and personal dignity.
- Promote equality and fair treatment.
- Take appropriate steps to identify and address potential human rights risks within our activities.
- Encourage our business partners and suppliers to uphold similar standards.

The UN Guiding Principles describe respect for human rights as a global standard of expected conduct for businesses and call for businesses to prevent, mitigate, and address adverse human-rights impacts.

3. Equal Opportunity & Non-Discrimination

Lasixy is committed to providing equal opportunities in employment, training, recruitment, career development, and participation in our programmes.

We do not tolerate unlawful discrimination based on characteristics protected by applicable law.

Employment and professional opportunities shall be based on relevant qualifications, competence, performance, experience, conduct, and organizational requirements.

We particularly encourage inclusive participation in technology, engineering, digital skills, professional development, and other areas where access to opportunity may be limited.

4. Dignity, Harassment & Workplace Conduct

Every person working with or representing Lasixy has the right to a professional environment free from harassment, bullying, intimidation, violence, and abuse.

Prohibited conduct includes:

- Sexual harassment
- Verbal or physical abuse
- Threats or intimidation
- Bullying
- Humiliation or degrading treatment
- Retaliation against persons who raise genuine concerns
- Any other inappropriate conduct prohibited by applicable law or company policy

Employees and representatives are expected to communicate professionally and respectfully at all times.

5. Fair Labour Practices

Lasixy supports fundamental labour rights, including freedom from forced labour and child labour, non-discrimination, freedom of association, and a safe and healthy working environment. These are among the ILO's fundamental principles and rights at work.

Lasixy shall:

- Prohibit forced or compulsory labour.
- Prohibit child labour in accordance with applicable law and international standards.
- Promote fair and respectful employment practices.
- Provide a safe and healthy working environment.
- Respect applicable working-hour and employment requirements.
- Respect employees' lawful rights to organize and engage in collective representation.
- Promote professional development and learning opportunities.

6. Health, Safety & Well-Being

Safety is a shared responsibility at Lasixy.

All employees, instructors, contractors, students, visitors, and project personnel are expected to follow applicable health and safety requirements.

This includes:

- Following established safety procedures.
- Using required Personal Protective Equipment (PPE).
- Reporting hazards, incidents, and unsafe conditions.
- Properly handling tools, equipment, electrical systems, and technical installations.
- Participating in required safety briefings and inductions.
- Never knowingly placing another person at unnecessary risk.

Detailed health, safety and environmental requirements shall be established under Lasixy's **Health, Safety & Environmental (HSE) Policy**.

7. Business Integrity

Lasixy conducts its business honestly, fairly and professionally.

Employees and representatives shall:

- Provide accurate information about Lasixy's services and capabilities.
- Avoid misleading or deceptive representations.
- Respect contractual commitments.
- Deal honestly with clients and stakeholders.
- Protect confidential information.
- Avoid unfair business practices.
- Maintain professional relationships with clients, competitors, suppliers and institutions.

Employees must not misrepresent their qualifications, experience, authority or the capabilities of Lasixy.

8. Anti-Bribery & Anti-Corruption

Lasixy maintains a **zero-tolerance approach to bribery and corruption**.

No employee or representative may offer, promise, authorize, request, receive or provide an improper benefit intended to influence a business decision or obtain an unfair advantage.

This includes:

- Bribes

- Kickbacks
- Improper payments
- Facilitation payments where prohibited
- Undisclosed commissions
- Improper advantages
- Misuse of company resources
- Manipulation of procurement or tender processes

Employees must exercise particular care when dealing with government officials, public institutions, procurement processes and regulated entities.

Detailed requirements are established in the **Lasixy Anti-Fraud, Anti-Bribery & Anti-Corruption Policy**.

9. Gifts, Hospitality & Conflict of Interest

Employees must avoid situations where personal interests conflict, or appear to conflict, with Lasixy's interests.

Employees shall disclose any actual, potential, or perceived conflict of interest to management.

Gifts, entertainment, hospitality, discounts, favors, or other benefits must never be accepted or offered where they could improperly influence a business decision.

Particular caution shall be exercised when dealing with **government officials, public institutions, procurement processes, tenders, and regulated entities**.

10. Responsible Procurement & Business Partners

Lasixy expects suppliers, contractors, consultants, and other business partners to conduct themselves ethically and responsibly.

We seek to work with partners who:

- Comply with applicable laws and regulations.
- Respect human rights.
- Avoid forced and child labour.
- Maintain appropriate safety standards.
- Avoid bribery and corruption.
- Provide accurate documentation.
- Maintain professional business practices.
- Respect environmental responsibilities.

Lasixy reserves the right to review or discontinue relationships where serious ethical violations are identified.

11. Confidentiality & Protection of Information

Confidential information must be protected from unauthorized access, disclosure, misuse, alteration, or loss.

This includes:

- Client information
- Employee information
- Financial information
- Project documents
- Training records
- Business strategies
- Technical information
- Software and intellectual property
- Passwords and access credentials
- Proprietary materials

Information shall only be accessed, used, or shared for legitimate business purposes and in accordance with applicable law and company policies.

12. Data Protection & Privacy

Lasixy recognizes the importance of responsible management of personal and organizational data.

Personal information shall only be collected, used, stored, shared and protected responsibly and in accordance with applicable data-protection requirements.

We are committed to:

- Collecting information responsibly.
- Using personal information only for legitimate purposes.
- Protecting personal and confidential information.
- Limiting unauthorized access.
- Supporting appropriate data-security practices.
- Respecting applicable data-protection requirements.
- Promoting responsible use of emerging technologies.

Employees must not use company or client data for unauthorized personal purposes. Follow Lasixy's **Data Protection & Privacy Policy**.

13. Responsible use of Technology & Artificial Intelligence

As a technology organization, Lasixy recognizes its responsibility to promote ethical and responsible use of technology.

Employees shall:

- Use technology for legitimate business purposes.
- Protect systems and information from unauthorized access.
- Respect intellectual property.
- Avoid misuse of company technology.
- Verify important information generated or assisted by artificial intelligence.
- Avoid entering confidential or sensitive information into unauthorized AI systems.
- Consider privacy, security, fairness and potential harm when deploying technology.

Technology and AI should be used to create value while respecting people, organizations and communities.

14. Environmental Responsibility

Lasixy recognizes its responsibility to reduce negative environmental impacts and promote responsible technology.

We shall seek to:

- Reduce unnecessary waste.
- Promote efficient use of energy and resources.
- Encourage responsible disposal of electronic and technical equipment.
- Support environmentally responsible technologies.
- Promote renewable-energy solutions where appropriate.
- Consider environmental risks when planning projects and operations.

Specific environmental responsibilities shall be addressed through Lasixy's HSE and sustainability-related policies and programmes.

These commitments align with the UN Global Compact's environmental principles concerning precaution, environmental responsibility, and environmentally friendly technologies

15. Responsible Training & Education

Lasixy is committed to providing professional, inclusive and responsible learning experiences.

We shall strive to:

- Provide accurate and relevant training content.

- Maintain professional standards among instructors.
- Provide safe learning environments.
- Treat students and participants with dignity.
- Protect participant information.
- Communicate programme requirements clearly.
- Maintain appropriate assessment standards.
- Represent certifications and accreditation status accurately.
- Avoid misleading claims about training outcomes or employment opportunities.

This applies to all Lasixy training programmes, workshops, community programmes and professional development initiatives.

16. Community Responsibility

Lasixy recognizes its responsibility to contribute positively to the communities in which it operates.

Our community-development activities may include:

- Digital skills development
- Technical training
- Youth empowerment
- Women's skills development
- Education and employability
- Entrepreneurship
- Renewable-energy education
- Technology access
- Community infrastructure initiatives
- Environmental and sustainability programmes

Community initiatives shall be designed and implemented responsibly, transparently and with respect for beneficiaries.

Specific commitments shall be established under the **CSR & Community Development Policy**.

17. Accurate Records & Transparency

Lasixy requires business records to be accurate, complete and appropriately maintained.

This includes:

- Financial records
- Contracts

- Invoices and receipts
- Procurement records
- Training records
- Attendance records
- Project documentation
- Employee records
- Regulatory documents

No employee may knowingly:

- Falsify records;
- Conceal material information;
- Create misleading documentation;
- Improperly alter records; or
- Destroy records to conceal misconduct.

18. Intellectual Property

Lasixy respects intellectual property belonging to the company and third parties.

Employees must:

- Protect Lasixy's intellectual property.
- Respect copyrights, trademarks, patents and other proprietary rights.
- Obtain appropriate authorization before using third-party materials.
- Avoid unauthorized copying or distribution of protected content.
- Properly attribute materials where required.

Company intellectual property must not be used for unauthorized personal or commercial purposes.

19. Responsible Communication & Representation

Only authorized persons may speak officially on behalf of Lasixy.

Employees representing Lasixy at:

- Conferences
- Training events
- Client meetings
- Government engagements
- Media activities

- Public events
- Social media platforms

must conduct themselves professionally and protect the company's reputation.

Marketing and promotional materials must be truthful, accurate and appropriately approved.

20. Speaking Up & Reporting Concerns

Lasixy encourages employees and stakeholders to raise genuine concerns regarding suspected misconduct, unethical behaviour, safety violations, fraud, corruption, harassment or other serious violations.

Concerns may be raised through designated company reporting channels:

Ethics/Compliance Email: info@lasixy.com

Telephone: +234 907 162 1791

Responsible Officer: Feefelobari Yoroka

Reports will be taken seriously and handled appropriately.

The detailed reporting and investigation process shall be established under Lasixy's **Whistleblowing & Speak-Up Policy**.

21. Non-Retaliation

Lasixy prohibits retaliation against anyone who, in good faith:

- Reports a concern;
- Raises a safety issue;
- Reports suspected misconduct;
- Participates in an investigation;
- Requests guidance regarding this Code; or
- Refuses to participate in conduct they reasonably believe to be unethical or unlawful.

Retaliation is itself considered a serious violation of this Code.

22. Management Responsibility

Management is responsible for establishing and maintaining a culture of ethical conduct.

Managers and supervisors shall:

- Lead by example.
- Communicate ethical expectations.
- Ensure employees understand applicable policies.

- Encourage responsible reporting.
- Respond appropriately to concerns.
- Avoid retaliation.
- Promote fair treatment.
- Ensure business targets do not encourage unethical conduct.
- Support compliance and responsible decision-making.

No commercial target or business objective justifies unethical conduct.

23. Compliance with Laws & Regulations

Lasixy and its representatives shall comply with applicable laws, regulations, contractual obligations and professional requirements.

Where applicable law establishes a higher requirement than this Code, the law shall prevail.

Employees are expected to seek guidance where they are uncertain about their legal or ethical obligations.

24. Breaches of the Code

Failure to comply with this Code may result in appropriate corrective or disciplinary action, consistent with applicable law and company procedures.

Depending on the nature and severity of a violation, actions may include:

- Counselling
- Corrective guidance
- Additional training
- Written warning
- Suspension
- Termination of employment or engagement
- Termination of a business relationship
- Recovery of losses
- Referral to appropriate authorities where required

25. Training & Awareness

Lasixy shall promote awareness of this Code through:

- Employee onboarding
- Staff training
- Management communication
- Periodic policy reviews

- Ethics and compliance awareness activities
- Appropriate acknowledgment procedures

Employees may be required to formally acknowledge that they have received, read and understood this Code.

26. Policy Governance & Review

The Code of Ethics & Business Conduct shall be reviewed periodically to ensure that it remains relevant and aligned with:

- Applicable laws and regulations
- International standards
- Organizational changes
- Emerging ethical risks
- Stakeholder expectations
- Lasixy's strategic direction

The **Policy Owner** shall coordinate periodic reviews and recommend amendments where necessary.

Core Principle

At Lasixy, professionalism, integrity, quality, and continuous improvement are not optional – they define who we are.

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