

RESPONSIBILITY • INTEGRITY • EXCELLENCE

BUSINESS CONDUCT AND ETHICS



MANUAL FOR THE GLOBAL
LIBERTY ALLIANCE



GLOBAL LIBERTY ALLIANCE

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November 2, 2018

Dear Friends of the Global Liberty Alliance,

Please familiarize yourself with the Global Liberty Alliance (“GLA”) Code of Business Conduct and Ethics Manual and acquaint yourself with the principles that guide the GLA’s work. As the GLA continues to expand its scope of work in the U.S. and around the world, the Code of Business Conduct and Ethics Manual will help guide our efforts no matter where we do our work.

The GLA aims to be a legal voice for persons especially in societies where the lack of rule of law makes it difficult to find justice. We seek to make a lasting difference in the world by filling that void. Sometimes we will do work in extremely challenging places. To succeed in this mission, it is essential that all team members adhere to the GLA’s three pillars: Responsibility, Integrity, and Excellence.

Attorneys must always adhere to the highest standards of ethical and professional conduct befitting the profession. We also expect all GLA team members, including sub-contractors, to review this Code and apply it daily in everything that we set out to do. For managers and supervisors, you have a special responsibility to lead by example, to establish the expectations for behavior, and by regularly speaking with your team about the importance of ethics and to maintain a work environment conducive to openness.

If you are ever in doubt about a particular transaction, or activity done as part of your GLA duties, please ask for guidance! Never act when in doubt about the propriety of any undertaking. We seek to cultivate a culture where team members can speak out without concern for retaliation or other adverse consequences.

Thank you for taking time to reviewing the Code. We welcome suggestions on how we can continue to improve this document. Suggestions should be made, in writing, and directed to the Board of Directors,

Sincerely,

Jason L. Peblete
GLA Founder and Attorney Advisor

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Introduction

Purpose

The Global Liberty Alliance (“the GLA”) has adopted the following policies and all team members are expected to be familiar with and to follow the GLA’s Code of Business Conduct and Ethics. This Code of Business Conduct and Ethics applies to anyone who works with the GLA as a volunteer, employee, or consultant.

Guidelines Only

The information and procedures provided in this manual represent guidelines to be followed by GLA personnel and are not inclusive of all laws, rules and regulations that govern the activities of GLA. Team members should conduct their activities in a manner that not only achieves technical compliance with this Code of Business Conduct and Ethics, but also abides by its spirit and principles.

GLA Mission and Values

The Global Liberty Alliance is a legal and public policy non-government organization based in the United States. Fund attorneys and public policy professionals defend wrongfully persecuted persons targeted by repressive governments, in nations with weak rule of law, as well as others denied the ability to freely exercise fundamental liberties in established democracies. Committed to the principles of free enterprise and limited government, GLA defends fundamental individual liberties and the rule of law wherever in the world U.S. persons or interests are threatened.

A public service project of the *PobleteTamargo LLP* law firm to, in part, help victims and families defray the costs associated with defending persecuted persons by autocratic repressive governments, GLA lawyers in the U.S. collaborate with like-minded lawyers in foreign countries to defend fundamental individual rights and the rule of law. Alliance attorneys, public policy professionals, and academics in the United States and in other nations collaborate on matters to help advance the public interest, defend fundamental rights and liberty.

Individuals the world over are denied the right to freely own property, worship as they please or say what they want. We work with lawyers in these places to help change that and raise awareness of the “rule of law gap.” Many of the cases fund lawyers defend arise in other nations; however, we also defend persons in the United States, and other democracies where local or state governments implement or enforce laws and regulations that violate, at times subtly, the fundamental rights of its citizens.

We believe in local accountability is the most effective approach for justice and rule of law. Only local solutions can engender the long-term benefits needed to create a stable civil society where every individual can live free; however, in many countries, weak democratic institutions and a lack of the rule of law make it difficult for wrongly persecuted persons to find justice.

For cases arising in foreign nations, our mission is to provide local counsel the legal and political support he or she needs to resolve legal and political disputes, locally. We do this, in part, by first working with local counsel to exhaust domestic court options rather than advocating in international bodies or tribunals such as the Inter-American Commission for Human Rights, the United Nations Human Rights Council, among others.

Despite the challenges, we believe that even in nations with weak legal systems, every effort should be made to resolve political and legal conflicts locally, before pursuing regional or international processes that usually involve un-elected and politically un-accountable international organizations and NGOs.

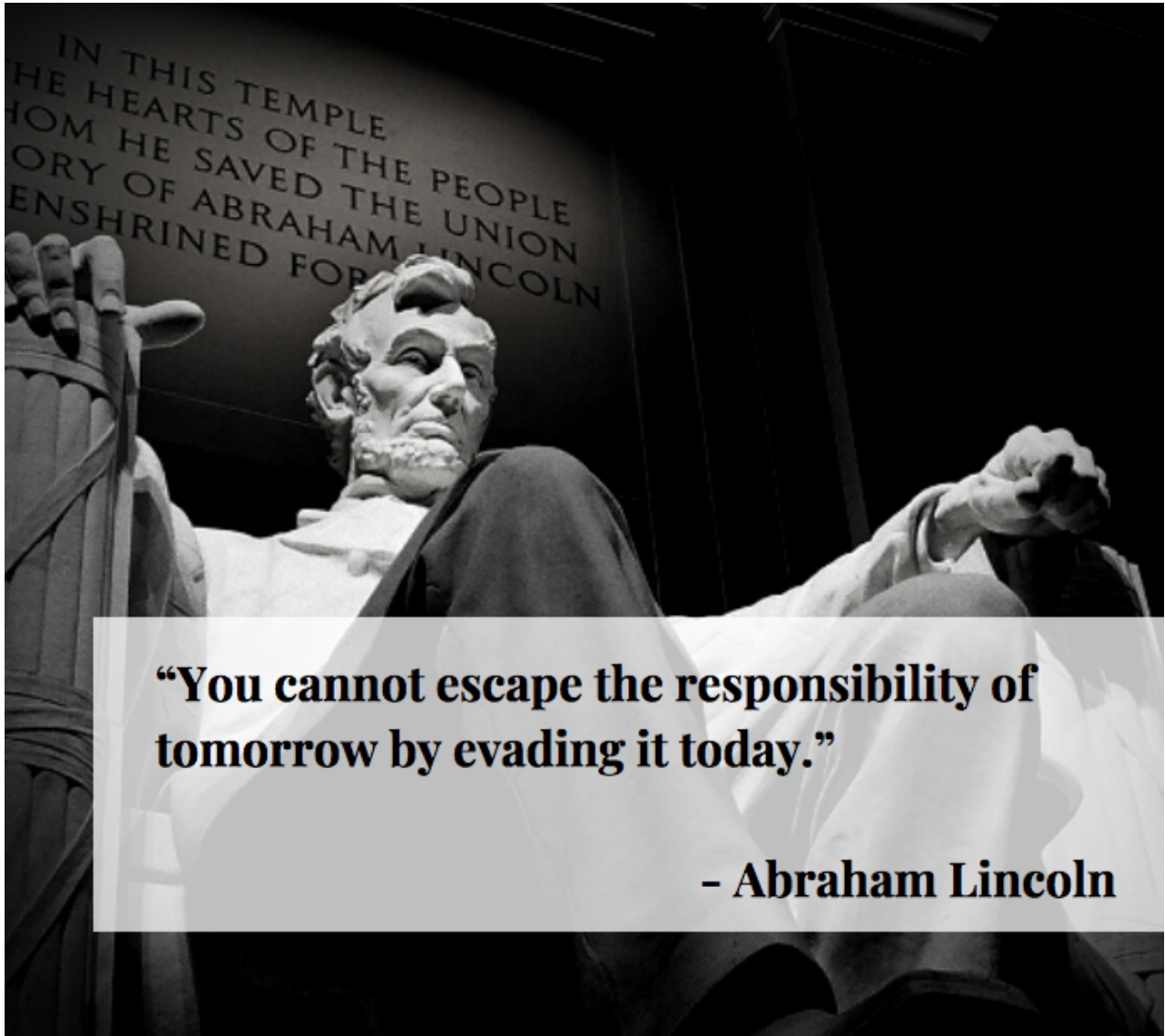
In some cases, moving quickly on multiple fronts and forums in several countries can make the difference, especially when the personal safety or liberty of the person is at stake. We believe the individuals, working in concert with others in their station in life, not governments, are the best change agents. To that end our legal and public policy professionals in the United States team with local experts to do their work.

We are committed to upholding the highest principles and standards of business and ethical conduct in all that we do. We apply these principles and standards in the course of our daily work. Through them, we hold ourselves and each other accountable for the integrity of our service to GLA clients and advocates the world over.

When carrying out our daily duties, we regularly face situations that involve ethical questions. From decisions as basic as how we use our time, to those as complex as how to navigate international jurisdictions, the public's perception of the integrity of the work we do, both individually and collectively, is at stake.

Sometimes it may seem "gut instincts" and good intentions may help us know the right thing to do; however, good instincts and intentions are not enough when the integrity of our work could be questioned. Consequently, we have a set of principles and a specific and enforceable set of standards and laws to help guide our conduct. These standards are governed by the GLA's three pillars: Responsibility, Integrity and Excellence. When we each act with integrity, and expect the same of others, we not only perform with excellence but we engender trust.

RESPONSIBILITY



Responsibility

Your Duty to Seek Advice or to Report

When you encounter improper or questionable behavior or suspected violations of the Code of Business Conduct and Ethics, you are expected to quickly bring these concerns to the attention of your team leader or the compliance officer. Your concerns or allegations may be raised confidentially and anonymously — without fear of retaliation — through the GLA’s ethics section of the GLA website.

Timely notification permits the GLA to resolve issues expeditiously. Timeliness also permits the GLA compliance members to inform clients of possible malfeasance that may require their involvement. If you fail to report suspected ethical violations promptly, you may be considered culpable and you may jeopardize the GLA’s ability to quickly and appropriately respond to the issue.

Training Requirements

Periodically, you will be required to take ethics training, and provide a written certification that you have reviewed, understand, and agree to comply with the GLA Code of Business Conduct and Ethics; and that you are not personally aware of any violations of the Code by others. This certification is your pledge to honor and fully comply with the Code’s provisions. You are subject to disciplinary action, up to and including termination, if you fail to do so.

Your Responsibility as an Employee

You should feel safe in reporting concerns and/or allegations, and confident that GLA will respond appropriately. You can, and should, make decisions and take actions on issues when it falls within your authority to do so. When you see something, say something. You are also responsible for:



1. Following GLA’s Code of Business Conduct and Ethics;
2. Taking annual ethics training and participating in supplemental reviews and meetings to ensure that you are fully aware of the issues involved;
3. Notifying your supervisor, senior leadership, ECO, or the ethics Alert System via globalcompliance@globallibertyalliance.org if you suspect fraud, conflict of interest, bribery, facilitation payments, kickbacks, gratuities, or other corrupt practices, or any violation of the Code of Business Conduct and Ethics; and
4. Seeking assistance or clarification to avoid unethical or illegal conduct prior to taking a questionable action.

Your Responsibility as a Manager, Supervisor, or Chief of Party/Team Leader

If you are a GLA manager, supervisor, or Chief of Party/Team Leader—or deputy—you are responsible for ensuring that your direct and indirect reports understand and follow the Code of Business Conduct and Ethics. You must establish and maintain a workplace culture in which employees feel comfortable doing what’s right at all times.

Make yourself available for questions and elevate ethical issues or allegations immediately to the proper level. Leaders must be ethical role models, demonstrating integrity, accountability, and respect for everyone, and regularly communicating the GLA’s expectations for ethical conduct while professionally and personally supporting these expectations.

GLA employees must regularly hear that their leaders take ethical behavior and compliance seriously.

Ethics and Compliance Officer (ECO)

The Ethics and Compliance Officer is the primary point of contact for questions, concerns, and allegations related to possible ethics or compliance violations, and for the receipt of any such allegations. The ECO monitor and log all issues, coordinate reviews and investigations, communicate with individuals making allegations, ask follow-up questions as necessary, and provide information on the resolution of ethics issues. The GLA Board has delegated to the ECO authority to make necessary disclosures to U.S. Government clients.

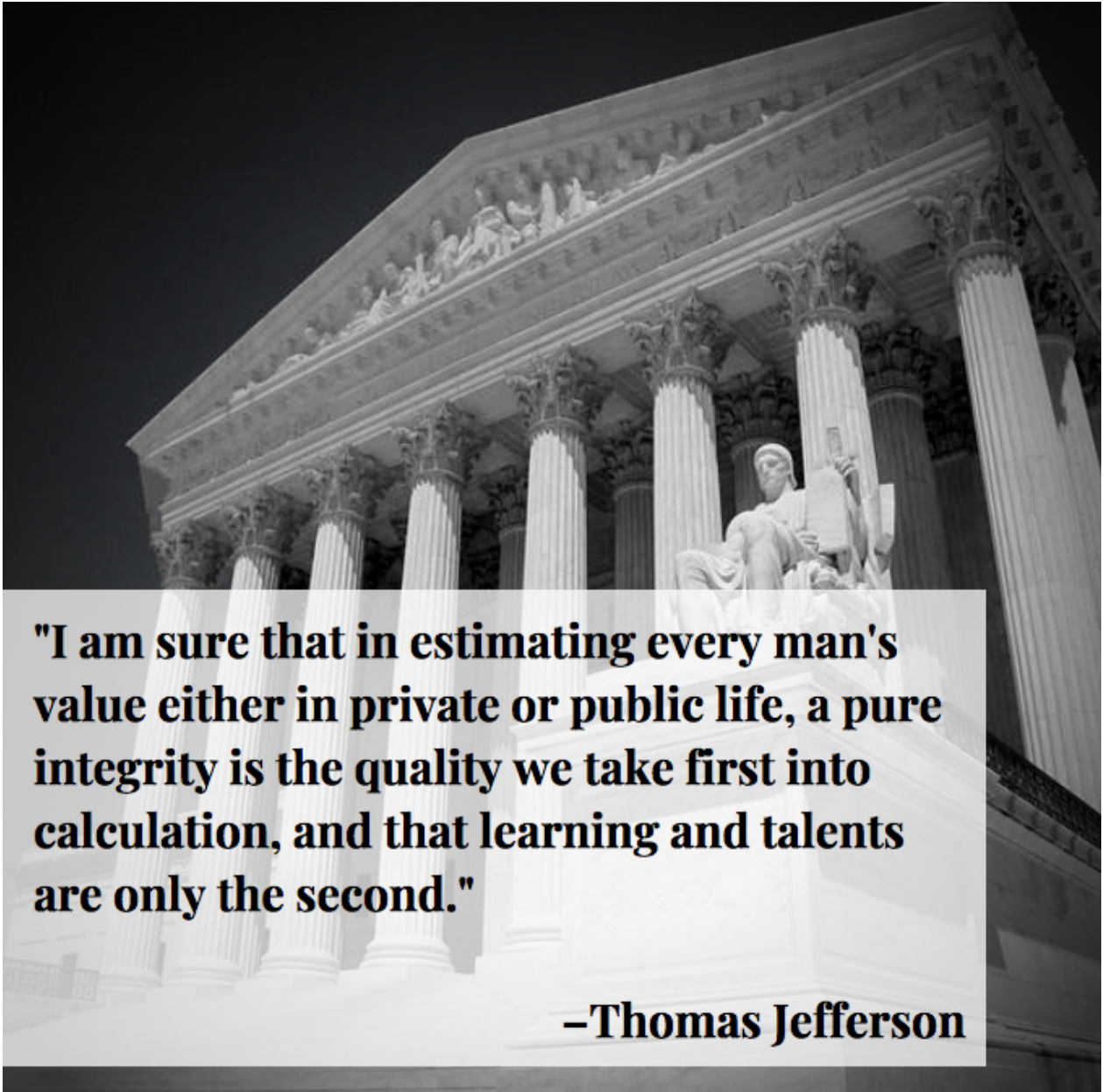
Executive Leadership and Board of Directors

The GLA’s Executive Leadership Team (“AELT”) is responsible for setting and reinforcing a culture of ethical behavior and compliance. The AELT ensures that all employees are trained and meet the ethical standards laid out in the Code of Business Conduct and Ethics, and holds them accountable for compliance.

AELT members monitor risks and issues to inform changes needed in policy and practice. The General Counsel is a member of the AELT and has a direct reporting line to the Chair of the GLA’s Board of Directors. The Board oversees the GLA’s Global Ethics and Compliance Program and ensures it is appropriate and effective. It ensures that GLA employs best practices, benchmarked against other firms, and promulgates up-to-date policies and procedures in response to evolving risks and regulations.

The fact that most members of the Board are external to the GLA contributes to its independent perspective. The ECO and head of Internal Audit report regularly to the Finance, Audit and Compliance Committee and the full Board of Directors.

INTEGRITY



"I am sure that in estimating every man's value either in private or public life, a pure integrity is the quality we take first into calculation, and that learning and talents are only the second."

-Thomas Jefferson

Integrity

GLA team members are expected to do the right thing, the first time. The following are examples that help illustrate what integrity means. This is not an exhaustive list, but a guide to help you conceptualize and spot issues. When in doubt, please ask!



Fraud Prevention

Fraud is falsifying or withholding information for personal or financial gain. Examples include but are not limited to:

- ◆ Falsified travel vouchers, invoices, time sheets, receipts, or M&E data.
- ◆ Phony bids and multiple bids on a solicitation from a single vendor (related parties).
- ◆ Inflated performance numbers.
- ◆ False certifications or information on qualifications.
- ◆ False property records.
- ◆ Substitution of products, such as inferior quality or material.
- ◆ GLA purchases diverted for personal use.

The GLA's policies, procedures, and professional management of staff are designed to minimize vulnerability to fraud in financial transactions, results reporting, grant awards, and the procurement of goods and services. You are responsible for assisting the GLA to help mitigate fraud including but not limited to:

- ◆ Overseeing financial, procurement, and grant-related transactions to ensure the accuracy and completeness of information;
- ◆ Ensuring documentation in support of approvals is accurate and complete;
- ◆ Asking questions regarding documents, justifications, and performance, especially when you suspect inconsistencies;
- ◆ Independently verifying information or spot-checking information in quotations/bids;
- ◆ Monitoring and independently verifying performance of service or appropriate delivery of equipment/supplies according to the terms of the subcontract or award;
- ◆ Assuring physical control and inventory of physical assets;
- ◆ Regularly assessing risks and revising policies and procedures as necessary; and
- ◆ Completing ethics training, regularly discussing ethical issues with direct reports, and sharing best practices and concerns to reinforce an organizational culture of ethical behavior and compliance.

Preventing Bribery and Corruption

You must avoid any activity that would breach the United States Foreign Corrupt Practices Act (“FCPA”), the U.K. Bribery Act (UKBA), local law, or international standards of best practice. You are responsible for assisting the GLA to prevent bribery and corruption:

- ◆ **Bribery.** Do not directly, or indirectly, solicit, accept, offer, promise, or give a bribe or other improper payment, gift, favor, or hospitality to obtain or retain business, approvals, or other improper business advantage.
- ◆ **Facilitation Payments.** Do not make small payments to “grease” approvals or actions on the part of government officials. Facilitation payments are prohibited under the UKBA. Under certain circumstances, the GLA may pay for the commercial services of an expeditor to process goods through customs. The terms of reference in the associated contract must be explicit and must prohibit payments to “grease” approvals on the part of a government official.
- ◆ **Kickbacks.** Never ask for or accept anything of value from vendors, suppliers, or contractors who do business with the GLA. You may accept gifts and hospitality of nominal value (a meal offered during the course of a business meeting, for example, or a notepad with an organization’s logo on it).
- ◆ **Gratuities.** Never pay or provide gifts, favors, or hospitality to a government official after you receive a favorable action or decision.
- ◆ **Contributions.** Do not make contributions to candidates for public office or to political parties or other political organizations on behalf of the GLA. Personal contributions are permissible.
- ◆ **Hospitality, Nominal Gifts, and Honoraria.** GLA-approved advertising items of nominal value (pens, hats, tee-shirts, and so on), plaques, and certificates of recognition may be offered to government officials. Modest meals, refreshments, and non-alcoholic beverages in accordance with local customs and practices are also allowed. However, in no event should the value of the courtesy exceed \$20 per person/per occasion or \$50 per person annually. Honoraria to host government officials must be nominal and occasional for work outside normal duties and working hours to avoid conflicts with official duties.
- ◆ **Awareness.** Promote training and practices that raise awareness among our business partners of the global efforts to combat bribery and corruption.
- ◆ **Training.** Take annual training and participate in supplemental reviews and meetings so that you are fully aware of the nature and indicators of bribery, facilitation payments, kickbacks, and gratuities.

Preventing Conflicts of Interest – Unfair Advantage

GLA plays by the rules. We take pride in competing fairly and performing top-quality work, untainted by conflicting roles or unfair advantages. Appearances are important when anticipating and managing a conflict of interest. Your intuition is a useful guide in how to respond to possible bias or an unfair advantage. Act immediately so that quick action can be taken to limit any conflict or appearance of a conflict. You are responsible for assisting the GLA to prevent conflicts of interest based on unfair advantage by:

- ◆ Assuring that our professional judgments or technical assistance are not influenced by any economic interests that the GLA, its subcontractor, or employees may have. Examples of economic interest include having a direct family relationship with a company or the employee of a company that may benefit from our actions, owning or partially owning a firm, organization, or other entities engaged with the GLA, or serving on the Board of a potential bidder or applicant.
- ◆ Refraining from seeking out non-public, procurement-sensitive information, such as government budgets or terms of reference for a solicitation. If such information is inadvertently received, immediately restrict access to it and inform the Ethics and Compliance Officer.
- ◆ Avoiding the design or development of statements of work or terms of reference pertaining to solicitations for which we will be competing.

Preventing Conflicts of Interest – Bias

The GLA's success depends upon our ability to make objective, prudent decisions, and to act with integrity. An actual or apparent conflict of interest occurs when an individual's personal interest biases his or her professional judgment.

You must not put yourself in a position where decisions or actions could be influenced by outside employment/directorships, or close personal or family relationships. You are responsible for assisting the GLA to prevent conflicts of interest based on bias by:

- ◆ Ensuring that your professional judgments or assistance are not influenced by financial interests, personal activity, or family, business, or personal relationships.
- ◆ Disclosing and preventing personal conflicts of interest when you have family, business, or personal relationships with an applicant, bidder, offeror, or awardee. After you have disclosed any such interest, GLA management will intervene to limit or avoid the appearance of a conflict of interest.
- ◆ Disclosing, at initial employment and thereafter, any interests and relationships that might affect or appear to affect your professional judgment.

- ◆ Notifying your supervisor immediately if a member of your family or someone with whom you have a close personal relationship (friendship) is applying for a job or submitting a proposal or grant application to the GLA. The supervisor, in consultation with project management, will take appropriate action to screen you from reviews, recommendations, supervision, or oversight of the related individual, business, or organization to avoid the conflict or appearance of a conflict.
- ◆ Avoiding any direct or indirect financial interests with any competitor, supplier, or current or potential customer. Exceptions to this rule include minimal, passive investments or those based on pre-existing relationships between you and the organization in question, as long as they do not create a conflict or the appearance of a conflict of interest, as determined by the Chief Ethics and Compliance Officer.
- ◆ Obtaining approval before beginning outside employment, business, or consulting engagements with another company while employed at the GLA; also, obtaining advance approval to become a board member of a business or organization.

Promoting Competition & Transparency in Procurement

In soliciting for equipment, supplies, and services, we promote fair competition to ensure that GLA and its clients obtain the best value for money and are best positioned to achieve the smooth implementation of development projects.

We treat vendors, subcontractors, consultants, and awardees fairly, in accordance with GLA values. GLA policies and procedures are designed to quickly and fairly select those vendors, subcontractors, and other implementing partners most likely to succeed, considering price, quality, and ability to deliver.

The GLA's procurement process includes opportunities for vendors and offerers to ask questions about the solicitation and to report concerns to the Chief of Party/Team Leader, ECO, or via the ethics Alert System (globalcompliance@globallibertyalliance.org). Effective management of solicitations—with clear prohibitions on kickbacks, bribes, or conflicts of interest—strengthens the relationship with our vendors and subcontractors. Such practice sets a standard for fair competition and good-faith dealings that is essential to effective contracting. Contact Mr. Mauricio Tamargo at the GLA in Alexandria, Virginia or project support team for guidance on best practices and procurement policies.

In addition, the GLA complies with all applicable fair competition and antitrust laws. These laws attempt to ensure that businesses compete fairly and honestly and they prohibit conduct seeking to reduce or restrain competition. If you are uncertain whether a contemplated action raises unfair competition or antitrust issues, contact the GLA's General Counsel.

Making the Right Decision, Document It

Ethics is the foundation of successful performance. While it may sometimes appear tempting to take short-cuts for the sake of expediency in the pursuit of project goals, this can be avoided with timely and proper project planning. If you are confronted with an urgent problem that appears to necessitate making an exception to a GLA policy, immediately consult with your senior managers and the Project Chief of Party/Team Leader. Do not delay in documenting the reasons for the policy exception, making sure to describe the issue, circumstances, and outcome of the decision.

Protecting Information and Data

You must be vigilant in protecting proprietary and confidential information obtained in the performance of the GLA's work. Any information which, if released, would have an adverse impact on an individual's privacy or a business/organization's competitiveness, or on client programs or their foreign relations, is considered proprietary or confidential and must be controlled and restricted.

Examples of proprietary or confidential information include non-public procurement-sensitive information, financial reports, financial performance documents, financial plans, medical and personal information, and GLA proposal details.

You may not disclose any non-public information related to the client, implementing partners, or beneficiaries for any reason. If you need to send confidential information outside the GLA, senior management approval or a non-disclosure agreement (available from the General Counsel) may be needed.

Handling Non-Public, Procurement-Sensitive Information

Fair procurement competition requires a level playing field in which no firm has an unfair advantage by virtue of having more information or better access to information than competitors. Good procurement practice requires that all potential bidders/offerers have the same information to prepare well-informed and responsive proposals.

Unfair receipt of information or access to data—such as GLA budget estimates, procurement plans, bids and bidders, and other non-public information—distorts the solicitation process and may result in an inappropriate award. Accordingly, you must control procurement-related information internally so that its release is managed fairly and appropriately.

You must also be aware that receipt of non-public, procurement-sensitive information from potential clients may also give the appearance of an unfair advantage, which may in turn jeopardize GLA's eligibility to compete on solicitations.

If you receive information on funding levels, program design documents, draft solicitations, or other procurement-sensitive information that is not publicly available, do not forward it within GLA. Immediately contact your supervisor, Chief of Party/Team Leader, or the ECO to discuss next steps.

Complying with International Trade Sanctions and Export Controls

Carrying and sending goods from one country to another is subject to the customs laws of the transit nations. Certain goods—such as electronic equipment, software, food products, chemical substances, and valuable items—can be subject to heightened customs and export controls.

When you carry or ship items abroad on behalf of the GLA, consult with your team leader to ensure that all of the equipment you intend to use on the trip is vetted for export controls. Make sure you only carry or ship goods abroad if you are sure there are no restrictions at either end of your itinerary.

There are certain high-risk nations that require senior management approval before any transactions are undertaken including all nations subject to economic sanctions by the United States. There are also high-risk persons who are sanctioned under various U.S. laws and regulations. GLA members must check with the General Counsel before engaging in any transactions with persons in nations subject to U.S. economic sanctions.

Exercising Due Diligence

Individuals, companies, and organizations are subject to restrictions from various governments. You play an essential part in how the GLA manages projects, and that responsibility entails ensuring the eligibility and responsibility of subcontractors, consultants, or grantees. To qualify as responsible, a firm or organization must have the technical capacity, experience, and ability to perform and finance the assigned work (or must be able to obtain the necessary capacity and financing) given its current workload.

It must further have adequate accounting and operational controls; a satisfactory record of performance, integrity, and business ethics; and must be otherwise qualified and eligible to receive an award under applicable laws and regulations. Part of the eligibility determination may include vetting information against established Government and International Organization (e.g., U.N.) web-based databases.

It is our responsibility to comply with these requirements to prevent engagement with terrorists, drug traffickers, criminals, and other prohibited entities. Failure to exercise due diligence can result in significant penalties and may damage the GLA's ability to win future projects. Contact the GLA's General Counsel if you have questions.

Cooperating with Audits and Investigations

Audits and investigations are an important oversight responsibility of the GLA and our clients. You are expected to cooperate with audit and investigation efforts and provide timely and reasonable access to personnel for interviews and documents for review.

When contacted by an outside auditor or investigator, please notify your supervisor, senior management, human resources (HR), or your Project Chief of Party / Team Leader, and the General Counsel.

Note that requests for information by an outside auditor or investigator must be made in writing so that the GLA may track the request and the disposition of the information. Copies of original documents can be provided to auditors or investigators for review of information outside of GLA's premises, if coordinated through Internal Audit.

Anti-Human Trafficking, Dignity of the Individual

We believe all individuals must be treated with dignity, fairness, and respect, and we are committed to upholding fundamental rights. This is part of our core GLA Mission.

GLA will only engage with vendors, suppliers, consultants, subcontractors, and clients who demonstrate a serious commitment to the health and safety of their workers and operate in compliance with human rights laws.

GLA does not use or condone the use of slave labor, nor will we tolerate the procurement of commercial sex acts or any other form of human trafficking, nor the degrading treatment of individuals, including their employment in unsafe working conditions.

Any GLA employee, vendor, supplier, consultant, or subcontractor that engages in any form of human trafficking is subject to termination. Immediately contact your supervisor, Chief of Party/ Team Leader, or Ethics and Compliance Officer if you suspect you have witnessed any form of human trafficking.

Child Protection

There may be occasions when children may come into contact with our work. GLA holds that all children must be protected from abuse, neglect, exploitation, and violence. The welfare of the child always comes first. You must be familiar with this policy and raise concerns to your supervisor or Chief of Party/Team Leader if you believe a child is being abused, neglected, or exploited.

Political Activities

GLA does not fund political contributions, in cash or in kind, anywhere in the world. This prohibition includes support of political activity, political parties or their representatives, political campaigns, and candidates or any of their affiliated organizations.

You have the right to engage as an individual in the political process and make political donations, as long as you do not represent that GLA is making the contribution and provided there is no conflict of interest involved.

Any questions or concerns about political activities may be directed to your supervisor, Project Chief of Party/Team Leader, HR, or the General Counsel.

Gifts and Entertainment

GLA employees, members of our families, and GLA subcontractors must comply with the Foreign Corrupt Practices Act, the U.K. Bribery Act, and local anti-corruption laws in not giving or offering gifts (including equipment, money, unusual discounts, or favored personal treatment) to government officials for the purpose of receiving approvals, government services, or obtaining or keeping business.

Communicating with Media and the Public

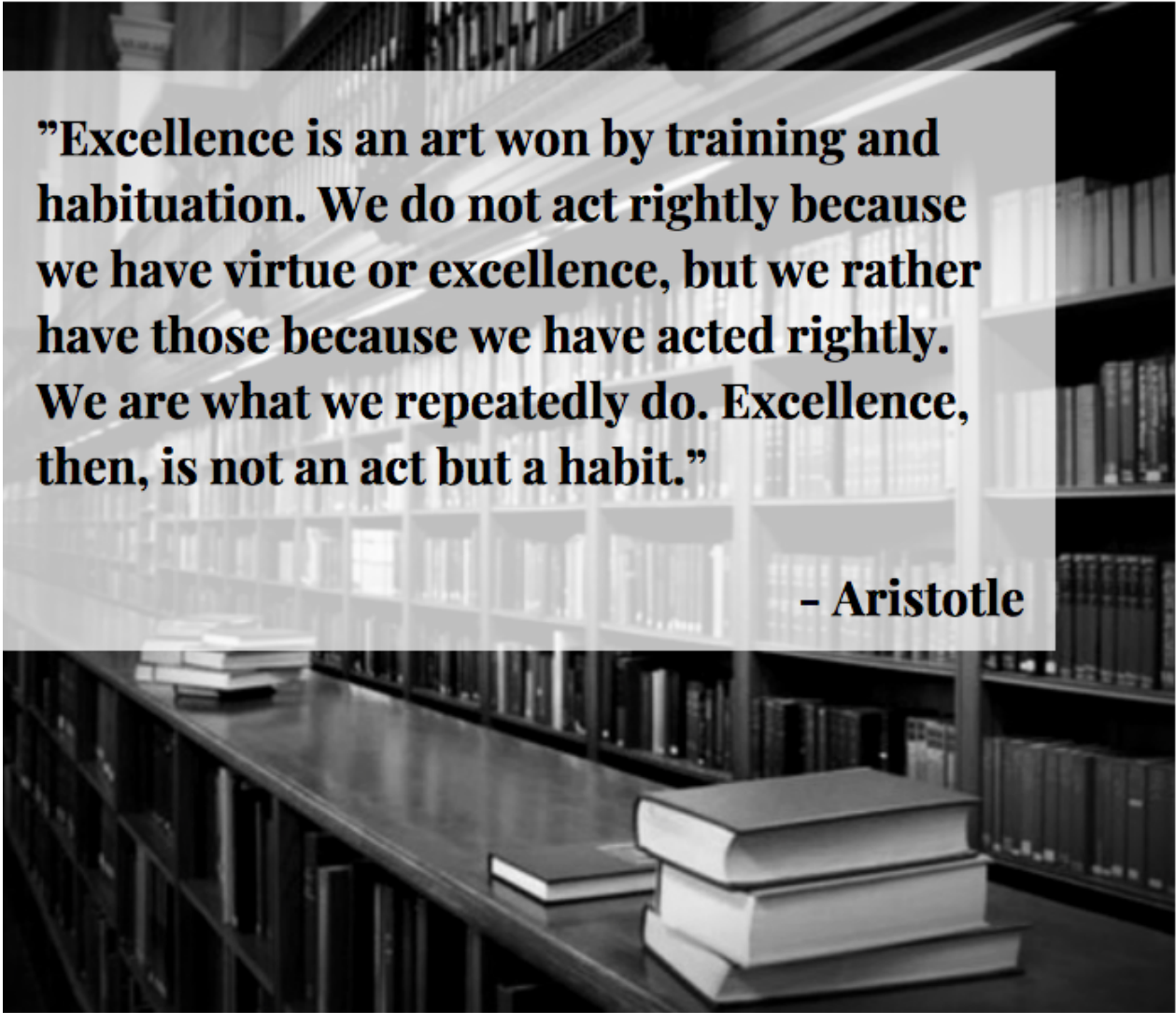
If you are contacted by a member of the media, please refer the individual to the head of GLA Communications, who coordinates GLA's relationship with the news media and the public. If you have questions about your use of social media and how it might affect GLA, please contact Mr. Mauricio Tamargo or the General Counsel.

Using Information, Email, and Social Media Responsibly

GLA uses global electronic communications and resources as a routine part of business activities. Do not use electronic media to initiate, save, or send items that are hostile, harassing, offensive, threatening, or inappropriate; to initiate, save, or send chain letters or other widespread non-business distributions; or to initiate or participate in any malicious, unauthorized, or fraudulent use of company resources.

Avoid soliciting for commercial, charitable, religious, or political causes and interfering with or disrupting network users, services, or equipment. Gaining unauthorized access to databases or information sources or damaging computer equipment, software, or data are grounds for termination.

EXCELLENCE



“Excellence is an art won by training and habituation. We do not act rightly because we have virtue or excellence, but we rather have those because we have acted rightly. We are what we repeatedly do. Excellence, then, is not an act but a habit.”

- Aristotle

Excellence

Ensuring Quality

GLA is committed to achieving the highest technical and professional standards. We ensure that services performed and products provided meet or exceed the quality specifications in contracts and other customer agreements by establishing and monitoring oversight systems, maintaining substantiating evidence, documenting authorizations and approvals, and conducting training and regular reviews of performance.



Managing Client Relationships

Maintaining a constructive and collaborative business relationship with GLA clients is essential to our success. You are expected to assist in this process by responsibly managing contractual, legal, policy, and professional matters, and meeting all ethical requirements.

Our clients rely on us for appropriate solutions and responsible management of their resources. You should bring to the immediate attention of senior managers any concerns raised by client representatives so that we can take control of the issue and respond appropriately.

Acknowledgment

_____ Annual Certification _____ First Time Certification

I hereby acknowledge receipt of the Global Liberty Alliance Code of Business Conduct and Ethics manual. I am either aware of the location of the Compliance Manual should I need to access it or agree I will keep the Code of Business Conduct and Ethics manual for further reference. I represent that I have read and understood all the provisions in the Code of Business Conduct and Ethics manual and agree to abide by and accept the policies and procedures contained herein.

I understand, acknowledge and agree that all the provisions of the GLA Code of Business Conduct and Ethics apply to me and, among other matters, to all securities transactions and holdings in investments in which I or members of my family/household have beneficial ownership. By signing this certification, I hereby acknowledge that I have at all times, and will continue to be, in compliance with both the spirit and the specific requirements of all of the provisions of GLA's Code of Business Conduct and Ethics. I have, and will continue to:

1. Notify GLA promptly of all complaints received;
2. Notify GLA timely, accurately and completely of all disciplinary history required by the Firm's policies;
3. Inform GLA of all outside business activities;
4. Not engage in any activities which would violate GLA Code of Business Conduct and Ethics

_____ Printed Name
_____ Signature
_____ Date

GLA Acknowledgment of Receipt

_____ Printed Name
_____ Signature
_____ Date