

COMPLIANCE & CODE OF CONDUCT POLICY

The Company values its reputation and is committed to maintaining the highest level of corporate and ethical standards in the conduct of its business affairs. We recognise the essential role that compliance - with applicable regulatory and legal requirements - plays in the governance and sustainability of our business, and to this end will ensure our business is conducted in accordance with these requirements.

Our foundations are built on core values which guide our actions to ensure all our business transactions are conducted in a socially moral, responsible and ethical manner. We respect and follow the law, protect the environment and support universal human rights.

STATEMENT

Scope

This policy, documented procedures and guidelines are designed to establish a centralised mechanism to track and ensure compliance with all applicable laws in all countries in which the Company operates. This Policy does not discriminate at any level and applies equally to all persons who have an association with the Company. Any violation to this policy, associated documented procedures or failure to report any violation may lead to disciplinary action or legal consequence.

Code of Conduct

Our Code of Conduct is a statement of ethical and compliance principles that guide our daily operations. The Code of Conduct also establishes how we expect management, employees, and agents to act in accordance with law and applicable Company policies, procedures and guidelines. In brief, all persons who have an association with the Company are;

- Prohibited from offering, promising or paying a bribe of any kind.
- Prohibited from soliciting, accepting or receiving a bribe of any kind.
- Prohibited from giving or offering anything of value to a public official.
- Required to comply with the Company's guidelines in relation to the giving and receipt of gifts and hospitality.
- Prohibited from making or receiving facilitation payments.
- Required to perform due diligence for agents, representatives, suppliers, contractors, joint venture partners and all those with whom a business relationship is established in order to enable the Company to offer its services to its clients.

Training

We are committed to communicating our standards, policies, procedures and guidelines to our employees. We provide education and training to new and current employees on a variety of compliance-related topics.

Continuous Improvement

This Policy is reviewed annually by Senior and management in implementing appropriate compliance management policies and procedures; in awareness training; in assessing and monitoring the Company's compliance practices; in assisting to implement strategies that reinforce a safe, transparent and ethical working environment; and in ensuring consistent management of policies, standards and procedures in place.

The prevention, detection and reporting of bribery, corruption or non-adherence to documented policies, procedures and guidelines is the responsibility of all employees. If you become aware or suspect that an activity or conduct which is proposed or has taken place is a bribe or corrupt, then you are advised to inform the Managing partner. This Policy was approved by the Managing Partner on 22.05.2021.

