

Code of Ethics for Business in Kenya

Letter of Commitment & Engagement

As a company doing business in Kenya, and in my capacity as the CEO/Chairman of

PAVICON KENYA LIMITED

(please write name of company),

I hereby express my company's voluntary will and commitment to:

(Please tick applicable box):

Support and implement the Code of Ethics for Business in Kenya as per category 1	<input checked="" type="checkbox"/>
Support and implement the Code of Ethics for Business in Kenya as per category 2	<input checked="" type="checkbox"/>

In order to demonstrate our commitment to this Code in the Category chosen, we shall endeavour to do the following:

- 1) Our company and its entire staff will aspire to live up to the Code and adhere to the requirements as set out in the applicable category of engagement;
- 2) We shall demonstrate visible and active commitment to the implementation of this Code;
- 3) We shall base our Company policies on the Code and provide leadership, resources and active support for implementation of the Code;
- 4) We shall dedicate resources towards achieving the aspirations of the Code; Further, we shall ensure that the company Code of Ethics and ethical internal control and operation mechanisms serve to strengthen this Code;
- 5) Our enterprise shall ensure that subsidiaries, joint ventures, and branches over which we maintain effective control subscribe to ethical business. Where we do not have effective control we shall make known our ethical policy and use our best efforts to monitor that the conduct of such subsidiaries, joint ventures and branches is consistent with the Code;
- 6) Our business enterprise shall make known its ethics and anti-bribe policies to contractors and suppliers;
- 7) We shall make it mandatory that all known instances of corruption are reported to the relevant authorities.

This letter of commitment will be renewed annually with communication to the GCNK secretariat:

JOSEPHINE NSURGI

Full name

CHIEF EXECUTIVE OFFICER

Designation



Signature

PAVICON KENYA LIMITED

Name of company/organization

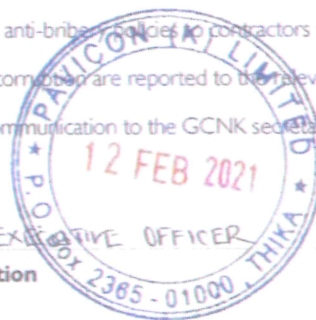
12/02/2021

Date

Witnessed By (~~GCNK~~, KAM, KEPSA) by:

JUDY NJIRO - EXECUTIVE DIRECTOR

Signature:

Adherence to the Code Of Ethics

A company commits to the Code of Ethics by signing this Letter of Commitment and Engagement.

Levels of Engagement:

Category 1: ADHERE: In the **first year** following their commitment to the Code of Ethics, companies are not expected to report on their adherence to the Code, but they have to:

- ◆ Aspire to adhere to the Code;
- ◆ Make it public that they have committed to the Code of Ethics (on website, in annual report or through the annual Communication on Progress report);
- ◆ Participate in seminars and workshops organised by the Global Compact Network Kenya (GCNK), Kenya Association of Manufacturers (KAM), Kenya Private Sector Alliance (KEPSA) and Federation of Kenya Employers (FKE).

Category 2: INTEGRATE and REPORT: From the **second year** after committing to the Code of Ethics, a company will publicly report on its progress with regard to the implementation of the Code. The company will also make its report available to the GCNK Secretariat. In this report, the company will indicate:

- ◆ How it has applied and integrated the Code within the company;
- ◆ Progress it has made with implementing an internal ethics and anti-corruption management programme (e.g. ethics and corruption risk assessment, top level commitment, policies and procedures, effective implementation, training, awareness, monitoring and review);
- ◆ Whether its report has been externally audited (which is optional).

In addition, a company will:

- ◆ Visibly promote responsible business conduct and convince other companies to also commit to the Code of Ethics; and
- ◆ Participate in seminars and workshops organised by Global Compact Network Kenya.

A company may immediately start adhering to the criteria under 'INTEGRATE and REPORT' from year 1, but will only have to start reporting from year 2.