

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

BASE TITANIUM 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	
Support and implement the Code of Ethics for Business in Kenya as per category 2	✓

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-bribery 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 :

TIM CARSTENS

Full name

MANAGING DIRECTOR

Designation

[Signature]

Signature

BASE TITANIUM LIMITED

Name of company/organization

14-JAN-16

Date

Witnessed By (KAM/KEPSA): Name: CAROLE KARUKU (CEO)

Signature: [Signature]

