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Lytton Springs Limited (Kenya) Anti-Corruption Policy

1. Zero tolerance towards corruption

In the Lytton Springs Limited, we are determined to maintain the highest standards of integrity and work ethics among our staff and across all areas of activity. We therefore maintain a policy of **zero tolerance** towards corruption in all its forms. Our staff are in contact with numerous other public organizations, NGOs, ordinary citizens, commercial companies and other counterparts all over the country. Our company actively supports the international fight against corruption and advises partners and employees on how to avoid corruption.

This Anti-Corruption Policy and its Code of Conduct are applicable to all staff working in the company. Its purpose is to ensure and support behavior and work ethics characterized by the highest standards of personal and organizational integrity, both internally and externally with our many different clients. It also provides guidance to staff on their required conduct when confronted with corruption, corrupt practices or corrupt propositions, and when working to prevent corruption.

2. What is corruption?

Corruption is defined as the misuse of entrusted power for private gain. It affects everyone whose life, livelihood or happiness depends on the integrity of people in a position of authority, it threatens the stability and security of societies, and it undermines democratic institutions and values.

Corruption is best known in the form of bribery, fraud, embezzlement or extortion. However, corruption does not exclusively involve money changing hands; it may also include providing services to gain advantages, such as favorable treatment, special protection, extra services or quicker case processing.

3. Anti-Corruption Code of Conduct

All staff of Lytton Springs Limited will respect and promote the principles of the Code of Conduct presented below.

I. Conflict of interest

We will avoid any conflict – real or potential – between our personal interests and the interests of Lytton Springs Limited.

Conflicts of interest arise from situations in which a member of staff has a private interest that could potentially influence, or appear to influence, the impartial and objective performance of his or her official duties. Private interests include any advantage to oneself or one's family, close relatives, friends and persons or organizations with which one has or has had business or political relations. When faced with a potential or actual conflict of interest, staff are required to promptly inform their superiors.

II. Bribery

We will not give or accept bribery in any form.

Bribery is the act of offering, giving (active bribery), receiving, soliciting or accepting (passive bribery) something of value with the purpose of influencing the action of an official in the performance of his or her public or legal duties. Bribery is a criminal offence in Kenya.

III. Extortion

We will not for private purposes seek to influence any person or body by using our official position or by using force or threats.

Extortion occurs when an individual unlawfully demands or receives money or property through intimidation. Extortion may include threats of harm to a person or his/her property, threats to accuse him/her of a crime/illegal act, or threats to reveal embarrassing information. Some forms of threat are occasionally singled out for separate statutory treatment under the designation "blackmail."

IV. Fraud

We will not use deception, trickery or breach of confidence to gain an unfair or dishonest advantage.

Fraud is the use of deception with the intention of obtaining an advantage (financial or otherwise), avoiding an obligation or causing loss to others. This involves being deliberately dishonest, misleading, engaging in deceitful behavior, practising trickery or acting under false pretences. Fraud is a criminal offence in Kenya.

V. Embezzlement

We will not misappropriate or otherwise divert property or funds entrusted to us.

Embezzlement is the misappropriation or other diversion of property or funds legally entrusted to someone by virtue of his or her position. Embezzlement is a criminal offence in Kenya.

VI. Gifts

We will not give, solicit or receive directly or indirectly any gift or other favor that may be seen to influence the exercise of our function, performance of duty or judgement. This does not include conventional hospitality or minor gifts.

In the context of corruption, a gift is a financial or other benefit, offered, given, solicited or received in the expectation of receiving a benefit in return. Gifts and hospitality may be in themselves a manifestation of corrupt behavior. They may be used to facilitate corruption, or may give the appearance of corruption. Gifts may include cash or assets given as presents, and political or charitable donations. Hospitality may include meals, hotels, flights, entertainment or sporting events.

As a general rule, staff should not receive gifts or other advantages. However, in observing and respecting local hospitality conventions, small gifts may be accepted.

VII. Nepotism and favouritism

We will not favour friends, family or other close personal relations in recruitment, procurement, aid delivery, consular services or other situations.

Nepotism is favouritism shown to relatives or friends without regard to merit. Relatives or friends are treated favourably based on the close personal relationship alone rather than on a professional and objective assessment of their skills and qualifications.

VIII. Reporting corruption cases

We will report any evidence or suspicion of breach of this Code of Conduct.

All staff are obliged to familiarize themselves with the Code of Conduct and respect its principles. They are obliged to report any evidence or suspicion of breach of the Code to their superiors.

4. Openness and transparency is the rule

Maximum openness and transparency is essential when fighting corruption. Internally, the company ensures that all staff are familiar with the Anti-Corruption Policy through:

- A webpage on anti-corruption on the company's website.
- Internal instructions - e.g. regarding the company's gift policy.
- Relevant training and instruction.

5. Where and how to report corruption

Zero tolerance on corruption entails that all staff upon suspicion or awareness of specific cases of corruption involving other staff members, business partners, the company's clients and others with whom staff members cooperate, are obliged to immediately notify their superiors directly.

6. Implementation of the Code of Conduct

The staff of Lytton Springs Limited will regularly take part in relevant anti-corruption training.

The Code of Conduct is supplemented by existing and, as and when relevant, new guidelines and instructions targeted at specific policy areas. Hence the company is devoted to work actively to fight corruption.

7. Anti-Corruption Code of Conduct

- I. We will avoid any conflict – real or potential – between our personal interests and the interests of Lytton Springs Limited.
- II. We will not give or accept bribery in any form.
- III. We will not for private purposes seek to influence any person or body by using our official position or by using force or threats.
- IV. We will not use deception, trickery or breach of confidence to gain an unfair or dishonest advantage.
- V. We will not misappropriate or otherwise divert property or funds entrusted to us.
- VI. We will not give, solicit or receive directly or indirectly any gift or other favour that may influence the exercise of our function, performance of duty or judgement. This does not include conventional hospitality or minor gifts.
- VII. We will not favour friends, family or other close personal relations in recruitment, procurement, aid delivery, consular services or other situations.
- VIII. We will report any evidence or suspicion of breach of this Code of Conduct.

8. Ownership and Frequency of Review of this Policy Document

This policy document remains the property of Lytton Springs Limited, Kenya. The interpretation of this policy also resides with the company's Board of Directors.

This policy document shall be subject to review every three (3) years or as may be deemed necessary. All suggestions for review and/or amendments shall be forwarded to the company's Board of Directors for necessary action.

Although this document shall be hosted in the official website of Lytton Springs Limited, Kenya, the Management of the company and each employee shall ensure strict compliance with this policy.

9. WHISTLEBLOWING CONTACT DETAILS IN CASE OF A BREACH TO THIS ANTI-CORRUPTION POLICY

Phone number +254700 050 100/ +254722 100 120

Email address whistleblowing@lytttonsprings.co.ke

Staff Declaration

I have received the Lytton Springs Limited Anti-Corruption Policy, which I have read and understood.

NAME:-----

STAFF NO:-----

SIGNATURE:-----

DATE-----

Please return this page to Human Resources Department.