

KAVALI CAPITAL LIMITED

CODE OF CONDUCT

Preface: A word from the Managing Director

Our clients are at the core of our business and we are motivated at all times to offer them reliable and dependable solutions that allow for improvement in quality and productivity of businesses.

This Code of conduct and Ethics for Kavali Capital Limited, sets out standards of behavior for all staff, employees, directors, business partners and in the Uganda Public Service.

It is designed to ensure the impartiality, objectivity, transparency, integrity, efficiency and effectiveness, and customer centered approach of all it's applicable to when performing their duties. It is intended to guide our staff, management, and business partners in their behavior and how they relate to each other and our customers.

This document is a declaration of our commitment to maintaining the highest standards of ethics and integrity in all that we do. As you've heard may have heard or already know organizations look at what you do, not what you say, as a true indication of who you really are.

Further, integrity, truly the core to our Code of Conduct, or said differently, doing the right thing even when no one is looking, is the greatest personal attribute a leader can possess. This means always making the "hard right" versus "easy wrong" decisions. Our work is not a popularity contest, and whether someone "likes" you or not is unimportant. Without integrity, respect and trust, we will never succeed. Adherence to the Code of Conduct enables us to deliver outstanding products and services while meeting our ethical obligations. The Code of Conduct applies to each of us, and we all must strive to understand it and follow it.

In essence, this Code of conduct and Ethics shall be imbued to unite us all around one set of values that guide our daily decisions and actions to promote integrity, reliability, dependability, transparency and accountability in the company and improve the image of Kavali Capital Limited.

All directors, officers, employees, agents, suppliers, and business partners are enjoined to conform to this Code of conduct and promote its observance. Likewise, customers of the Kavali Capital Limited and the general public are encouraged to access the Code of conduct and report any behavior by any such person(s) bound by this code that breach this Code.



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YUSUF SSERUNKUMA
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Managing Director.

ABOUT US:

Kavali Capital Limited is a client centric supply company that is serving our clients with excellence in meeting their unique needs. Kavali Capital Limited meets the requirements of the clients from end-to-end

We are committed to supporting our clientele through every step of the supplies and forwarding supply chain - from: consulting, concept development, planning, management, control, and execution to realization of all objectives.

The concept of forwarding may seem complex but at Kavali Capital Ltd Systems, we ensure that the management of the consignment, warehousing, processing, deployment, transportation.

Our execution methodology aids clients in their quest for improved business processes, improved productivity and quality.

At Kavali Capital Limited, our services are not just be spoke to suite our clients' needs, but we render them with diligence and passion. Because we have our clients at heart, we endeavor to be responsive and proactive at all times.

OUR VISION

To offer our customers the very best products and services.

OUR MISSION

To be a company that best understand and satisfies the customers.

To accomplish this, we pledge to:

- ✓ Deliver higher quality service to our clients
- ✓ Customize our service to suite our clients' needs
- ✓ Communicate and deal with our clients with the utmost honesty and transparency
- ✓ Be receptive to the concerns and needs of our clients
- ✓ Continuously build the capacity of our staff to enhance service delivery through use of technology
- ✓ Stay one step ahead of our clients by anticipating their needs

OUR PROMISE

To treat every customer as if they're our only customer.

OUR VALUES

Integrity

Reliability and Dependability

Objectivity

Competence

Confidentiality

Professionalism

APPLICATION OF THE CODE

Our Code of Conduct (Code) applies to all directors, officers, employees, and agents of Kavali Capital Limited. We must all strive to follow this Code — in other words, to do the right thing under all circumstances. Although the Code does not cover every possible ethical scenario and or law, by following the Code and other Company policies and procedures, by adhering to the letter and the spirit of all applicable laws and regulations, and above all by applying sound judgment to your activities, you demonstrate your commitment to our Company values.

We will provide training on the Code and on other compliance subjects from time to time.

INTERPRETATION:

In this Code, unless the context otherwise requires:-

- a) **Bribe:** Means any gratification as an inducement to or a reward for or otherwise on account of any public officer for doing or forbidding to do anything in respect of any matter or transaction whatsoever, actual or proposed in which the Kavali Capital Limited (the Company) is concerned. It is anything offered or given to or given out by any such person(s) who is bound by this code, to gain favor and influence in a particular case.
- b) **Code:** Means the Kavali Capital Limited Code of conduct
- c) **Conduct:** Means behavior, attitude and character exhibited by any such person(s) who is bound by this code, within and outside the working environment
- d) **Conflict of interest:** Refers to a situation where a by any such person(s) who is bound by this code, has got to make a decision between his or her personal interest, public interest, and or the Company's interests.
- e) **Customer:** Means a person, whether external or internal, whom a by any such person(s) who is bound by this code, serves or interacts with in the course of his or her official duties for the Company.
- f) **Employer:** Means the Kavali Capital Limited.
- g) **Ethics:** Means a Code of morals applicable in the Company.
- h) **Family Member:** Means a Spouse, biological children or legally adopted children of any such person(s) who is bound by this code.
- i) **Gift:** Means any present, donation, grant or favor whether monetary or in kind or any other gain of a personal nature given as an appreciation after a service has been rendered or as the case may be.

- j) **Sexual Harassment:** Means conduct of a sexual nature that affects the dignity of women and men, which is unwelcome, irritating, unreasonable and offensive to the recipient. Such a conduct may be explicit, verbal or non-verbal or implicit and creates an intimidating, hostile or humiliating working environment or place of business for the recipient or customer.

GUIDING PRINCIPLES OF THE CODE AND WORK ETHICS

This Code is based on the following principles: - Accountability, Decency, Diligence, Effectiveness, Efficiency, Integrity, Loyalty, Professionalism, Transparency, and Confidentiality.

1) Attendance to duty

- a) Any such person(s) who is bound by this code shall observe the official working days and time of work when called upon.
- b) Any such person(s) who is bound by this code shall without exception perform his or her duty in a manner that conveys professionalism, respect and conforms to morally accepted standards.
- c) Any such person(s) who is bound by this code and in position of authority shall exercise such authority with due diligence and trust and shall demonstrate a high standard of Performance of duty and conduct.
- d) Any such person(s) who is bound by this code shall set clear standards of performance that customers can reasonably expect together with those that the company shall demand of them.

2) Time management

- a) Any such person(s) who is bound by this code shall have strict regard to the working hours and is strongly discouraged from late coming or any untimely behavior.
- b) Any such person(s) who is bound by this code shall endeavor to accomplish his or her tasks on time. He or she shall desist from engaging in behavior or conduct that disrupts or interferes with the work of others, such as, but not limited to: -
 - i. Being lazy and idle at work.
 - ii. Full time reading newspapers, keeping the radio loud as to disrupt concentration, playing computer games or surfing the Internet irresponsibly, and engaging on social media while at work.
 - iii. Transacting private business in office and during office hours.
 - iv. Engaging in private conversation and gossip during working hours.

- c) Unless otherwise stated, the official working hours are:- Monday – Friday: 8.00a.m – 5.00p.m with acceptable inclusive of lunch breaks and any such breaks the management shall schedule and or deem acceptable during the course of the day or week.

3) Absence from work or duty station

- a) Any such person(s) who is bound by this code shall seek and obtain permission from his or her supervisor to be absent from duty. Permission shall not be unreasonably denied or granted.
- b) Any such person(s) who is bound by this code shall, during official working hours, report his or her absence from office to his or her immediate supervisor or relevant persons.
- c) The Company shall from time to time make further directives on the same as it may deem fit without violating the Employee's rights.

4) Sexual Harassment

- a) A person(s) who is bound by this code shall avoid unethical and unbecoming behavior such as use of rude, abusive and obscene language, indecent dressing, hard supervision and sexual suggestive gestures which constitute sexual harassment and hence a violation of human rights.
- b) A person(s) who is bound by this code shall not subject others or be subjected to conduct of a sexual nature affecting his or her dignity, which is unwelcome, unreasonable and offensive to the recipient.
- c) A sexually suggestive and offensive behavior may manifest itself in such forms:
 - i. An employee being forced to choose between acceding to sexual demands or losing job benefits (sexual blackmail).
 - ii. Verbal and non-verbal sexually offensive behavior exhibited by colleagues (or even customers).
- d) A person(s) who is bound by this code, who is subjected to sexual harassment overtures shall report such a case with the adduced evidence, where applicable, to the immediate supervisor and or any other such designated member of the Management of the company that is responsible for investigating with a view to obtaining redress.
- e) The Managing Director shall be charged with appointing the requisite team or employee to investigate and handle these complaints of sexual harassment.

Any such complaints shall be handled with the utmost urgency and confidentiality, and any person found guilty shall be immediately dismissed.

- f) The Company shall keep a register and record of these complaints.
- g) A person(s) who is bound by this code, who has lodged any complaint regarding sexual harassment using the established complaints procedure shall not be unduly victimized.
- h) Remedies for sexual harassment shall be those prescribed under the civil or criminal laws of Uganda.

5) Customer Care

- a) As a general rule the Customer shall be given priority and accorded the utmost respect and attention while interacting with our organization and its products and services.
- b) A person(s) who is bound by this code shall be quick to identify the needs of the customer and shall promptly inform the managers and or immediate supervisors of any such unforeseen needs or demands of the customers of such feed given by the customer.
- c) A person(s) who is bound by this code, shall serve customers with integrity, diligence, transparency, clarity, respect and courtesy with a view to ensuring customer satisfaction and enhancing the customer's experience while interacting with the Company's service and or products. . Therefore, any such person(s) who is bound by this code shall:-
 - i. Serve every customer in a professional manner in accordance with the set standards.
 - ii. Not discriminate or harass any customer and ensure that the services are available and applied equally to all.
 - iii. Accord courtesy, empathy and fairness to all customers with special attention to persons with disabilities, the aged, sick and expectant mothers.
 - iv. Respond to all customers' requests with promptness and clarity.
 - v. Uphold teamwork and enhance the customers experience for efficient service delivery.

6) Conflict of interest

- a) Our continued success depends upon the public's continued trust and confidence. They must be able to rely on the impartiality, integrity, reliability and dependability of all that we do. We should look to serve the customer with a view of furthering and bettering the company's brand and reputation as trust can be destroyed in an instant. Therefore, it is important to remember that even the appearance of a conflict of interest may be just as damaging to the Company's reputation as a real conflict.
- b) Accordingly, a person(s) who is bound by this code shall apply should avoid any relationship with people, businesses, associations, or political movements that might impair the proper performance of your job, responsibilities or appear to do so.
- c) Avoid actions or business relationships that might tend to affect your independent judgment with respect to dealings with any of our clients, operations, or any other business or individual.
- d) A person(s) who is bound by this code shall not engage in a profit-making occupation outside of your regular assignment with the Company, if this outside employment:
 - i. Competes with the Company or provides services and assistance to a competitor;
 - ii. Interferes with your assigned duties with the Company, such as requiring Company time, property or facilities to perform the duties relating to the outside employment, including, for example, making or receiving phone calls or electronic communications, handling correspondence or receiving visits from customers; or
 - iii. Diminishes your ability to devote the necessary time and competence to your duties with the Company.
- e) A person(s) who is bound by this code is expressly prohibited from holding any investment in any competing business organization or any supplier, subcontractor or client of the Company, except where management allows it and does not violate this code.
- f) Additionally, a person(s) who is bound by this code must neither enter into leases or other business transactions with the company nor directly or indirectly benefit personally from any purchase of goods or services made by the company without prior written approval of the Company's Managing Director or such person delegated in writing to do so.

- g) A person(s) who is bound by this code if found to be infringing this regulation shall be liable to disciplinary action.
- h) A person(s) who is bound by this code must not participate in the selection, award or administration of a contract or purchase order if a conflict of interest, real or apparent, would be involved.

For example, a conflict would arise when one of the following has a financial or other interest in the organization selected for the award of a contract or purchase order:

- i. an employee;
- ii. any member of an employee's immediate family;
- iii. an employee's business partner; or
- iv. any organization that employs or is about to employ any such employee, family member or partner.

(In short, you should not do anything that might create dual loyalties without first clearing such activities with the Company.)

7) Financial Credibility

A person(s) who is bound by this code shall not engage in any arrangement that would cause him or her financial embarrassment, e.g. bankruptcy, unpaid loans or debts, gambling, among others.

8) Communication of Information

All forms of communication shall be managed by the management or such person so appointed to do so for and on behalf of the company.

9) Proprietary information, Confidentiality, and secrecy

- a) A person(s) who is bound by this code is a custodian of official information that comes into his or her possession in the course of his or her interaction or employment with the company. The release of such information must be authorized by the Managing director or guided by the laws relating to rights of access to information as prescribed in the Official Secrets Act, Data Privacy laws and other relevant laws that may be enacted from time to time.
- b) Any such person(s) who is bound by this code shall continue to maintain secrecy and confidentiality of official information even after he or she has left the Company. Such information shall not at any point in time be used against the company.

- c) Any such person(s) who is bound by this code shall not at any time engage himself or herself in loose talk and make unguarded statements.
- d) Most of the information that comes into the possession of any such person who is bound by this code, as part of your job, is a valuable asset of the Company and is likely considered proprietary. While you may think your daily tasks or access/use of information might be commonplace, they are not. This information is actually what gives the company the ability to compete and grow effectively and is Company property. Such proprietary, confidential and classified information (referred to as “confidential information”) includes:
 - i. strategic business plans;
 - ii. operating results;
 - iii. contract terms;
 - iv. marketing strategies;
 - v. client lists;
 - vi. personnel records;
 - vii. Company-developed software;
 - viii. blueprints;
 - ix. upcoming acquisitions and divestitures;
 - x. new investments and operating costs;
 - xi. processes; and
 - xii. methods.
- e) This confidential information remains the Company’s property even after person(s) who is bound by this code leaves the Company and, therefore, may not be disclosed to a new employer or any other unauthorized individual.
- f) Similarly, a person(s) who is bound by this code is expected to protect all confidential information you learned or obtained from previous employers. You should never use such confidential information on the job at Kavali Capital Limited and cannot disclose this information to Kavali Capital Limited personnel for any purpose.
- g) Our clients entrust us with their confidential and proprietary data, and we must protect their information. We have a right to use that data only according to the terms of our agreements with our customers. If a customer cannot trust us to protect the information they share with us, they will be unlikely to do business with us in the future.
- h) A person(s) who is bound by this code may never use material, nonpublic (Insider) information about the Company or its clients for our own personal financial benefit or the financial benefit of any other person. This behavior is unethical and a violation of the law and a violation of the company’s code. It is

equally unethical and unlawful to use for personal benefit any inside information about unrelated companies obtained in the course of your employment.

- i) Any such information is considered material if it is important enough to influence someone to buy, sell or hold securities.

10. Proper Use of Company Property / Assets

A person(s) who is bound by this code shall safeguard the company's property/assets entrusted to him or her and shall ensure that no damage, loss or misappropriation occurs in the process of procurement, storage, utilization and disposal.

11. Dress code and Appearance

- a) In order to promote, protect, foster and project a good image of the Company, a person(s) who is bound by this code shall at all times dress appropriately and appear decent and respectable in a way that is generally acceptable.
- b) A person(s) who is bound by this code on duty shall dress (whether in uniform or not) in a way which is compatible with the generally accepted standards in the community. Where there is need for a uniform the company shall provide the same and the same shall be worn during working hours, maintained and kept clean.

12. Bribes, Kickbacks, Gifts, Gratuity, Hospitality, Entertainment, Corruption and any other unlawful payments.

- a) A person(s) who is bound by this code or any member of his or her family shall not solicit or accept valuable gifts, presents, hospitality, gratuity or favor or other benefits, if he or she has reason to believe that the acceptance of such gifts, presents and or such other benefits is bound to influence his or her judgement, action or inaction while in service of the company to the detriment of the Company or for self-enrichment or otherwise against the company's will.
- b) Similarly, a person(s) who is bound by this code shall not give such gifts to influence the judgement or action of another person in his or her favors or the company's favor.
- c) A person(s) who is bound by this code who receives any gifts or other benefits as prohibited in above shall disclose that gift or benefit to the immediate supervisor and or management.

- d) A person(s) who is bound by this code may give a gift to a customer as a souvenir as long as the same has been sanctioned by management from time to time.
- e) A person(s) who is bound by this code and or a member of the who corruptly gives promises or offers any gift or present or reward or gratuity (tips) to any person bound by this code and or any other third party shall be guilty of a bribe and breaching this code and may be liable to criminal or civil prosecution under the laws of Uganda and or through the Company's disciplinary actions.
- f) A person(s) who is bound by this code shall conform to the acceptable standards and best known practices that will promote and conform to the Anti-corruption and Anti-bribery standards as set out in the Company's Anti-Bribery and Anti-Corruption Policy.

13. Honoring Commitments to Customers / Clients

- a) Kavali Capital Limited has invested and built a long-standing reputation for delivering products and services that meet the needs of our customer(s). All work performed by our employees must meet the terms of our contracts with clients.
- b) Failing to live up to this obligation could destroy the Company. Of course, while we will always go the extra mile to deliver our commitments to customers or to exceed their expectations, a line must be drawn at violating the law or any of the policies in the Code.
- c) If a person(s) who is bound by this code feels pressure to compromise these principles in order to meet a customer's commitment, such person is strongly urged to contact his immediate supervisor for further guidance to avoid a breach of the company code and policy.
- d) A person(s) who is bound by this code should never deliver a product or service to a customer that such person knows does not materially meet the specifications of the contract or the customer's desired need and or specifications.

14. Accuracy Of Books, Records And Representations

- a) A person(s) who is bound by this code is responsible for properly recording and reporting all material information with respect to his or her employment and areas of responsibility. Such person must not record entries that intentionally conceal or disguise the true nature of a transaction.

- b) All reports such as timesheets, proposals, quotations, financial reports, and expense reports to mention but a few, must be completed in an accurate and timely manner. No cost shall be charged to a customer if that cost is not allowed by the law, regulation or contract provision. A person(s) who is bound by this code who appends his or her signature on a report is certification that the information contained in such documents is a true representation of the contents of such report such as hours worked, the expenses incurred and the accounts for which those hours and expenses were incurred among others.
- c) In dealing with actual or potential clients, suppliers and subcontractors, you must be accurate and complete in all representations while giving no false or misleading statements. You should never organize information in a way that is intended to mislead or misinform those who receive it.
- d) A person(s) who is bound by this code must always use current, accurate and complete cost and pricing data while in the course and execution of his or her duties and or tasks.
- e) A person(s) who is bound by this code is hereby cautioned that submitting a proposal, quotation, status report, financial report or other document that is false, incomplete or misleading to a customer, business partner, third party, or a government agency can result in civil and or criminal liability for the Company, and or the involved employee and the supervisors who permit such practices.
- f) A person(s) who is bound by this code in short shall; not make an inaccurate, false or misleading entry in Company books, not make inaccurate, false or misleading statements to the customers, other employees, to government officials or to third parties doing business with us. Such persons shall accurately complete all reports, know and follow our accounting policies and internal control procedures.
- g) If a person(s) who is bound by this code, participates in the preparation of such incorrect reports, shall immediately report any inaccurate, false or misleading records to supervisory personnel and or the responsible Department in a speedy and timely manner.

14. Deceptive Advertising & False Statements

- a) At Kavali Capital Limited, we emphasize the quality of our services and products and do not make false or deceptive comments about our competitors or their services and products. If we or a person(s) who is bound by this code makes oral or written statements concerning a competitor or its services or products, they must be fair and factual.

- b) All person(s) who are bound by this code are therefore encouraged to; desists from making comments about a competitor's character or allege improper business practices, try to sell on the basis of our capabilities, know-how, and benefits to the customer, and not on the basis of a competitor's deficiencies.
- c) All person(s) who are bound by this code are further discouraged from making any statement about the specifications, quality, utility or value of a competitor's service or product unless the statement is based on the competitor's current published information or other factual data.
- d) Immediately report improper marketing activities to supervisory personnel and or the company's management for further management.

15. Relation with Vendors

- a) Our outside vendors are very important business partners and should be treated with courtesy and fairness at all times. We should always use common sense, good judgment and standards of integrity consistent with this Code when dealing with our suppliers and business partners.
- b) In deciding among competing suppliers, we should weigh all the facts impartially. We should select subcontractors and suppliers based on objective criteria, such as quality, experience, technical excellence, cost/price, schedule/delivery, services and maintenance of adequate sources of supply, and the customer's needs or demands. When negotiating with vendors, it is appropriate to try to get a better price or more services, but in so doing, we must never misstate or misrepresent facts regarding what other vendors are offering.
- c) If you are in a position to make or influence procurement decisions, vendors may try to influence you to give unfair preference to their materials or services. A person charged with handling, managing or overseeing such procurement and supply management should base his or her buying decisions on quality, delivery and service, and on a reasonable price based on market conditions, in order to obtain the best value for our Company and/or our customers.

16. Obligations Of the Employer / the Company

- a) While all persons who are bound by this code are expected to observe the code, Kavali Capital Limited (the Company) as the employer has the following obligations as laid down in the relevant laws:-
 - i. To provide satisfactory, safe and healthy working environment.
 - ii. To ensure reasonable pay for its staff.
 - iii. To ensure equal pay for work of equal value.

- iv. To ensure that employees are accorded rest and reasonable working hours and periods of holidays with pay as well as remuneration for Public holidays.
- v. To enable every employee to practice his or her profession or carry on his or her designated role or assignment as prescribed by law or by contract or other such lawful arrangement.
- vi. To accord every employee the right to join a Trade Union of his or her choice for the promotion and protection of his or her economic and social interests in accordance with the law.
- vii. To protect employee's rights, including the right to withdraw labour in accordance with the law.
- viii. To accord protection to female employees during pregnancy and after birth.
- ix. To provide its employees with the necessary tools, equipment and gear for performance of their duties.
- x. And any other such obligation that may arise from time to time or as may be already or shall be prescribed by law or desired by the company's management.

17. Employee benefits

- a) An employee's benefits are compensatory in nature and are partly provided for in the laws of Employment in Uganda and others may be expounded on or create by the Company. Some of these benefits have already been covered under the Employer's obligations but in order to compound the same and create clarity these may include but shall not be limited to:-
 - i. An Employment Contract,
 - ii. Prompt payment of salary or wage,
 - iii. Allowances and or bonuses
 - iv. NSSF, PAYE, and any other remittances to government,
 - v. Breaks and Meals,
 - vi. Paid Leave days,
 - vii. Pay raise and promotions,
 - viii. Health insurance and Medical cover,
 - ix. Payment in lieu of notice
 - x. Severance pay (if any)
 - xi. Fair hearing in the event of any breach of this code or misconduct,
- b) Any other such benefits the Company shall so prescribe in its policies and or contracts of employment or terms of engagement

18. Annual Leave and other Leave days

- a) Whereas the Company is alive to the provisions of law on leave and the possibility of its employees not being able to report to work for whatever

justifiable reason such as; loss of a loved one, sickness or health reasons, disability, academic reasons, or need to rest, the company shall prescribe acceptable and terms and lawful period within which a person so bound by this code may enjoy their right to leave without necessarily affecting the company's performance.

- b) Any such person so entitled to leave as spelt out is entitled to receive his or her wages / pay while on leave.

19. Onboarding and Firing Process

- a) The Company shall apply and implement fair, aggressive and efficient recruitment policies and practices as shall be managed by the Managing Director or any such other officer such as the Human resource so appointed to streamline these processes in accordance with the law and best practices.
- b) The Company management shall in dismissing, firing and or letting go of its staff set up a disciplinary committee for case that shall be referred to such committee for investigation on allegations of gross, inappropriate or misconduct in contravention of this laws and company policy.
- c) Any such person that to be fired by the company shall be required to go through the due process of a fair hearing as shall be set out by the company in detail.
- d) Any such person so employed or contracted shall be at liberty to redeem, terminate, or withdraw his or her services so rendered to the company and the Company shall not unreasonably withhold her consent on the same.
- e) The Company and its management shall at any time it so deems necessary make, review, and or adopted methods, systems and policies that shall aid in the Onboarding process and Firing Processes.

20. Diversity and Inclusion

- a) The Company is committed to fostering a culture where everyone has the chance to pursue their goals and fulfill their potential. Our Company strives to be a friendly and inclusive place to work, where all contributions are welcomed, and where our differences are celebrated.
- b) We are committed to living our Diversity, Equity and Inclusion values every day and making inclusiveness a habit to build a workforce and culture that is reflective of our values and our communities across the globe.

- c) The Company Shall maintain a Diversity, Equity and Inclusion policy that, together with our strategy, sets forth the principles by which the Company will enhance diversity, equity and inclusion throughout the organization.
- d) All persons who are bound by this code in the observance of Diversity, Inclusion and Equity values, are expected to:
 - i. Respect the dignity and diversity of all people.
 - ii. Create an inclusive environment that is free from discrimination, harassment and bullying.
 - iii. Draw from a broad pool of talent in a local marketplace/region to reach outstanding talent inclusively, create diverse slates and, ultimately, create a workforce that reflects the communities we serve.
 - iv. Identify ways that you can participate in promoting and help the company meet its goals and responsibilities on Diversity, Inclusion and Equity.

21. Physical & Mental Health

- a) The Company shall tasked with creating, promoting and ensuring that any and all person under its care and or such persons bound by this code are in great in an appropriate and modest physical and mental shape.
- b) The company shall be tasked with maintaining and encouraging a healthy work environment through Physical exercise and therapy sessions and or open spaces that encourage open communication to promoted mental health.
- c) The Company may adopt any such practices that it thinks fit and proper to promote the Physical and mental health of its employees and any such person bound by this code, where necessary.

22. Protection on Complaints

- a) The Company shall at create an environment and system that ensures that complaints are handled speedily with due care, caution and the utmost confidentiality to promote safety and anonymity of any such person making a complaint.
- b) The Company undertakes to protect all and any such persons with complaints, against any discrimination, firing, and mistreatment of staff arising from complaints.

- c) Employees and or any such persons so aggrieved are free to seek the services of a lawyer and or its Trade Union representatives to address the said complaints.

23. Legal Compliance

The Company may at any such time require legal services to guide, implement, execute and or carry out any such legal activity so require. In doing so the Company's legal team and or officer shall ensure that the Company is compliant with the laws governing its functions and operations as well as the compliance of the company, its staff and third parties with this code among others.

SANCTIONS AND PENALTIES

Unethical conduct by any such person bound by this code shall not be accepted and or be kept in the Company's employment or shall not be allowed to transact further with the Company once found in breach of this code.

Sanctions for any breach of this Code shall be those prescribed by the Company's top management and those affected by the same duly notified, as the case may be from time to time. Depending on the gravity of the offence or misconduct, the following penalties may apply; warnings, suspension, immediate dismissal, criminal and or civil prosecution, demotions, half pay while under investigation, among others.

Gross misconduct as shall be defined and prescribed the management from time to time shall attract an immediate dismissal and disciplinary action as the case may be.

REWARDS

In Keeping with the code, an appropriate reward and recognition shall be accorded to a person(s) who are bound by this code who exhibits good ethical conduct. A reward shall be accorded to the person(s) who is bound by this code by the immediate supervisor or the top management upon recommendation by the supervisor or upon meeting such criterion that shall be used to identify such person(s) and the appropriate coinciding reward.

The rewards shall include; but not limited to;- (a) Word of recognition of good performance, (b) Open praise, (c) Letter of commendation and or certificate of appreciation, (e) Presents, (g) Certificate of merit, (h) Concessionary trips, (i) Cash bonuses, (j) Salary increments, (k) Award of Medals, and (L) Promotions.

CONCLUSIONS

This code of Conduct is expected to be beyond reproach. It is not an employment contract; and does not constitute terms and conditions of an employment agreement; and it is not a promise of continued employment. However, it may be expressly incorporated into your employment agreement, if you have one, in accordance with the laws of Uganda.

This Code's guidelines are subject to amendment, in whole or in part, by the Managing Director and or management at its sole discretion, except where such unilateral amendment is prohibited.

This Code shall be read in tandem with other company policies and shall unless the context does not admit, be deemed to supersede such other policies.