

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.