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### Code of Ethics for Business in Kenya Letter of Commitment & Engagement

	ereby express my company's voluntary w	ADVISORY SERVICES I	(please write name of company
_	ease tick applicable box): apport and implement the Code of Ethics	for Business in Kenya as per category I	1 1/
1	apport and implement the Code of Ethics		
	order to demonstrate our commitm of following:	nent to this Code in the Category	chosen, we shall endeavour to d
I)	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	e commitment to the implementation o	f 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 compa 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;		
		e conduct of such subsidiaries, joint vent	tures and branches is consistent with
6)	the Code;	own its ethics and anti-bribery policies to	
6) 7)	the Code; Our business enterprise shall make known		o contractors and suppliers;
7)	the Code; Our business enterprise shall make known	own its ethics and anti-bribery policies to own instances of corruption are reporte	o contractors and suppliers; ed to the relevant authorities.
7)	the Code; Our business enterprise shall make known we shall make it mandatory that all known the	own its ethics and anti-bribery policies to own instances of corruption are reporte annually with communication to the GCI	o contractors and suppliers; ed to the relevant authorities.
7) This	the Code; Our business enterprise shall make known we shall make it mandatory that all known tha	own its ethics and anti-bribery policies to own instances of corruption are reporte annually with communication to the GCI	o contractors and suppliers; ed to the relevant authorities.
7) This	the Code; Our business enterprise shall make known we shall make it mandatory that all known is letter of commitment will be renewed a september of the commitment will be renewed as the commitment will be renew	own its ethics and anti-bribery policies to own instances of corruption are reporte annually with communication to the GCI	o contractors and suppliers; and to the relevant authorities. NK secretariat :
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### 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 I, but will only have to start reporting from year 2.









## mplementation

organisations. We demonstrate our ethical our adherence to this Code in our organisations, and by reporting annually on implement the values and obligations of this Code commitment by creating policies and structures to As leaders, we set the ethical tone in our

letter of engagement.

### Adherence

Code, companies are not expected to report on their In the first year following their commitment to the adherence to the Code, but they have to:

- Aspire to adhere to the Code;
- Make it public that they have committed to the Code (on a website, in an annual report, Communication on Progress report); and or through the annual Global Compact
- Participate in seminars and workshops organised by GCNK, KAM, KEPSA and FKE

# Integration and Reporting

its report available to the GCNK Secretariat. In this report, the company will indicate: implementation progress. The company will make Code, a company will publicly report on Code From the second year after committing to the

- How it has applied and integrated the Code in
- Progress it has made with implementing an internal ethics and anti-corruption management

monitoring and review. implementation; training; awareness; and policies and procedures; effectiveness of risk assessment; top level commitment;

### In addition, a company will:

- Visibly promote responsible business conduct to commit to the Code; and and exert influence on other companies also
- Participate in relevant seminars and workshops organised by GCNK, KAM, KEPSA and FKE

criteria under 'INTEGRATION and REPORTING from the first year, but only needs to start reporting A company may immediately start adhering to the from the second year.

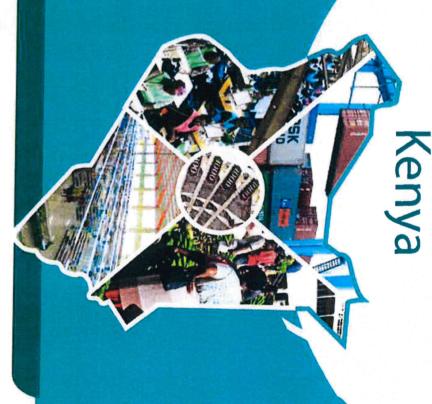
### Non-adherence

Non-adherence to this Code has consequences particulars of the case: following three steps, taking cognisance of the Code, organised business will institute the Should a signatory company transgress this

- Step | Discuss the transgression with the to avoid a recurrence; ensure that steps are put in place level (Board of Directors, CEO) to offending company at the highest
- step≥ ≯Release a public statement the transgression; and expressing moral disapproval of
- Steps >Publicly exclude the offending is satisfied that the transgression company from the Code until it has been corrected

# programme, for example, ethics and corruption

# for Business in CODE of Ethics





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