



## ETHICS POLICY

REVISED JULY 2022

### Purpose

This policy provides the framework and guidelines on the company's approach to ethical behaviour during the conduct of its business. In the case of KVTC employees, it should be read in conjunction with the company's Staff and Administrative Instructions (SAI).

### Scope

The policy applies to all the company's directors, employees, contractors and their employees, consultants, agents and representatives.

### Policy

It is the policy of KVTC to adhere to all laws and ethical standards applicable in all jurisdictions it conducts its business. The company will conduct its business lawfully and will do so with honesty and integrity. This will apply regardless of business, market, political, cultural or any other pressures or inducements.

KVTC will expect and demand the highest level of ethical conduct underpinned by the guidelines listed below.

#### Gifts, Favours and Payments.

- We will not offer or accept anything of value with the purpose of inducing or entering into any business relationship with anyone.
- We will not pay or accept any bribes.
- We will not use KVTC's resources, assets or services directly or indirectly for any personal or improper purpose.

#### Conflicts of Interest

- We will avoid any situation which involves or may involve a conflict between personal interests and the interests of KVTC.
- Each individual shall make prompt and full disclosure in writing to the CEO of any issues that may involve conflict of interest.
- KVTC board members should declare to the KVTC Board of Directors any conflicts of interest.

#### Social Media

- We will not engage in social media in any way that will damage the reputation of the company.

#### Integrity and Fairness

- We will not make any false or fraudulent statements to any parties in connection with preparation of company documents / reports or during audits and inspections.
- We will treat everyone fairly and with respect without regard to race, tribe, religion, gender, marital or family status, disability, age, political affiliation or any other trait.



KILOMBERO VALLEY TEAK COMPANY LIMITED

## ETHICS POLICY

REVISED JULY 2022

- We will keep the local communities informed about issues which may affect them.
- We will not take advantage of our position in the company to gain sexual favours from anyone who wants to enter into any business or employment relationship with KVTC.

### Confidential Information

- We will not divulge or use any confidential company information or any other information which might be contrary to the interests of KVTC without prior authorisation from the CEO.

### Compliance & Review

Any violation of this policy will result in the offender facing disciplinary action or cancellation of service agreement in the case of non-employees.

Any individual who becomes aware of any violation of this policy shall promptly report to their line manager, any other senior manager or board member.

Implementation of the Ethics Policy will be the responsibility of the CEO on behalf of the Board of Directors and will be reviewed annually.

Irvine Kanyemba  
Chief Executive Officer.