HOME AFRIKA
Houses Become Homes
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CODE OF CONDUCT AND ETHICS

AUGUST 2024

Home Afrika Limited | 5th Floor, Morningside Office Park | Ngong Road, P.O. Box 6254 – 00100, Nairobi. Tel: +254 (0) 20 272000
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1. CODE OF CONDUCT AND ETHICS

1.1 Policy Statement

This policy on Staff Code of Conduct has been adopted with a view to clarify to employees the conduct expected in the performance of their duties and to provide them with a guide to ethical issues. It is recognized that whereas no written policy can anticipate every ethical dilemma or definitively set forth the appropriate action for all business situations, this Code of Conduct emphasizes a standard of ethical conduct that must permeate all the business dealings and relationships.

The Staff Code of Conduct and Ethics is critical in setting the proper tone in the organization, creating and maintaining a culture of honesty, high ethics, good conduct and unquestionable personal integrity within the wider framework of the company's core values.

1.2 Policy Objective

Home Afrika Ltd expects its employees to achieve and maintain a high standard of ethics, professional conduct and work performance to ensure the Company maintains its reputation with all internal and external stakeholders.

The main objective of this policy is to enhance the Company's reputation as a quality service provider and an enjoyable, stimulating and challenging place to work. The policy will include:

- Observing HAL policies and procedures
- Treating all stakeholders with courtesy and with respect for their rights, duties and aspirations

Employees who do not conform to this standard of conduct will be subject to disciplinary process as detailed in this policy.

1.3 Guiding Principles

The following principles will be applicable under this policy:

- All Staff Members are to sign a declaration of their observance of the code of conduct, upon joining the Company.
- Employees must comply with the code of conduct in their day to day work.
- Any observed cases of non–compliance must be reported to the HoD, or the FO or the Head of HR and Administration, or the MD.

1.4 Hours of Work

HAL's standard working hours are as follows:

DAYS (Monday Till Friday)	
Morning and early afternoon	08:00 – 13:00 hrs.
Lunch Break	12:00 – 15:00 hrs (1 hour)
Afternoon	14:00 – 17:00 hrs.

i. All employees are expected to adhere to prescribed working hours unless they have made acceptable prior arrangements. Failure to do so may lead to disciplinary action being taken against the employee

ii. Employees may be required to work outside the prescribed working hours depending on the prevailing circumstances.

iii. Employees who work over and above the normal working hours provided will be entitled to overtime or time off in lieu following consent by employees, provided that approval is obtained beforehand from the immediate HoD. This also applies to those who work on their designated rest days and gazette public holidays.

iv. All offices will remain closed on Gazetted public holidays and rest days except in cases when it is in the company's interest to work on these days.

1.5 Conflict of Interest

Employees must not engage directly or indirectly in any business activity that competes or conflicts with the Company's interests. Staff are not to get into any situation where their personal interests' conflict or appear to conflict with the interest of the Company or its customers. This applies within and outside the official business hours. Engagement in business or employment outside the Company is considered a conflict of interest. Where members of staff have a financial interest in a business, whether as a sole proprietor, partner, shareholder, creditor or debtor where a conflict of interest exists, such interests must be disclosed immediately to the MD and written approval sought. If there are any doubts about the issue of conflict of interest, it is best to seek written clarification through their respective Managers. The following principles shall apply:

1. Members of HAL shall conduct themselves at all times in a manner befitting their status such as members of a reputable national organization.

2. By accepting appointment, the employee pledges himself or herself to discharge their duties and to regulate their conduct within the interest of HAL only. They shall neither seek nor accept instructions from any other authority external to HAL.

3. HAL's staff shall not engage in any activity which is incompatible with the proper discharge of their duties within HAL or which may adversely reflect on their status or the integrity, independence or impartiality.

1.6 Non Disclosure of Confidential Information

It is the responsibility of all HAL employees to keep all organization information known to them confidential. This information may be written or oral. Each employee must exercise care in handling, taking custody of the organization's information. All employees are expected to exercise control over the organization's confidential information, which may be acquired in the course of their employment with HAL.

Any unauthorized disclosure of the organization's information is a serious offence and appropriate disciplinary action will be taken against the employee. No employee shall use confidential information concerning the organization for personal gain. In addition:

i. Employees shall not make public statements or engage in any other activity relating to the purpose, functions or interests of HAL, unless specifically authorized by the MD.
ii. Employees shall not communicate to any person any official information known to them by the virtue of their employment with HAL, except as directed by the MD.

1.7 Acceptance of Gifts

HAL shall maintain principles of conduct that will ensure that all business relationships function in an atmosphere of complete objectivity. All employees who participate in the selection of suppliers, products, or business opportunities are expected to adhere to these principles.

All employees shall openly declare any gifts, cash or other gifts in kind which they receive from HAL's business partners/members. Gifts which might place the employee in a difficult prejudicial or embarrassing position or interfere in any way with the impartial discharge of his duties will be discouraged. Any known or suspected violations of this policy should be reported to the Head of HR and Administration immediately.

i. Gifts will be defined as merchandise, rewards, fees commissions or other items given to any HAL employees by outsiders. Gifts that are worth Kshs 5,000 and above must be declared openly to the Head of HR and Administration to promote transparency and discourage corrupt practices.

ii. Gifts in kind will be defined as the personal use or enjoyment of facilities, properties, weekends etc. which are not incidental to normal business relationships.

1.8 Corrupt Practices

i. Misappropriation or embezzlement of HAL funds, involvement in corrupt practices, receipt or solicitation of gifts, rewards, fees or commissions by employees is prohibited.

ii. Supervisors will not exercise undue pressure to employees to support incorrect viewpoints, sign false or misleading documents or carry out unethical behaviors.

iii. Employees shall not solicit for rewards/bribes before, during and after performance of duties assigned to them.

iv. Failure to declare to the MD any business interests particularly where companies, partnerships or associations in which one holds interests/does business will result in disciplinary action.

v. Conversion of HAL funds, vehicles, assets and resources for personal use is completely prohibited and will result in disciplinary action.

vi. Associating with parties through which HAL losses funds and/or assets as a result of improper/fraudulent documentation either by self or by third party will result in disciplinary action.

1.9 Workforce Diversity

HAL encourages diversity in terms of religion, socio-cultural orientations, and ethnic backgrounds. It is the duty of every colleague to make an effort to create harmony and peaceful co-existence at the work place by avoiding and discouraging bigotry. Additionally no supervisor will practice bias or malice in their treatment of colleagues especially on matters relating to performance evaluation, discipline, recruitment, salary increment and other benefits.

1.10 Trusteeships

Staff must not seek appointments as executors, administrators or trustees of customers' estates. If such an appointment is made and the staff member is a beneficiary of the estate, his signing authority for the estate's bank account(s) must be approved by the MD.

1.11 Abuse of Power

Abuse of power includes but is not limited to the use of the Company's name or facilities to obtain personal advantage in political, investment, retail or other transactions and activities. This includes soliciting and accepting any gifts or favors.

1.12 **Procurement:** Employees must not participate in or influence the purchase of goods or services from any company in which that employee has a direct or indirect interest.

1.13 **Preferential Treatment on Staff Benefits**: Employees must not extend to relatives, friends or other third parties the benefits and preferential rates accorded to them by the Company by virtue of their employment.

1.14 **Use of Company Name**: Employees must not use the Company's name or facilities for personal advantages in political, investment or retail purchasing transactions, or similar types of activities

1.15 **Use of Company Facilities**: Acts of dishonesty involving theft, misuse, destruction, misappropriation of money, property, office equipment, supplies or any other items of value are prohibited. Employees are to protect and properly use the Company's property including computers and internet access for the Company's business only.

1.16 **Frauds, Forgeries and Falsehoods**. Any unlawful making of misrepresentation which causes actual prejudice, or which is potentially prejudicial to the Company, customers or suppliers will be ground for immediate summary dismissal and prosecution in line with the terms and conditions of service spelt out in this policy and the Employment Act (2007).

1.17 **Intellectual Property, Trademarks, Copyrights and Patents**.

Employees are to protect and where appropriate enforce the Company's intellectual property rights. Employees are to protect the Company's trademarks, copyrights, patents, documentation, training material, computer codes, publications, and other works of authorship they develop for the Company. In the course of their work, Staff may create, discover or develop software, methods systems or other patentable inventions when performing their responsibilities or utilizing information or resource available in connection with their employment. To the extent permitted by law, all such works of authorship and invention whether or not patentable or protectable by copyright trade secret or trademarks remain property of the employee. HAL shall however have first right of refusal. In the same way, employees must respect the intellectual property belonging to third parties. They must not load unlicensed software in their computers.

1.18 **Soliciting and/or Acceptance of Gifts, Favors, and Inducements:**

Employees must not solicit or accept directly or indirectly, any cash or monetary equivalents, gifts, tokens or any objects of significant value or preferential treatments from any person or enterprise that has or is seeking business with the Company where doing so may influence or appear to influence their business judgment. Indirect gifts can include gifts to family members. Conversely employees must also not offer excessive gifts or entertainment to customers and other whose business the Company may be seeking.

1.19 **It is against Company policy to engage in any form of bribery, corruption**, including the offer or acceptance of any payments, gratuities, kickbacks, to obtain or retain businessor secure services. Employees must not make any expediting or facilitating payments that may be demanded by government personnel to take routine action to which the Company is entitled under applicable law.

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1.20 **Christmas Gifts and Tokens.** Where Christmas gifts or such other festive season's gifts are given in appreciation of work well done or in appreciation of the business relationship, no member of staff shall individually receive a gift. All gifts received will be pooled together at the departmental level and a raffle conducted to give equal chance for all employees.

1.21 Personal Financial Responsibility

Employees must be especially careful in the management of their personal finances. Employees should practice the principle of living within their means and not expose themselves in circumstances that could lead to their financial embarrassment or reflect unfavorably on the Company. Providing the Company with false information about one's financial position will lead to disciplinary action as per the disciplinary policy. Soliciting funds from colleagues is prohibited.

1.22 Misrepresentation

Misrepresentation of any form in material fact by a prospective employee during the recruitment, selection, appointment and deployment process shall be sufficient and mandatory ground for summary dismissal from employment. If it becomes evident, subsequent to an employee's appointment that the employment in a given capacity was the result of the submission of materially misleading information, the employment shall be annulled without prior notice and without compensation.

1.23 Confidentiality

All employees are enjoined to observe secrecy and utmost confidentiality in Company dealings. No member of staff should during, or upon and after termination of employment with the Company (except in the proper course of duty and/or with the Company's written consent) divulge or make use of any secret correspondence or accounts of the Company or its customers.

Employees are also to safeguard the privacy, confidentiality and security of employee data and respect and maintain the confidentiality of information staff learn about other colleagues. Such information includes but is not limited to salaries, health status, disabilities etc. Staff must not share this information with anyone inside or outside the Company, except as is necessary to perform his or her role.

1.24 Research on the Company

Employees are not to carry out research including research for academic purposes, based on the Company without written authority from the MD.

1.25 Records and Reports

All records and reports that every employee is responsible for must be accurate and complete. Employee should never make or facilitate false entries or obscure the true nature of a transaction.

Access to and use of all records, computer files or programs of the Company must be limited to authorized persons and for the Company's use only.

1.26 Reporting of Fraud, Risk, Irregularities and Errors

Personal integrity is of utmost importance for HAL as a Company. As a member of Staff, one may become aware of a security risk, fraud, theft, misuse, misappropriation, errors and other irregular or unethical practices. Even if it involves a more senior Staff, it is the duty of the employee to inform their respective Manager, Security Manager, Head of HR and Administration or the MD without delay.

If employees suppress that information, they could later appear to have been part of a conspiracy. However, it is important to remember that directly and immediately confronting a suspect with an accusation could lead to personal danger, destruction of vital evidence, a cover up and an improbable accusation. It is thus better to promptly make a clear report of suspicion to the authorized people as indicated above. Irregularities by junior staff will not be excused on the plea that they were acting under orders of their supervisors.

1.27 Gambling, Alcoholism and Substance Abuse

Gambling, consumption of Alcohol and Drugs are not permitted. Gambling even during employees' working hours and on company resources is completely prohibited. Employees should not be under the influence of alcohol or drugs while on duty or acting on behalf of the Company.

All work premises of the Company are smoke free zones and smoking is restricted to the designated smoke zones. Employees should not smoke whilst within the premises or inside vehicles of the Company.

Employees are not to report to work or remain at work while intoxicated. Employees are prohibited from using or possessing alcohol while on duty. The possession, use, purchase or distribution of illegal drugs (meaning those drugs which there is no generally accepted medical use, e.g. marijuana, cocaine) by employee in a company vehicle, at a job site, on company property, or during work hours is strictly prohibited.

1.28 Interpersonal Relationships

Employers and employees build professional relationships and treat one another with respect. They are discouraged from having personal and romantic relationships with colleagues as this creates conflict of interest and moral concerns where one or both colleagues are married. However, in cases where this occurs the Head of HR and Administration will address the issue on a case by case basis. All such relationships must be declared to the HR by the concerned employees. Failure to declare will lead to disciplinary action.

1.29 Whistle Blowing

The Whistle-blower Policy is intended to encourage employees and others to raise serious concerns within the company prior to seeking resolution outside the organization, and to enable them to do so without fear of retaliation or victimization.

If an employee is not comfortable sharing the issue with her supervisor or is not satisfied with the supervisor's response, he is encouraged to directly contact the Head of HR and Administration or the MD.

In response to any reports of wrongful conduct received, the company will promptly carry out a full and fair investigation of the reported conduct and take appropriate actions based on the findings. Anonymous reports will not be acted upon.

All whistle-blowers will be protected, and the information held in strict confidence. Therefore, no one who reports in good faith wrongful conduct will suffer harassment, retaliation, or adverse employment consequence. A Supervisor or Manager who retaliates against a person who has reported a violation in good faith is subject to discipline up to and including termination of employment.

Anyone filing a complaint of wrongful conduct must be acting in good faith and have reasonable grounds for believing the information disclosed indicates wrongful conduct. Any allegations that prove to have been made frivolously, maliciously, or knowingly to be false will be viewed as a serious disciplinary offense.

Reports of wrongful conduct or suspected wrongful conduct will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. A special email address has been set up to with restricted access by the MD and the Head of HR and Administration.

1.30 Care for company property

Employees are expected to look after the organization's property and resources. Conversion of HAL funds, vehicles, assets and resources for personal use is completely prohibited and will result in disciplinary action. Associating with parties through which HAL losses funds and/or assets as a result of improper/fraudulent documentation either by self or by third party will result in disciplinary action.

1.31 Protection of the company's image

HAL employees are expected to conduct themselves in a manner acceptable to the general public while maintaining a good image and reputation of the organisation. They are prohibited from making or uttering false statements about the organization to the general public. The deliberate use of insulting language to members of the public or engaging in conduct which is interpreted as deliberate insult to HAL will result in disciplinary action against the individual.

1.32 Proper dressing and personal grooming

Employees are expected to exhibit good judgement in selecting work attire. All employees will practice good personal hygiene and should be clean, neat and professionally appropriate. HAL reserves the right to request a staff member to dress to an appropriate standard as a condition of employment. Employees will be allowed to ***"dress down"*** on Fridays or to wear "***branded clothing"*** when on official duty or at Company functions.

1.33 Other terms and conditions of service

1.33.1 Transfers

The company reserves the right to transfer an employee at any time to serve in any business unit, subsidiary company or station in Kenya and outside Kenya. In doing so, the company shall have due regard to the employee's career development and pursuit of company interests.

1.33.2 Secondment

From time to time, employees may be seconded from one of the Subsidiary Companies. Conversely, HAL may second an employee to another company to gain specific skills requirements and exposure to meet its objectives. This is a recognized form of development as the seconded employee will gain new skills and experience and ultimately enhance their career development. This will be handled on a case by case basis based on the business case.

Approved by the Board of Directors on the ..... 31ST ..... **Day of** ..... AUGUST **2024**

..... 31ST AUGUST 2024 .....

Chairman of the Board — Date

Seconded by;

..... 31ST AUGUST 2024 .....

Director — Date