Corporate Code of Conduct and Ethics

Aligned with the Camellia PLC Group Guiding Principles

1. Purpose and Commitment

Eastern Produce Kenya Limited (EPK) is committed to maintaining high standards of corporate conduct and ethical behaviour. As part of the Camellia PLC Group, we are committed to the eight Group Guiding Principles which cover Whistleblowing, employee wellbeing, respect for Human Rights, environmental responsibility, health and safety, product safety and quality, financial crime and tax compliance.

This Code sets out the expectations for employees, contractors, suppliers, and service providers (collectively "personnel") of EPK and advances our commitment to **integrity, transparency, sustainability, and respect for people, communities, and the environment.** Employees (including all Directors of the Company) are additionally bound by specific conduct obligations under their employment terms and related Human Resource policies.

2. Core Standards of Behaviour

All personnel are expected to:

2.1. Act with honesty and integrity in all day to day dealings with the Company. Concerns about integrity should be raised through the Whistleblowing channel or other approved reporting mechanisms.

2.2. Be transparent in Company business transactions, seeking Executive Management guidance when required.

2.3. Respect Human Rights in line with internationally recognised standards, including the UN Guiding Principles on Business and Human Rights and comply with the Company's Human Rights Policy.

2.4. To conduct themselves in line with our commitment to long-termism, sustainability and custodianship of Company assets.

2.5. Engage in a manner which is consistent with our values and Brand identity of Cultivating Quality in everything we do.

3. Zero Tolerance for Corruption

The Company maintains a **zero-tolerance policy** towards corruption. Acts of bribery, fraud, theft, abuse of authority, embezzlement, extortion, influence peddling, facilitation payments, political contributions, the offering or receipt of unauthorised gifts and hospitality, or misuse of confidential information constitute **gross misconduct** and will result in dismissal and possible prosecution.

3.1. Definitions:

3.1.1. Bribery: Offering or soliciting benefits to improperly influence decisions.

3.1.2. Fraud: Concealment or misrepresentation of material facts for gain.

3.1.3. Abuse of Authority: Misuse of vested power for personal benefit.

3.1.4. Embezzlement: Theft of entrusted resources.

3.1.5. Extortion: Coercion to obtain benefits.

3.1.6. Influence Peddling: Using influence to secure favours in exchange for payment.

3.1.7. Facilitation Payments: Payments made to expedite routine actions, prohibited under this Code.

3.1.8. Political Contributions: No direct or indirect contributions to political parties or individuals for business advantage.

3.1.9. Gifts and Hospitality: Accepting or offering gifts or hospitality that, by virtue of their value, could influence business outcomes is prohibited.

4. Conflict of Interest

Employees must avoid situations where personal interests conflict with corporate responsibilities.

4.1. No engagement in external business activities without Company consent.
4.2. No involvement in recruitment or business transactions with relatives, or where this is not possible to declare and recuse oneself from the process.
4.3. Full disclosure of personal or family business interests that could conflict with Company business.
4.4. Strict adherence to transparent recruitment practices, free from bias or discrimination.

5. Responsibilities of Management

Managers are entrusted with setting the tone of ethical leadership. They must:

5.1. Lead by example, embodying the standards of this Code and our Company values:
5.2. Train and guide staff to enhance their contribution and career development.
5.3. Advance and foster compliance with Company policies and maintain accurate records.
5.4. Protect Company property and assets, ensuring custodianship for future generations.
5.5. Refrain from using influence to circumvent rules or impose personal views.
5.6. Resign from employment before engaging in political campaigns, respecting democratic rights without compromising corporate neutrality.

6. Reporting and Accountability

Employees are required to report any breaches of this Code. Reports will be investigated thoroughly under the whistleblowing policy or, where appropriate, our Operational Level Grievance Mechanism. Whistleblowers will be protected from retaliation.

7. Framework and Supporting Policies

This Corporate Code of Conduct and Ethics serves as the framework document for EPK. It establishes the overarching principles and standards that guide our corporate behaviour and ethical responsibilities.

To give practical effect to this framework, the Company will issue and maintain a series of guidance policies and procedures (Key Polices). These documents provide detailed instructions and operational clarity on specific areas, including but not limited to:

- Human Rights Policy
- Whistleblowing & Complaints Policy
- Anti-Sexual Harassment Policy
- Fair Treatment and Good Working Conditions Policy
- Health & Safety Policy
- Environmental Policy
- Food Safety, Certification & Quality Policy
- Tax Policy
- Financial Crime Policy
- Treasury Policy

Together, these guidance policies and their associated procedures, form the operational architecture that supports the implementation of this Code. They are binding on all employees, contractors, suppliers, and service providers, and must be read in conjunction with this framework document.

8. Board Oversight

The Board of Directors shall oversee the implementation, effectiveness, and periodic review of this Code. The Board remains responsible for ratifying Key policies including those stipulated under this code.

9. Conclusion

This Code is not only a compliance framework but a reflection of our corporate identity as part of our commitment to our value structure as defined by our brand of 'Cultivating Quality'. By adhering to these standards, we safeguard our reputation, strengthen stakeholder trust, and contribute to sustainable growth for future generations.

Policy Approval

Approved by the Board of Directors following review by the EPK PRC, May 2026.