



aviance

Code of Conduct

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CONTENTS

INTRODUCTION.....	3
OUR PRINCIPLES.....	4
Mutual Respect	4
Commitment to quality	4
Affordability	4
Why Do We Have a Code?	4
Who is Required to Follow Our Code?.....	4
What is Expected of Me? (Employees’ Expectations).....	4
Additional Expectations for Managers and Supervisors.....	5
How do we apply the Code in practice?.....	5
HOW WE PUT THE CODE IN PRACTICE.....	6
Conflicts of Interest	6
Dealing with Families and Relatives	6
Antitrust and fair dealing	6
Confidential information	6
Fraud, protection of company assets, accounting.....	7
Bribery and corruption.....	7
Gifts, meals, entertainment	8
Discrimination and harassment.....	8
Reporting illegal or non-compliant conduct.....	8
The use of Alcohol and drugs	8
Safety	8
Failure to comply.....	9

INTRODUCTION

The Aviance Code of conduct has been drafted in a simple language for our employees and those acting on our behalf to understand without difficulty. The intended purpose is to guide employees' behaviour whilst conducting business in an ethical and responsible manner. Essentially, when employees are faced with ethical dilemma, the code can assist them in making the right decisions.

Do note, however, that while the Code is the cornerstone of Aviance's commitment to integrity, it is not intended to identify all applicable laws or policies, nor supersede our individual responsibility for adhering to regulations, other internal policies and behaving ethically. Rather, the aim of this Code is to help you make informed decisions should you ever be faced with an ethical dilemma, as well as give you the knowledge and courage to speak out should you ever feel that others are not operating with the same standards.

The code sums up how we conduct our business and explains our expectations of our employees who are our most cherished resource.

The code of conduct binds all employees and those who act on behalf of Aviance Ghana.

By knowing and following our Code, each of us does our part to maintain and further build trust with our various stakeholders—including our colleagues, customers and business partners, shareholders and the communities where we operate. It is important that we fulfil our commitment to these groups and uphold integrity in our interactions at all times.

For the purposes of this Code, references to "employees" include employees, associates, officers and directors.

OUR PRINCIPLES

Mutual Respect

We believe our employees must show respect to one another in the course of working together. Respect should not be based on any circumstance such as class, age, religion, grade etc. We are entitled to disagree with colleagues whilst remaining respectful. It is expected of each colleague not to show retaliation by disrespecting others. We rather expect to engage one another through structured communication channels to inure to our benefits. Colleagues are expected to remain respectful when dealing with clients, business partners and other representatives who act on behalf of Aviance.

Commitment to quality

Quality is our hallmark whilst conducting business with our partners and we ensure that inasmuch as we deliver with speed, we do all that through professionalism. We take cognisance of the fact that exceptional service delivery goes with quality and this goes a long way to delight our clients. It matters a lot to us to deliver quality and that explains why we invest in the training of our employees to deliver their utmost best to our clients. We believe delighting our clients is better achieved through our trained employees.

Affordability

Essentially, we focus on the best outcomes for our clients whilst engaging them at competitive prices. We are interested in business sustenance so whilst providing quality we pay attention to meeting the varying needs of our clients thereby offering services at affordable rates.

Why Do We Have a Code?

We have a Code of Conduct to show us how to make sound decisions and to demonstrate proper actions for conducting our business.

By knowing and following our Code, each of us does our part to maintain and further build trust with our various stakeholders—including our colleagues, customers and business partners, shareholders and communities where we operate. It is important that we fulfil our commitments to these groups and uphold integrity in our interactions at all times.

Who is Required to Follow Our Code?

Our Code applies to all employees, officers, board of directors, contract workers and agents of Aviance, our divisions and our affiliates in all countries. Aviance expects that, when working on our behalf, our suppliers, business partners, agents and consultants will uphold the principles of our Code.

What is Expected of Me? (Employees' Expectations)

- Comply with this Code and all applicable laws, rules and regulations
- Report any violation of this Code of which you become aware to your immediate supervisor

- Seek guidance from the Human Resources department if are doubtful about interpretation or implementation of the Code
- Behave ethically and honestly to ensure compliance with the Code
- Recognise that any employee found to be contravening the Code will face disciplinary action and could lose their job

Failure to comply with our Code and company policy can have severe consequences for both our company and the people involved. In addition to potentially damaging our reputation, any conduct that violates the Code may also violate the law. Violations of our Code or company policies may lead to disciplinary action, up to and including termination of employment. When appropriate, Aviance may also refer cases to government authorities, which may result in personal liability for individuals involved.

Additional Expectations for Managers and Supervisors

Following our Code and all applicable laws and regulations is the foundation of our company's continued success and positive reputation. While each of us has a duty to follow our Code, managers and supervisors have an even greater responsibility: you serve as ambassadors for our Code with your team members. You must ensure that the Code is communicated to everyone who works with you, and that they receive appropriate information/training on the Code and the policies that impact their jobs.

How do we apply the Code in practice?

We recognise that no Code or policy can cover every scenario. If you are faced with an ethical dilemma, the following questions can help inform your choices:

- Is the action or activity legal?
- Does it comply with our Code of Conduct and other relevant policies?
- Would the action or activity be at the expense of others?
- Would it be embarrassing for Aviance if it was reported publicly?
- Would it damage our reputation?
- Would it harm the environment?
- Would it damage my integrity or people's trust in the Company?

HOW WE PUT THE CODE IN PRACTICE

Conflicts of Interest

We will always seek the best interest of Aviance. A Conflict of Interest occurs when personal interests of an employee or the interests of a third party compete with the interests of Aviance. In such a situation, it may be difficult for the employee to act fully in the best interest of Aviance. Employees shall take steps to avoid Conflicts of Interest whenever possible. If a Conflict of Interest situation has occurred or if an employee is faced with a situation that may involve or lead to a Conflict of Interest, the employee shall disclose it to his or her Line Manager and/or the HR to resolve the situation in a fair and transparent manner.

Dealing with Families and Relatives

Our hiring and people development decisions will be fair and objective. Immediate family members and partners of employees may be hired as employees or consultants only if the appointment is based on qualifications, performance, skills and experience and provided that there is no direct or indirect reporting relationship between the employee and his or her relative or partner. These principles of fair employment will apply to all aspects of the employment, including compensation, promotions and transfers, as well as in case that the relationship develops after the respective employee has joined the Company. Provided that they are equally suitable as other candidates, priority may be given to children of Aviance employees with respect to internships, training periods, employment during holidays and similar short-term assignments.

Antitrust and fair dealing

Aviance is prepared to compete successfully in today's business environment and will always do so in full compliance with all applicable antitrust, competition and fair dealing laws. Therefore, employees must at all times adhere to the following rules: – Commercial policy and prices will be set independently and will never be agreed, formally or informally, with competitors or other non-related parties, whether directly or indirectly; Customers and suppliers will be dealt with fairly. All employees, especially those who are involved in procurement, or who are in regular contact with competitors, have a responsibility to ensure that they are familiar with applicable competition laws, Protection Against Unfair Competition Act 2000,(Act 589). When in doubt, the Legal Function should be contacted in order to provide competition law advice and training.

Confidential information

We value and protect our confidential information and we esteem the confidential information of others. Confidential information consists of any information that is not yet public information. It includes trade secrets, business and service plans, designs, databases, records, salary information and any non-published financial or other data. Aviance's sustained success hinges on the use of its confidential information and its nondisclosure to third parties. Unless required by law or authorized by their management, employees shall

not divulge confidential information or allow such disclosure. This obligation continues beyond the termination of employment. Furthermore, employees must use best efforts to avoid unintended disclosure by applying special care when storing or transmitting confidential information. Aviance respects that third parties have a similar interest in protecting their confidential information. In case that third parties, such as joint venture partners, suppliers or customers, share with Aviance confidential information, such information shall be treated with the same care as if it was Aviance's confidential information. In that same spirit, employees shall protect confidential information that they have obtained in the course of their employment.

Fraud, protection of company assets, accounting

We insist on honesty and we respect the Company's assets and property. Employees must never engage in fraudulent or any other dishonest conduct involving the property or assets or the financial reporting and accounting of Aviance or any third party. This may not only constitute disciplinary sanctions but also result in criminal charges. Aviance's financial records are the basis for managing the Company's business and fulfilling its obligations to various stakeholders. Therefore, any financial record must be accurate and in line with Aviance's accounting standards. Employees shall safeguard and make only proper and efficient use of Aviance's property. All employees shall seek to protect Aviance's property from loss, damage, misuse, theft, fraud, embezzlement and destruction. These obligations cover both tangible and intangible assets, including trademarks, know-how, confidential or proprietary information and information systems. To the extent permitted under applicable law, the Company reserves the right to monitor and inspect how its assets are used by employees, including inspection of data and files kept on Company network terminals.

Bribery and corruption

We condemn any form of bribery and corruption. Employees must never, directly or through intermediaries, offer or promise any personal or improper financial or other advantage in order to obtain or retain a business or other advantage from a third party, whether public or private. Nor must they accept any such advantage in return for any preferential treatment of a third party. Moreover, employees must refrain from any activity or behaviour that could give rise to the appearance or suspicion of such conduct or the attempt thereof. Employees should be aware that the offering or giving of improper benefits in order to influence the decision of the recipient, even if he or she is not a government official, may not only entail disciplinary sanctions but also result in criminal charges. Improper benefits may consist of anything of value for the recipient, including employment or consultancy contracts for closely related parties. Employees must be aware that election laws in many jurisdictions generally prohibit political contributions by corporations to political parties or candidates. Any such contributions and any deviations from such policy must be approved by the Managing Director.

Gifts, meals, entertainment

Employees shall not be influenced by receiving favours nor shall they try to improperly influence others by providing favours. Employees shall not accept or offer gifts, meals, or entertainment if such behaviour could create the impression of improperly influencing the respective business relationship. When in doubt, the employee shall seek guidance from his or her Line Manager. No employee shall offer to or accept from any third party gifts taking the form of any of the following, whatever the value involved: – money, kickbacks etc or similar monetary advantages.

Discrimination and harassment

We embrace diversity and respect the personal dignity of our fellow employees. Aviance respects the personal dignity, privacy and personal rights of every employee and is committed to maintaining a workplace free from discrimination and harassment. Therefore, employees must not discriminate on the basis of origin, nationality, religion, race, gender, age or sexual orientation, or engage in any kind of verbal or physical harassment based on any of the above or any other reason. Employees who feel that their workstation does not comply with the above principles are encouraged to raise their concerns with the HR Department.

Reporting illegal or non-compliant conduct

We take responsibility for ensuring that we all act with integrity in all situations. Employees shall report any practices or actions believed to be inappropriate under this Code or even illegal to their Line Managers or the appropriate members of the Human Resources team. If it is appropriate, in view of the nature of the reported matter, reports of violations may be made directly to higher levels including the Managing Director. Where appropriate, complaints may be made on a confidential basis. All complaints shall be properly investigated. Aviance prohibits retaliation against any employee for such reports made in good faith, while it also protects the rights of the incriminated person.

The use of Alcohol and drugs

Aviance prohibits the use and possession of alcohol and illegal drugs at work premises during work hours. This is with the exception of alcoholic beverages served at company social functions, where prior permission should be obtained. We reserve the right to take action against anyone under the influence of alcohol or illegal drugs who fail to perform their duties adequately.

Safety

Aviance believes in providing and maintaining a safe and secure work environment. We are mandated to comply with all health and safety laws and regulations. All Aviance employees and contractors working on our premises, are expected to be aware of and comply with all health and safety requirements associated with their jobs. Employees who encounter or

observe any unsafe conditions or unhealthy work practices are to as part of their duty immediately report such safety lapses to their superior.

Failure to comply

It is each employee's responsibility to ensure full compliance with all provisions of this Code and to seek guidance where necessary from their Line Manager or from the HR Function. To "do the right thing" and to ensure the highest standards of integrity is each employee's personal responsibility that cannot be delegated.

Any failure to comply with this Code may result in disciplinary action, including the possibility of dismissal and, if warranted, legal proceedings or criminal sanctions. We will consult the Code, comply with its provisions and seek guidance where needed.