SHALIMAR FRESH
GROWING VALUE

Ethical Trading Policy

Our Commitments:

SHALIMAR FRESH LIMITED is committed to the highest ethical, legal, and professional standards in all aspects of our operations and across our supply chain. This Policy is anchored in *our Human Rights and Environmental Due Diligence (HREDD) commitments* and reflects our adherence to internationally recognized human rights, labour rights, and environmental standards, as well as all applicable Kenyan laws.

We conduct our business in accordance with: -

- *The International Labour Organization (ILO) Core Conventions*
- *The UN Guiding Principles on Business and Human Rights (UNGPs)*
- *OECD Guidelines for Multinational Enterprises*
- *Ethical Trading Initiative (ETI) base code, Fairtrade Standards, GRASP, and other relevant voluntary sustainability standards*
- *All applicable Kenyan legal and regulatory requirements*

Our commitment extends beyond compliance; we aim to uphold integrity, honesty, fairness, and responsible business conduct in all relationships with employees, suppliers, customers, and the communities in which we operate.

Purpose & Objectives:

The purpose and objective of this policy is to outline principles guiding employee, suppliers and other stakeholders' conduct, covering honesty, integrity, fairness, and legal compliance, while addressing areas like conflicts of interest, bribery, data protection, and social responsibility, serving as a framework for decisions to build trust, maintain reputation, and ensure a positive workplace.

Guiding principles:

In practice, SHALIMAR FRESH LIMITED employees both and senior management, middle and lower-level management, staff, suppliers and stakeholders will always be guided by the following code of conduct as a minimum:

- *Act in an ethical manner and comply with statutory and legal requirements, promoting good labour, ethical standards and environmental standards in all supply chain.*
- *Remain compliant to all applicable laws of the country and voluntary standards that we have subscribed to and open to both law enforcement officers and auditors for scrutiny.*
- *Comply with* ***Anti-Bribery Act Cap 79B and, Anti-Corruption and economic crime act laws of Kenya.***

- *Form an evaluation and selection criteria for all goods purchased, and services provided to SHALIMAR FRESH LIMITED through detailed analysis of external providers, researched and documented information.*
- *Encourage suppliers to follow a Code of Conduct based on the code developed by the Industries Best Practice standards such as Ethical Trading Initiative (ETI), Fairtrade, GRASP, etc. as SHALIMAR FRESH LIMITED we fully endorse principles set out in these standards.*
- *The Company will meet its obligation of paying all relevant government taxes as required (e.g., HCD license fees, KEPHIS ECS license fee, KRA, social security, PAYE, medical cover etc.) and accurate records kept.*
- *Comply with all economic sanctions and ant-money laundering regulations.*
- *No bribes shall be offered or accepted for any services or supply to and by SHALIMAR FRESH. This includes bribes to the auditors, threating and/or inducing the auditor to be dishonest.*
- *Any form of gift, appreciation of good work, airtime, lunch, money in order to get an order to supply is not permitted. Where necessary, gifts / appreciation shall be declared and should not be given directly but can be channelled through the departmental head. Systems and practices shall be in place to ensure gifts or entertainment are not excessive or inappropriate (of modest value occasionally) and that they never create a feeling of obligation or the impression of an obligation because this can be perceived as a bribe*
- *No deposits or bribes shall be collected for being employment or promotion, and employees are required to report any incident of bribery or corruption through the whistle blowing channel.*
- *Staff and stakeholders to disclose to the company any personal or professional connections with government officials.*
- *Disclose any act or potential conflicts of interest to the management.*
- *The company shall be committed to the principles of lawful and free competition based on the merits of products and services. All suppliers shall also abide by all applicable ant-trust and competition laws in country.*
- *The company commits to data protection act and shall not disclose any personal information without consent.*

Continuous Improvement: It is our commitment to continually improve implementation of the policy through *Monitoring performance against ethical trading objectives, Review and update procedures as necessary, and Engaging employees, suppliers, and other stakeholders in strengthening responsible business practices.*

Communication: This policy shall be communicated to all employees through induction and posting on notice boards and to all other stakeholders through emails and company website.

Signed: ..... **Date:** 01/12/2025

Andrew Hardy,
Managing Director.