

REAL PEOPLE KENYA LIMITED

Code of Ethics and Business Conduct

Table of contents

1.	Introduction	2
2.	Purpose	2
3.	Scope of the Code	2
4.	Ethics	2
4.1	The need for standard ethics	2
4.2	What are the fundamental ethical standards and values expected by Real People Kenya Limited?	2
5.	The Code of Conduct	3
5.1	Objective	3
5.2	Real People Kenya Limited Vision & Mission Statement	3
5.3	What we expect from employees (in their dealings with customers and suppliers)	3
5.4	What we expect from employees (in their relationships with each other)	4
5.5	What we expect from employees (in the performance of their duties)	4
5.6	What we expect from our employees (in their personal conduct)	5
5.7	Conflict of interest	5
5.8	Confidentiality	5
5.9	Use of Company resources assets time for personal purposes	5
5.10	Business principles	6

1. Introduction

This document comprises the Code of Ethics and Business Conduct of Real People Kenya Limited. Real People Kenya Limited strives to build business relationships characterized by integrity and ethical behaviour. In order to do so, we expect the same commitment to integrity and ethics from our shareholders, directors, employees, suppliers, customers and/or all other stakeholders, as well as in the interaction between our employees themselves.

2. Purpose

2.1 The purpose of the Code is the following:

- 2.1.1. To serve as a brief description of Real People Kenya Limited's core values;
- 2.1.2. To provide a framework for identifying conduct that is ethical and acceptable for the employees of Real People Kenya Limited who, effectively acts as its agents at all levels;
- 2.1.3. To serve as guideline to assist Real People Kenya Limited and its employees in attaining and maintaining ethical standards;
- 2.1.4. To create the context for the ethical use of authority; and
- 2.1.5. To support all efforts aimed at curbing moral degeneration.

3. Scope of the Code

The Code of Ethics and Business Conduct of Real People Kenya Limited applies to all directors, managers and employees, including temporary employees, part-time employees and casual employees of Real People Kenya Limited; and all customers, suppliers and / or service providers used by or acting on behalf of Real People Kenya Limited.

4. Ethics

Ethics refers to standards of conduct that indicate how one should behave and are based on the moral duties and virtues that arise from principles of "right and wrong."

The maintenance of acceptable ethical standards involves two aspects: the ability to distinguish right from wrong; and the commitment to do what is right.

4.1 The need for standard ethics

- 4.1.1. It ensures that all customers, suppliers and other stakeholders of Real People Kenya Limited are aware of the basic values cherished by the company, our managers and employees; and
- 4.1.2. it ensures accountability within Real People Kenya Limited in terms of the fundamental ethical values expected of our managers and employees.

4.2 What are the fundamental ethical standards and values expected by Real People Kenya Limited?

- 4.2.1. Real People Kenya Limited cherishes the following values and ideals:
 - 4.2.1.1. Absolute integrity;
 - 4.2.1.2. A culture of honesty;
 - 4.2.1.3. Loyalty;
 - 4.2.1.4. Professionalism;
 - 4.2.1.5. Acceptance of responsibility and accountability;
 - 4.2.1.6. A positive public image;
 - 4.2.1.7. Maintaining credibility;

- 4.2.1.8. High standards of service delivery;
- 4.2.1.9. A sense of pride in belonging to the business;
- 4.2.1.10. Sanctioning bad, and awarding good behaviour; and all other positive attributes contributing toward sound ethical standards.

5. The Code of Conduct

5.1 Objective

The primary purpose of the Code of Ethics and Business Conduct of Real People Kenya Limited is a positive one, being to promote exemplary conduct. Notwithstanding this, an employee shall be guilty of misconduct, and may be dealt with in accordance with the relevant disciplinary code and procedure if she or he contravenes any provision of the Code of Ethics and Business Conduct or fails to comply with any provision thereof.

The purpose of the Code is also to provide clarity and certainty about the responsibilities of the directors, managers and employees of Real People Kenya Limited with regards to business ethics.

5.2 Real People Kenya Limited Vision & Mission Statement

Real People Kenya Limited is a financial services company that provides a select range of products and services to emerging consumers and large business clients. Its mission is to be preferred provider of financial services for the emerging market in South Africa through innovative financial products in Real People Kenya Limited's competency areas. Real People Kenya Limited is the largest non-banking, privately owned and funded company trading in this highly competitive sector.

5.3 What we expect from employees (in their dealings with customers and suppliers)

5.3.1. All employees are expected to comply with Real People Kenya Limited's basic fundamental ethical standards, values and relentless commitment to Real People Kenya Limited's six key drivers:

- 5.3.1.1. People
To boast and build a strong entrepreneurial culture, extensive industry experience together with a clear understanding of employee's roles and responsibilities.
- 5.3.1.2. Presence
To provide clients with an increasing range of innovative financial services and solutions supported by a sophisticated and centralized management information system focusing on 100% efficiency of its outlets.
- 5.3.1.3. Systems
To focus on a culture of continuous improvement with world-class technologies employed to ensure that processes are able to change quickly and efficiently by developing sensible, real, practical and innovative solutions for clients.
- 5.3.1.4. Technology
To provide management with quality and real-time information, which enables Real People Kenya Limited to adapt in a timely manner to changes in the market environment.
- 5.3.1.5. Cost control
To produce effective and accurate consolidated management accounts; and to provide accurate cost control management through closely monitored budgets.
- 5.3.1.6. Effective collections
Ensure client support, by commitment to regular communication with clients and with the usage of cellular technology, to create a repayment

culture and focus on the generating of cash flow.

5.4 What we expect from employees (in their relationships with each other)

5.4.1. All employees are expected:

- 5.4.1.1. To co-operate fully with other employees to advance the interests of the company;
- 5.4.1.2. To refrain from favouring relatives and friends in work-related activities and never abuse her or his authority of influence other employees to do so, nor to be influenced to abuse her or his authority;
- 5.4.1.3. To use the appropriate channels to air her or his grievances or to direct representations;
- 5.4.1.4. To be committed to the optimal development, motivation and utilization of her or his staff and the promotion of sound labour and interpersonal relations;
- 5.4.1.5. To deal fairly, professionally and equitably with other employees, irrespective of race, gender, ethnic or social origin, colour, sexual orientation, age, disability, religion, political persuasion, conscience, belief, culture or language;
- 5.4.1.6. To refrain from party political activities or arguments in the workplace;
- 5.4.1.7. To show respect for the dignity of all their colleagues;
- 5.4.1.8. To treat diversity as an asset and help every person to reach his or her full potential;
- 5.4.1.9. To not attempt to intimidate fellow employees;
- 5.4.1.10. To recognize one another's right to freedom of association.

5.5 What we expect from employees (in the performance of their duties)

5.5.1. All employees are expected (as stipulated in each individual employment contract) to:

- 5.5.1.1. Comply with the service agreement, rules, procedures, standing practices, disciplinary code and standards of the company;
- 5.5.1.2. Carry out all lawful and reasonable instructions given to them;
- 5.5.1.3. Comply with the law;
- 5.5.1.4. Behave in an orderly and lawful manner;
- 5.5.1.5. Be honest and accountable in dealing with company funds and use of company property and other resources effectively, efficiently, and only for authorized official purposes;
- 5.5.1.6. Treat all other persons and their property with respect and strictly according to prescriptions;
- 5.5.1.7. Not to victimize or intimidate any other person;
- 5.5.1.8. As employees, to act in a sociably acceptable manner at any time, thereby safeguarding the company's image.

5.5.2. In addition:

- 5.5.2.1. Strive to achieve the objectives of Real People Kenya Limited cost-effectively and in the organisation's interest;
- 5.5.2.2. Be creative in thought and in the execution of his / her duties, seek innovative ways to solve problems and to enhance effectiveness and efficiency within the context of the law;
- 5.5.2.3. Be punctual in the execution of his / her duties;
- 5.5.2.4. Execute his / her duties with honesty, integrity and to the best of his / her ability;
- 5.5.2.5. Accept the responsibility to avail herself or himself of ongoing training and self-development throughout his / her career;
- 5.5.2.6. Promote sound, efficient, effective, transparent and accountable

administration;

- 5.5.2.7. Report to the appropriate authorities all incidents of fraud, corruption, theft and any other act which constitutes an offence, or which is prejudicial to the company.

5.6 What we expect from our employees (in their personal conduct)

5.6.1. All employees are expected:

- 5.6.1.1. During official working hours or otherwise, to dress and behave in a manner that enhances the reputation of the company;
- 5.6.1.2. To act responsibly as far as the use of alcoholic beverages or any other substance with an intoxicating effect is concerned - after hours as well as at work functions;
- 5.6.1.3. To not tolerate unethical behaviour in others and not to even create the appearance of improper conduct; and
- 5.6.1.4. To familiarize herself or himself with this Code of Ethics and Business Conduct, and to follow it.

5.7 Conflict of interest

5.7.1. All employees shall:

- 5.7.1.1. Not engage in any transaction or action that is in conflict with, or infringes on the execution of her or his official duties;
- 5.7.1.2. Recuse herself or himself from any official action or decision-making process which may result in improper personal gain; and this should be properly declared by the employee;
- 5.7.1.3. Not use her or his official position to obtain or accept private gifts or benefits for herself or himself during the performance of her or his official duties; nor does she or he accept any gifts or benefits when offered as these may be construed as bribes;
- 5.7.1.4. Declare all actual or potential conflicts of interest as soon as he or she is aware of them;
- 5.7.1.5. Not, without approval, undertake remuneration work outside her or his official duties or use office equipment for such work;
- 5.7.1.6. Not derive any advantages or personal gain during his or her employment with Real People Kenya Limited in the form of commission, money and gifts in any form without the company's written permission; and
- 5.7.1.7. If engaged in any stage of the procurement process, maintain the highest ethical standards.

5.8 Confidentiality

5.8.1. All employees shall:

- 5.8.1.1. Honour the confidentiality of matters, documents and discussions, classified or implied as being confidential or secret;
- 5.8.1.2. To refrain from discussing company business with non-employees as it could be of a sensitive or confidential nature;
- 5.8.1.3. Ensure that proper measures are taken for the storage and safeguarding of confidential or sensitive information to prevent unauthorized access, use or removal by any means and in any form (electrical, optical, magnetic or hard copy); and
- 5.8.1.4. Not use or disclose any company information that is restricted, proprietary or sensitive of nature for personal gain or the gain of others.

5.9 Use of Company resources / assets / time for personal purposes

5.9.1. All employees shall:

- 5.9.1.1. Obtain prior permission from the company for the use of any company resource, assets and time for personal purposes beyond the scope of normal use for the purpose of fulfilling the employees job requirements;
- 5.9.1.2. Utilize all company assets, materials, equipment only for official purposes, with the necessary care; and
- 5.9.1.3. Not waste resources, including time.

5.10 **Business principles**

5.10.1. Business will be carried on in a way that

- 5.10.1.1. Provides safe and healthy working conditions for its employees and contractors;
- 5.10.1.2. Encourages the efficient use of natural resources and promotes the protection of the environment;
- 5.10.1.3. Treats all employees fairly in terms of recruitment, progression, remuneration and conditions of work, irrespective of gender, race, colour, language, disability, political opinion, age, religion, or national origin;
- 5.10.1.4. Allows constructive work place structures and associations which provide employees with an opportunity to present their views to management;
- 5.10.1.5. Takes account of the impact of its operations and the local community and seeks to ensure that potentially harmful occupational health and safety, environmental and social effects are properly assessed, addressed and monitored;
- 5.10.1.6. Upholds high standards of business integrity and honesty, and operates in accordance with local laws and international good practise (including those intended to fight extortion, bribery and financial crime);
- 5.10.1.7. Conducts its activities, including production, distribution, and any waste disposal, in an environmentally sound manner;
- 5.10.1.8. Adopts minimum employment standards in accordance with internationally accepted good practice not to employ forced labour of any kind, not to employ children under 16 years and to provide wages which meet or exceed industry or legal national minimum levels; and
- 5.10.1.9. Ensures the maintaining of proper records and reports, and reliable financial and tax information relating to the company.

--oOo--