

CONDUCT CODE OF LOBBYING AFRICA LTD

- **OUR CONDUCT**

The Lobbying Africa LTD Code of Conduct is a working tool present in any and all action taken within the scope of our business. Shareholders, CEOs, Officers, Advisors and collaborators are under the aegis of this code that aims to define a standard behavior in the maximum of possible actions, thus maintaining the rigor, safety and high-quality standard expected at any time from our part. Although it covers almost all possible scenarios, it is natural that there are exceptional situations in which they are not contemplated, trusting on a high burden of responsibility and seriousness that is a mandatory requirement in any person linked to Lobbying Africa LTD to ensure, that the procedure adopted is the most correct, at every time.

- **INTEREST CONFLICTS**

At Lobbying Africa LTD we avoid conflicts of interest, any situation that may appear to indicate any conflict of interest, and anticipate any event generating similar conditions. In the case of any situation that may resemble one of these cases, the situation is immediately reported to the right person and the individuals of conflict are completely isolated from the plot in question.

- **BRIBERY, GIFTS AND FINANCIAL CRIME**

Integrity is one of the core values of our organization. We do not tolerate, condone or be complacent under any bribery circumstance in any form or by any means. It is strictly forbidden to receive any value or any form of advantage from any intervener in Lobbying Africa in order to obtain any benefit, advantage or change of processes outside the standard measures.

At Lobbying Africa LTD we are intolerant of financial crimes, so any crime committed by any member of any category in Lobbying Africa LTD initiates severe internal sanction processes; any crime committed or of public disclosure by any client arising from the connection period with our company is reason for immediate cessation of client-provider connection.

- **LEGAL, ETHICAL AND SANCTIONS RESTRICTIONS**

We abide by all legal restrictions in any country, middle or business sphere in which we operate. Any violation of these restrictions shall be automatically notified to the competent authorities.

We are an organization that excels by the presence of human ethics, work and corporate and institutional relations in our day-to-day life. We are totally transparent with our clients, guaranteeing the integral follow-up of all processes by all the surrounding parties.

Any legal or ethical infraction will result in sanctions, both by the competent entities and internal entities, and may result in the breaking of existing links.

- **ACCURACY OF REPORTING**

We deal with information every day, recognizing the absolute value of accuracy and precision. Thus, all reporting forms and reporting information inherent to any internal and external subject is subject to a

process of execution that obeys strict norms and that guarantee the highest accuracy, precision and truthfulness of all that can be reported.

- **DELEGATION OF AUTHORITY AND INTERNAL PROCEDURES**

Lobbying Africa LTD has a well-defined internal structure where the chain of power is fulfilled without the slightest flaw, only being given any step of requesting a possible authorization when it is granted on internally regulated means for this purpose. The responsibilities of each stakeholder are well defined, thus achieving an accurate accountability for any action taken at any time.

All working processes and delegation of powers are defined in a comprehensive internal regulation.

- **ASSET PROTECTION, INTELLECTUAL PROPERTY AND FRAUD**

All information and assets arising out of any procedure at any time by any means and treated by any element of Lobbying Africa LTD is processed with security measures of intellectual protection & protection of assets so that at no time the matter in question is changed, damaged or exposed in any way, unless by express will of the client. Any material that contacts Lobbying Africa LTD and appears to be fraudulent is immediately rejected and required to prove veracity.

- **CONFIDENTIALITY (TREATMENT OF INFORMATION AND COMMUNICATIONS)**

Derived from the nature of action of our company and scope of work we are aware of the extra need to guarantee total confidentiality, anonymity and treatment of any data on strong measures of protection from evasion the disclosure of them. All data processed, whether personal, corporate or otherwise, is encrypted and processed through its own channels and known only to the necessary minimum players, on a need-to-know basis.

All company communications, whether internal or external, are made through our own channels equipped with the latest and updated security measures that guarantee total confidentiality.

- **SAFETY & SECURITY**

All the services provided by Lobbying Africa LTD have a quality standard of absolute guarantee the security for all its participants in what is at reach of our company. All measures are taken and all movements in any process are taken care so that no fragility or possible threat to the work, structure and customers is viable.