

CODE OF CONDUCT OF LOBBYING AFRICA LTD

- **OUR CONDUCT**

The Lobbying Africa LTD Code of Conduct is a working tool that dictates the standards and rules present in any and all actions taken within the scope of our business. Shareholders, CEOs, Officers, Advisors and collaborators are under the aegis of this Code in all of their operations. The Code of Conduct aims to define rigorous, safe and high-quality standards, rules and regulations that apply to all possible behaviours and actions undertaken by Lobbying Africa LTD. The Code covers the breadth of possible scenarios, but it must be noted that there are exceptional situations in which the Code cannot be adhered to. In such situations, it is mandatory for any person linked to Lobbying Africa LTD to ensure that the situation in question is managed in light of the underpinning sentiment of this document, and builds on a sense of responsibility, seriousness, and safety.

- **CONFLICTS OF INTEREST**

At Lobbying Africa LTD we avoid conflicts of interest, as well as situations that could indicate potential conflicts of interest. These include conflicts related to personal, financial or other interests. At the same time, we seek to anticipate any event that could generate conditions conducive to conflicts of interest. In case a situation occurs in which a conflict of interest is detected or presumed, the situation is immediately reported to the Chief Ethical Officer and the CEO of Lobbying Africa LTD. The individuals associated with the conflict are immediately isolated from the business plot in question and are subject to internal procedures to maintain the transparency and legitimacy of the company and its operations.

- **BRIBERY, GIFTS, AND FINANCIAL CRIME**

Integrity is one of the core values of Lobbying Africa LTD. We do not tolerate bribery, nor do we act complacently under any such circumstances in any form or by any means. It is strictly forbidden to receive any monetary, procedural or other form of advantage, gain or benefit from any intervening party in Lobbying Africa LTD outside the standard measures laid down contractually and as part of standard business procedures. We are intolerant of financial crime in any form. Any crime committed by any member of any category in Lobbying Africa LTD initiates severe internal sanction processes. Any publicly disclosed or otherwise evident crime committed by any client or participating party that arises during the period in which there is a cooperation with Lobbying Africa LTD is reason for immediate cessation of client-provider relations.

- **LEGAL AND ETHICAL RESTRICTIONS AND SANCTIONS**

Lobbying Africa LTD abides by all legal restrictions in any country, middle or business sphere in which there are operations or other company-related activities. Any violation of legal restrictions are immediately and automatically reported to the competent authorities of the relevant sphere. We are an organization of excellence that abides by a strict code of human ethics, as well as a framework of business, corporate and institutional relations governed by legal compliance, transparency and integrity in our day-to-day operations. We are entirely transparent with our clients and stakeholders and guarantee an integral and comprehensive follow-up evaluation of all internal and external processes. Any legal or ethical infraction will result in immediate sanctions, by both the competent internal and external entities, and may result in the cessation of existing relations or links between Lobbying Africa LTD and the infracting parties.

- **STANDARDS OF REPORTING AND DOCUMENTATION**

We deal with information every day and fully recognise the absolute value of transparency, comprehensiveness, accuracy and truthfulness in our internal documentation and our reporting system. Therefore, the reporting system at Lobbying Africa LTD is subject to a set of strict norms that ensure the highest possible standards are met relating to transparency, comprehensiveness, accuracy

and truthfulness of the matters at hand. Lobbying Africa LTD guarantees these standards are met in both internal and external documentation and are also extended to the ongoing the documentation and processing of information related to projects undertaken.

- **DELEGATION OF AUTHORITY AND INTERNAL PROCEDURES**

Lobbying Africa LTD has a well-defined internal structure in which the chain of responsibility and authority is clearly defined. Internal procedures are governed by professionalism and integrity of all stakeholders. This encompasses a complex system of authorisation, which guarantees that all decisions are made in accordance with rules and regulations. The responsibilities of each stakeholder are clearly defined in internal documents, therefore achieving fully accurate accountability for all business-related actions undertaken at any time. All working processes, delegations of responsibility and nature of relationships are defined in comprehensive internal regulations that govern the workings of Lobbying Africa LTD. These internal regulations are subject to the standards laid out in the Code of Conduct at hand.

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

All information and assets arising from procedures related to Lobbying Africa LTD are processed adhering to security standards of intellectual protection and the protection of assets. Unless explicitly willed by the client, Lobbying Africa LTD does not change, damage or expose intellectual property or other assets. Any requests that reach us and appear to be fraudulent are immediately rejected and required to immediately prove veracity and legitimacy for any further relations to take place.

- **DATA PROTECTION AND CONFIDENTIALITY**

Lobbying Africa LTD proudly guarantees complete security and confidentiality in the treatment and processing of all data. All processed data, may it be personal, corporate or otherwise, is encrypted and processed through secure channels. All data, in particular personal data, is transmitted on a need-to-know basis and involves the minimal number of stakeholders needed to ensure the successful running of the business. Lobbying Africa LTD possesses the latest state-of-the-art technological security measures that guarantee total confidentiality. All personal data that is submitted to and processed by Lobbying Africa LTD is treated according to the standards derived from the General Data Protection Regulation (GDPR). This means that personal data is utilised solely for purposes relating to the business between the stakeholder and Lobbying Africa LTD. All personal data is stored securely and no personal or other data is forwarded to third parties without the explicit consent of the party in question. Persons can request to have all their personal data deleted securely at any time by contacting [info@lobbying.africa].

- **SECURITY AND SAFETY MEASURES**

All the services provided by Lobbying Africa LTD abide by strict quality standards, which guarantee where possible the security of all stakeholders and participants in business with or related to the company. All possible measures are taken to ensure that there are no internal or external threats posed to the work, the operations or the stakeholders of Lobbying Africa LTD. Furthermore, all internal and external relations are governed by the principles of respect and equality. Lobbying Africa LTD condemns all discriminatory behaviour, harassment or victimization in any form.