

CODE OF CONDUCT

Preliminary

Kogweno & Bubi Consultants Ltd is a UK based consultancy providing cross-border legal advisory services (non-reserved matters), strategic consulting solutions and practical support to individuals, families and diaspora clients navigating opportunities in both the UK and Kenya. With deep expertise in corporate structuring, regulatory compliance, cross-border transactions, and migration-linked business strategy, we provide practical, commercially focused solutions tailored to clients operating in increasingly globalised markets. Our approach combines technical excellence with a clear understanding of the legal and commercial landscapes in both the United Kingdom and Kenya, enabling our clients to make confident, informed decisions.

We have a great responsibility to provide our clients with the best possible- advice, while running our own operations in a responsible and sustainable manner. We pride ourselves on our strong corporate culture and on the core values we adopted long ago – quality and reliable service, business focus, and team spirit. We have long worked systematically on issues related to quality service delivery, equality, the work environment, the environment, anti-corruption, insider regulation, etc. and we have adopted a number of internal policies within these areas. This Code of Conduct outlines the expectations we have on our employees. It is designed to set out our existing expectations as well as the firm’s position on its responsibility to respect human rights.

Purpose of the Code of Conduct

This Code of Conduct provides guidance for all employees (including directors, associates, support staff, and temporary employees) and is used as a tool in the firm’s daily practice – both internally and in the course of conducting advisory services. The Code of Conduct sets out the principles that govern the firm in its role as an employer and its employees in their relationships with other employees, clients, suppliers, business partners, and society at large. The purpose of the Code of Conduct is to help the firm realise its core values. It seeks to translate these core values into tangible, comprehensive guidelines. How do we ensure *excellence* and the best possible quality in our work? How do we ensure that we keep the right business focus while still maintaining our *integrity*? How we *innovate* in service delivery? How do we ensure that our work is permeated by a strong and clear *team spirit*? The Code of Conduct’s guidelines not only refer to the legislation and regulations that govern the firm and its employees, but also to the firm’s wider expectations – both internal and external – that extend beyond mere legal compliance. While the Code of Conduct focuses on the most essential issues for the firm, it draws on the leading international standards for responsible business conduct, namely the UN Guiding Principles on Business and Human Rights.

The Code of Conduct has been adopted by the Board of Directors and will be reviewed from time to time to ensure that it remains relevant and reflective of the obligations, expectations and future development of the business.

Our Core Values

Our core values are– *excellence, integrity, respect, innovation* and *diligence*. We believe in forging lasting partnerships with our staff and clients and promote knowledge- sharing and cooperation between colleagues, practice groups, and offices. We endeavour to ensure that each client receives the best possible legal advice and each employee is availed the best possible work environment.

Excellence – We seek the highest quality and reliability in everything we do; this is an ambition that permeates the entire organization. This also means an ambition to engage in constant renewal and to drive development. Working with us should constitute a stamp of quality for our clients as well as our employees.

Integrity – Integrity is our working ethos in line with the prescriptions of professional ethics. This is an ambition to constantly deliver on our service promise, the values and policies that we adopt.

Innovation – We regard business consultancy as a tool to create success for our clients. This means that every employee is governed by two main objectives: developing both our clients' business and our own business in a long-term perspective. We have to constantly innovate to enable our clients achieve their business objectives.

Excellence – Excellence is the standard that defines how we think, advise, and deliver. We are committed to providing strategic, high-quality, and commercially minded solutions with professionalism, precision, and integrity at every stage of the client journey. Our approach combines deep expertise, responsiveness, and a cross-border perspective to ensure that every client receives not just a service, but trusted partnership and exceptional value that drives sustainable growth and long-term success.

Human Rights

The firm has a responsibility to respect human rights in the conduct of its operations and in its relationships. The firm's work related to human rights is therefore based on the following overarching principle:

Respect for human rights – We respect internationally-recognised human rights. Our respect for human rights means an undertaking not to cause, contribute to, or, through our business operations, be linked to negative effects on human rights. This means running our business based on values that include respect for internationally recognised human rights. This undertaking does not affect our employees' ability to act in the best interest of their clients according to the rules on professional ethics for lawyers.

Terms of Employment

The physical and psychosocial work environment

As a knowledge-based company, Kogweno & Bubi Consultants Ltd is dependent on the professional qualities and personal skills of its employees. We strive to be a good employer for all employees and to offer an attractive workplace infused with our core values. Our work related to the physical and psychosocial work environment is based on the following principles:

Zero tolerance against discrimination – We do not accept any form of discrimination based on gender, ethnicity, religion or other beliefs, disability or age. We take forceful action against any transgressions. We strive actively to promote equal treatment and increase diversity and equality.

A workplace characterised by respect and sensitivity – All employees are respectful in their treatment of others and treat other employees in the manner they wish to be treated themselves. All employees are loyal to the firm and to other employees. All employees act as good ambassadors for Kogweno & Bubi Consultants Ltd.

Safe and secure work environment – We strive continuously to ensure the best possible physical work environment. To promote a good psychosocial work environment, we offer regular training in stress management and encourage and contribute to preventive health-care. We believe in the importance of social activities and gatherings where our employees are able to create and maintain good relations with each other.

Responsible leadership and employee influence – Partners and support managers set good examples and exercise their leadership based on our core values and this Code of Conduct. Partners and support managers are also responsible for advising on matters linked to the Code of Conduct. Employee influence is encouraged, as it is of great importance that everyone contributes to reinforcing a sense of team spirit and the firm's True Partnership culture.

Zero tolerance for corruption

Partners are responsible for ensuring that the firm is jealously guarded against corrupt practices as more elaborates in our Anti-Corruption Policy.

Transport and travel – To reduce carbon emissions per employee in the long term, the firm ensures, where possible, that goods are delivered to and from its offices using the most environmentally sustainable means of transportation. When travelling for business, our employees select the means of transportation that is best suited for the trip, giving due regard to environmental considerations alongside other factors such as cost, time, and safety.

Purchasing goods and services – The firm considers its environmental impact when selecting every one of its goods and services. Relevant environmental requirements are a part of every procurement.

Waste – The firm maintains its level of sorted waste and strives to reduce its total amount of waste. Hazardous waste is handled in a manner that minimises negative environmental impact. All employees contribute to this work through routine use of the waste sorting facilities.

Energy consumption – The firm optimises its energy consumption in its Premises.

Money laundering and the financing of terrorism

All employees work actively to prevent the use of the business and its assignments for money laundering or terrorist financing. Central to these efforts is the ongoing need to establish good knowledge of clients and an understanding of the purpose of each assignment. The Director in charge of a matter is ultimately responsible for ensuring that new assignments are accepted in accordance with legislative provisions and the firm's policy. All employees undergo continuous training in this field.

Information Security, IT Security and Duty of Confidentiality

Our employees are duty-bound to maintain confidentiality and discretion regarding information we gain access to in our practice. All employees use safe information channels offered by the firm, and they are individually responsible for reporting any detected information security breaches or losses of information. The firm's employees should also report any incidents that may entail a risk of information being lost to their immediate partner or support manager. All employees uphold good information management, information safety and IT safety, and attend regular training within these areas.

Sexual Harassment Policy Statement

Kogweno & Bubi Consultants Ltd is committed to providing a safe environment for all its employees free from discrimination on any ground and from harassment at work including sexual harassment. We operate a zero tolerance policy for any form of sexual harassment in the workplace, treat all incidents seriously and promptly investigate all allegations of sexual harassment. Any person found to have sexually harassed another will face disciplinary action, up to and including dismissal from employment. All complaints of sexual harassment will be taken seriously and treated with respect and in confidence. No one will be victimised for making such a complaint.

Implementation of this policy

Kogweno & Bubi Consultants Ltd will ensure that this policy is widely disseminated to all relevant persons. All employees are individually responsible for complying with the Code of Conduct. Directors and Managers are responsible for ensuring that the other employees understand, have access to advice on, and act in accordance with, the Code of Conduct. The directors and support managers' responsibilities include providing regular training to employees on the contents of the Code of Conduct and its relevance to day-to-day operations. All new employees must be trained on the content of this policy as part of their induction into the company. Every year, we will require all employees to attend a refresher training course on the content of this policy. It is the responsibility of every manager to ensure that all his/her employees are aware of the policy.

Monitoring and evaluation

All employees are encouraged to report potential breaches of the Code of Conduct or the firm's other policies to their immediate partner or support manager. If an employee suspects that one of the firm's partners or support managers is in serious breach of this Code of Conduct, or that any of them have been involved in serious financial irregularities or serious irregularities involving the life and health of individuals, such suspicions may be reported to the Director, Legal and Operations or management of the affected client as a whistleblower requirement.

Adopted on 27th February 2026

Certified by: Josephine Kogweno
Director