

FIRST NATIONAL EQUITIES LIMITED

Company Code of Conduct

➤ Commitment to the Code of Conduct

The Board, management and all employees of the Company are committed to implementing the Company's core principles and values as stated in this Code of Conduct when dealing with, clients, regulators government authorities, creditors other employees and the community as whole. The Company is dedicated to delivering outstanding performance for clients, investors and employees. The Company aspires to be the leader in its field while operating openly, with honesty, integrity and responsibility and maintaining a strong sense of corporate social responsibility. In maintaining its corporate social responsibility the Company will conduct its business ethically and according to its values, encourage community initiatives, consider the environment and ensure a safe, equal and supportive workplace.

➤ Responsibilities to Shareholders and the Financial Community Generally

The Company is committed to delivering value to its shareholders and to representing the Company's growth and progress truthfully and accurately. The Company also complies with the spirit as well as the letter of all laws and regulations that govern shareholders' rights. The Company is committed to safeguarding the integrity of financial reporting and as such will openly promote and instigate a structure of review and authorization designed to ensure the truthful and factual presentation of the company's financial position. The company will prepare and maintain its accounts fairly and accurately in accordance with the accounting and financial reporting standards that represent the generally accepted guidelines, principles, standards, laws and regulations of the country.

➤ Responsibilities to Clients

Each employee has an obligation to use their best efforts to deal in a fair and responsible manner with each of the Company's clients. Each employee will assist the Company in the delivery of superior service and product quality clients and will follow the Company's procedures. The Company regards ethics, honesty and clear communication as the cornerstones of its reputation that allow the Company to build successful and lasting business relationships. The Company for its part is committed to providing the clients with fair value.

➤ **Employment Practices**

The Company will:

- Provide a workplace that is safe for employees and that complies in letter and spirit with workplace health and safety laws
- Promote equal opportunity for all employees at all levels of the Company irrespective of colour, race, gender, age, ethnicity or religious beliefs.
- Provide equal opportunity to all qualified individuals in recruitment, compensation, promotion, training and other employment practices.
- Provide opportunities for employee training and education by providing the opportunities in and/or outside the company
- Compensate all employees in a fair and ethical manner and where appropriate, in accordance with Company's employees services rules.
- Recognize the need from time to time to give or accept customary business courtesies in accordance with ethical business practices, however, employees will not solicit such courtesies and will not accept gifts, services, benefits or hospitality that might influence, or appear to influence, the employee's conduct in representing the Company.
- Not allow in any circumstances to use any inside information they come to know in the performance of their duty or otherwise
- Not tolerate the offering or acceptance of bribes, inducements or unauthorized commissions by any of its employees or officers.
- Not tolerate the misuse of Company assets or resources and employees will not use such assets or resources for their own benefit.
- Not tolerate employees being under the influence of illegal drugs or alcohol while on Company premises or while at work off Company premises.
- Seek to avoid conflicts of interest so that an employee's interests, or the interests of a family member of the employee, do not affect the way he or she handles the Company's business.
- Unless, otherwise agreed in writing between the Company and the employee, expect employees to work exclusively for the Company.

➤ **Obligations Relative to Fair Trading and Dealing**

The Company aims to conduct its business fairly, strives to deal fairly with the Company's customers, suppliers, competitors and employees and encourages its employees to strive to do the same. Employees are prohibited from taking unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other practice that involves unfair dealing. In its competitive environment, the Company will compete fairly and ethically and in accordance with the competition laws of the country. It will compete solely on the qualities of its services. The Company deems false statements, misleading statements or innuendo as being inappropriate and unacceptable.

➤ **Responsibilities to the Community**

▪ **The Environment**

The Company is committed to conducting its business in accordance with the spirit and letter of all applicable environmental laws and regulations. To this end the Company encourages all employees to have regard for the environment when carrying out their duties.

▪ **Community Activities**

All employees are encouraged to engage in activities beneficial to their local community. While normally these activities should occur outside work hours, employees may occasionally engage in community activities during work hours with the approval of the board as long as the activities do not interfere with the employee's job responsibilities.

▪ **Donations and Sponsorship**

The Company does encourage all employees to make donations to community organizations from their personal funds. However, it should be made clear that all such donations are from the employee personally and not from the Company.

➤ **Responsibility to the Individual Privacy**

The Company receives private information from its employees. Unless required by law, such personal information will not be shared with a third party without the consent of the employee. Within the Company, personal information on employees will only be provided on a "need to know" basis and will only be used for the purpose for which it was intended. Similarly, employees will often be furnished with personal information from clients, and investors. Unless required by law, such personal information will not be shared with a third party without the consent of the person providing the information.

▪ **Confidential Information**

All employees must maintain the confidentiality of business information and protect it from any disclosure. This obligation of confidentiality applies while an employee as well as after ceasing to be an employee of the Company. Information that must be kept confidential includes internal, confidential or proprietary information related to the Company's business, technological and other knowledge, processes, computer passwords, computer software, product formulations, business strategies and plans, and information concerning the Company's operations, customers, vendors, suppliers and employees.

▪ **Conflicts of Interest**

Where an individual's private interests are variance in any way with the interests of the Company as a whole a conflict of interest exists. Further, a conflict of interest can be seen to exist where an employee or family member has a direct or indirect financial interest in, or receives any compensation/other benefit from, any individual or firm that:

- sells material, equipment or property to the Company;
- provides any service to the Company;
- has business dealings or contractual relations with the Company including leases and purchases; or
- is engaged in a similar business or competes with the Company.

Employees and Directors must avoid conflicts between personal interests and the interests of the Company, or even the semblance of such interests. Where an employee or Director is concerned that there may be a conflict of interest it should be discussed with the Company Secretary as soon as possible.

➤ **Identification of Non Compliance and its proceeding**

The Board, management and all employees of the Company are committed to implement this Code of Conduct. Therefore, it is up to each individual to comply with the Code and they will be accountable for any non compliance.

Where any client, creditor or any employee is concerned that there has been a violation of this Code, he will report it in writing to the Company Secretary and where the complaint is against company secretary it can be reported to Chief Executive officer. The company secretary or the chief executive as the case may be, will, within three days from the receipt of complaint, refer the matter to the committee comprising Head of HR, Head of Admin and Head of concerned Department. The committee will investigate the matter and will also recommend any action/corrective measure. The record of the whole procedure will be kept safe and further it will be ensured that no one making such complaint will be subject to any form of retribution.