

# Code of Conduct

## Purpose

The code of conduct sets out the commitment of ICS to conduct its affairs in a manner that meets not just the letter of applicable laws and regulations but also their spirit. The Code applies to the Company and to its individual directors, employees and sub-contractors and others who act on the Company's behalf.

## The Policy

In all its business activities, ICS complies with applicable laws and regulations and acts in an ethical, sustainable and socially responsible manner. In this regard:

- (i) ICS's business information is communicated accurately and fully, both internally and externally;
- (ii) Accounting records are correctly and accurately maintained in accordance with applicable accounting standards;
- (iii) ICS is against all forms of corruption, including bribery, facilitation payments, fraud, collusion, false accounting, insider dealing and money laundering. ICS prohibits any corrupt activity in the Company's business activities and requires all directors, employees and sub-contractors who act on behalf of the Company to adhere strictly to this prohibition;
- (iv) ICS competes in a fair and proper manner within the framework of competition rules in the markets in which the Company operates;
- (v) In the event of a conflict of interest being identified, whether actual, apparent, potential or perceived, ICS will take action to mitigate, avoid or manage the situation to ensure that client interests are not damaged.
- (vi) ICS conducts its business in a way that clients, suppliers and partners can have trust in the Company;
- (vii) ICS does not support individual political parties or individual politicians;
- (viii) ICS shows respect for all individuals and endeavour to ensure a safe and healthy working environment characterised by equality and diversity.

## Implementation of the Policy

Overall responsibility for the implementation of the Code of Conduct rests with the Board. The Board will ensure that this policy and its associated requirements are understood and implemented throughout the Company through communication and training. The Board will also ensure that the policy is communicated to all consultants, sub-contractors and representatives of the Company and require them to adhere to the ICS Code of Conduct when doing business with or on behalf of the Company.

## Associated Policies and Procedures

The following associated policies and procedures have been adopted in support of the Code of Conduct:

- Conflicts of Interest Policy
- Compliance with the Law
- Business Gifts and Hospitality
- Anti-bribery
- Protection and Proper use of Company Assets
- Confidentiality
- Media and Public Discussions

  
**Andrew Kasekende**  
Director

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