

# FITC ENERGY GROUP

*Est. 2024*

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## Code of Conduct

*Our Commitment to Integrity, Ethics & Excellence*

Version: 1.0

Effective Date: 1 January 2025

Approved by: Board of Directors

**Classification: Confidential — Internal Use Only**

## 1. Message from Leadership

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At FITC Energy Group, we believe that how we conduct our business is just as important as the business we conduct. Since our founding in 2024, we have been committed to building an energy company that the global community can trust — one that operates with transparency, accountability, and an unwavering respect for people and the planet.

This Code of Conduct is the foundation of that commitment. It applies to every director, officer, employee, contractor, and representative of FITC Energy Group, across all operations and geographies. We ask each of you to read it carefully, understand it fully, and live it daily.

When in doubt, ask yourself: Would I be comfortable if this decision appeared on the front page of a newspaper? If not — do not proceed.

— **Board of Directors, FITC Energy Group**

## 2. Scope and Application

This Code applies to:

- All full-time and part-time employees of FITC Energy Group
- Board members and senior executives
- Contractors, consultants, and agents acting on behalf of FITC Energy
- Joint venture partners and subsidiaries where FITC Energy holds a controlling interest

Operations conducted in all jurisdictions — including Kenya, East Africa, West Africa, and international markets — are subject to this Code, as well as applicable local laws and regulations.

## 3. Our Core Values

Everything we do at FITC Energy Group is guided by five foundational values:

Field	Details
Integrity	We act honestly and transparently in all dealings with colleagues, clients, regulators, and communities.
Safety	We place the health, safety, and well-being of our people and the environment above all operational pressures.
Excellence	We pursue the highest standards in every aspect of our work — from exploration to delivery.
Accountability	We take ownership of our actions and their consequences, and we hold each other to the same standard.
Community	We invest in the people and environments in which we operate, creating lasting positive impact.

## 4. Conflicts of Interest

A conflict of interest arises when personal interests interfere — or appear to interfere — with the interests of FITC Energy Group. All personnel must:

- Avoid situations where personal, financial, or family interests could influence business decisions
- Disclose any potential conflict of interest to their line manager or Compliance Officer promptly
- Recuse themselves from any decision-making process where a conflict exists or may be perceived

Examples of conflicts include: holding a financial interest in a supplier or competitor; employing or directing business to a family member without disclosure; and accepting gifts or entertainment that could influence a business decision.

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## 5. Gifts, Hospitality & Entertainment

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FITC Energy Group personnel may only give or receive gifts and hospitality that are:

- Modest in value (not exceeding USD 100 or local equivalent per occasion)
- Not given or received in exchange for a business favour or decision
- Recorded in the company's Gifts Register
- Consistent with applicable laws and the Anti-Bribery & Corruption Policy

Cash gifts, gifts in kind with significant monetary value, and any hospitality from or to government officials must be pre-approved by the Compliance Officer.

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## 6. Confidentiality & Data Privacy

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Employees handle commercially sensitive and personal data as part of their duties. All personnel are required to:

- Protect confidential information from unauthorised disclosure
- Use company data only for legitimate business purposes
- Comply with the FITC Energy Data Protection Policy and applicable privacy laws, including Kenya's Data Protection Act 2019
- Report any suspected data breach immediately to the IT Security team and Compliance Officer

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## 7. Fair Competition & Anti-Trust

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FITC Energy Group competes vigorously but fairly. We comply with all applicable competition and anti-trust laws. Employees must never:

- Agree with competitors on pricing, market allocation, or bid-rigging
- Exchange commercially sensitive information with competitors
- Abuse any dominant market position

If you are uncertain whether a communication or arrangement with a competitor is permissible, consult the Legal & Compliance team before proceeding.

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## 8. Human Rights & Labour Standards

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FITC Energy Group is committed to respecting human rights across all our operations and supply chains, consistent with the UN Guiding Principles on Business and Human Rights. We:

- Prohibit all forms of forced labour, child labour, and human trafficking
- Ensure fair wages and safe working conditions for all employees
- Respect the rights of workers to freedom of association and collective bargaining
- Conduct human rights due diligence on high-risk suppliers and partners

## 9. Reporting Concerns & Non-Retaliation

FITC Energy Group maintains a confidential Ethics Hotline available to all employees, contractors, and third parties. Concerns may be reported:

- Via the Ethics Hotline:
- To the Compliance Officer directly
- Anonymously through the company's whistleblowing portal

FITC Energy Group strictly prohibits retaliation against any person who, in good faith, reports a concern or participates in an investigation. Any act of retaliation is itself a serious disciplinary offence.

## 10. Consequences of Non-Compliance

Breaches of this Code will be investigated and may result in disciplinary action up to and including termination of employment, cancellation of contracts, and referral to law enforcement authorities. The severity of consequences will depend on the nature, gravity, and circumstances of the breach.

FITC Energy Group reserves the right to recover losses and seek damages in cases of serious misconduct.

## Acknowledgement & Sign-Off

I, the undersigned, acknowledge that I have read, understood, and agree to comply with the FITC Energy Group Code of Conduct.

Field	Details
Full Name	
Job Title / Role	
Department / Business Unit	
Signature	
Date	