



**BUSINESS CODE  
OF CONDUCT**



# BUSINESS CODE OF CONDUCT

Code of Conduct Version 2  
Published by Epsilon Publishers Limited © 2023



Epsilon Publishers Limited is proud of our commitment in embodying the spirit of the United Nations Global Compact. We pledge to align our business operations to the United Nations Global Compact’s fundamental pillars of human rights, labour, environment and anti-corruption. To this end, we have signed the letter of commitment to the United Nations Global Compact, pledging to align our efforts to operate responsibly and to advance societal goals in tandem with the UN Sustainable Development Goals.



TRACE has completed a TRACEcertification due diligence review of Epsilon Publishers Limited. Certification by TRACE signifies that Epsilon Publishers Limited has completed internationally accepted due diligence procedures and has been forthcoming and cooperative during the review process. TRACEcertification underscores Epsilon Publishers Limited’s commitment to transparency in international commercial transactions.





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## Introduction



Epsilon Publishers are committed to the highest standards of business practice. Our code of conduct is the bedrock of safeguarding integrity and compliance across the business. Furthermore, the code of conduct promotes a company culture of integrity and excellence. The communication of this code of conduct endeavours to ensure a workplace and a workforce that is fully committed to doing business based on our values.

The code of conduct applies to the board, management, and all employees of Epsilon Publishers, including temporary and contractual staff that we engage from time to time, our suppliers, and business partners. The communication of this code of conduct forms part of our ongoing commitment to ensure that all our stakeholders are committed to engaging in fair and equitable business practices.

We remain cognisant of the fact that this code cannot anticipate every situation that may arise in the course of doing business. Therefore, we encourage our staff to use good judgment based on our company values. Our values require us to be open, fair, and honest and to act with integrity. In so doing, we become effective stewards and custodians of good business practices.

A handwritten signature in cursive script that reads "Mumbi Gichuhi".

R. Mumbi Gichuhi (Mrs.)  
Managing Director  
Epsilon Publishers Limited

## why the code matters

### Good governance

This code of conduct outlines the steps we have taken to align our business to best business practices regarding good governance and operations. This code of conduct applies to everyone working at Epsilon Publishers Limited, irrespective of the level of seniority. This includes all board members, employees, consultants, and temporary workers that Epsilon may hire from time to time. The code of conduct also defines our relationship with external stakeholders such as suppliers, partners, and clients. The advisory board of Epsilon Publishers oversees the code.

### Working with each other

We are committed to honesty, integrity, openness, and fair play in delivering our services. Accordingly, the onus is on all staff members to ensure that business operations, procurement, or staff recruitment are dealt with openly, fairly, and transparently. Similarly, this code applies to temporary and part-time staff employed by the Company.

### Working with others

This also covers the basic standard of conduct expected of all staff when working with third parties. This includes our suppliers, business partners and clients. It also spells out company policy on instances such as acceptance of business favours and conflict of interest in connection with the dispensation of duty.

### Caring for the environment

The Company is committed to operating in an environmentally responsible manner, from providing products and services to operating its offices and facilities, selecting suppliers, and other business activities.

Further, the Company complies with all applicable environmental laws and regulations and self-directed commitments to sustainable practices and environmental protection.





## A culture of excellence

- A Summary of the Code of Conduct
- Our Purpose
- Our Values
- Our Brand Promise
- To whom does this Code of Conduct Apply?



## **A culture of excellence**

### **A summary of the code of conduct**

The code of conduct articulates what we expect from everyone in terms of our behaviour and our actions. Commitment to this code of conduct is committing to our purpose, values, and brand promise.

### **Our purpose**

We create publications that drive positive social impact.

### **Our values**

To act with integrity  
To take responsibility for quality  
To deliver excellence

### **Our brand promise**

We create publications that drive impactful conversations.

### **To whom does this code of conduct apply?**

The code of conduct applies to the board, management, and all employees of Epsilon Publishers, including temporary and contractual staff that we engage from time to time, our suppliers, and business partners. The communication of this code of conduct forms part of our ongoing commitment to ensure that all our stakeholders are committed to engaging in fair and equitable business practices.





## **How to use the code of conduct**

- Decision Making and the Code of Conduct
- Compliance with the Code
- Sanctions
- Reporting

# How to use the code of conduct

## Decision-making and the code of conduct



We recognise that some situations may be difficult because a member of staff encounters a scenario that is not covered in this code of conduct. If this happens, s/he is encouraged to use good judgment, bearing in mind that s/he must not overstep his/her delegated authority. The simple decision-making framework below might help to make a good decision.

### Is this decision in line with the code?

#### What to consider

- Does the code deal directly with the issue at hand?
- Is my decision consistent with the values of the company?
- Could my decision create any form of reputational risk?

### Have I consulted with others and asked for information to help me make an informed decision?

#### What to consider

- Do I need to involve others, including my manager and/or other relevant colleagues?
- Is this an informed decision?
- Is there more information that I need before I can make a decision?

### Is this my decision within my authority?

#### What to consider

- Am I able to decide on behalf of the company?
- Do I need to escalate this issue to those who are authorised to make a decision?

What would I be comfortable with if the situation was written about in the press or shared on social media or in the community?

#### What to consider

- What would be the foreseeable consequences of this decision or situation?
- How would this play out if it came to the public domain?
- Would I take personal ownership of these outcomes?
- Is there any aspect of my decision-making that could pose a reputational risk for the company?

### Am I setting a good example?

#### What to consider

- How will this influence those whom I work with?

- Could my decision be misunderstood or does it have the propensity to be misunderstood?

### Is this the right thing to do?

#### What to consider

- Am I confident that my action is permitted by law?
- Is this decision consistent with our company values and ethos?
- Have I taken all the necessary steps to ensure that my decisions will create a fair outcome for all involved?

Being methodical and deliberate when considering solutions will help to deliver a positive outcome. On the other hand, acting with haste will result in making poor judgment, which would result in poor decision-making and negative consequences.

## Compliance with the code

It is the personal responsibility of each member of staff to comply with the code of conduct. The board and all members of staff shall sign a declaration of principle for this purpose. The ethics officer shall keep the signed code of conduct.

## Sanctions

The Company can take prompt remedial action in response to violations of the code of conduct. Any member of staff who will be subject to disciplinary action per the labour laws. The sanction may be a warning, letter of reprimand, transfer to another business department,

suspension from duty, and termination. The violation shall be reported to the relevant legal authorities if it is criminal.

## Reporting

Each member of staff must report any violation of the code. Employees will not be disciplined or retaliated against for reporting violations in good faith. Retaliation against any employee for reporting policy violations is strictly prohibited. Any member of staff who believes or has reason to believe that s/he has been subjected to retaliation or has witnessed retaliation must report the matter immediately.





## **Integrity in the workplace**

- Reporting and Speaking Up
- Retaliation
- Equal Opportunity
- Harassment
- Bullying
- Conflict of Interest
- Misuse of Official Position
- Handling of Classified or Proprietary Information
- Confidentiality
- Privacy
- Record Keeping
- Protection and Proper Use of Company Assets
- Financial Reporting
- Money Laundering
- Insider Trading
- Information Technology
- Internet Use
- Use of Social Media
- Health and Safety

# Integrity in the workplace

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## Reporting and speaking up

Each one of us must uphold and maintain our culture of integrity. To this end, speaking up goes a long way in identifying and addressing and dealing with issues. We encourage all our staff to ask questions and to raise issues without fear of retaliation. We are committed to treating reports seriously and investigating them thoroughly.

Employees must report suspected unethical, illegal, or suspicious behaviour immediately. The Company does not tolerate retaliation against anyone who makes a report in good faith or assists with an investigation or audit.

To report a concern, you may make a confidential report at [report@epsilon.co.ke](mailto:report@epsilon.co.ke)

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## Retaliation

Employees who report a concern in good faith cannot be subjected to any adverse employment action, including

- unfair dismissal, demotion, or suspension
  - unfair denial of a promotion, transfer, or other employment benefits
  - bullying or harassment in personal or online
  - exclusionary behaviour
  - any other behaviour that unduly singles out the person unfairly
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## Equal opportunity

The Company is an equal opportunity employer. Accordingly, employment opportunities within the Company are available to everybody regardless of ethnic background, religion, sex, disability, or another constitutionally protected status. This principle applies to all aspects of employment, including, but not limited to, hiring, training, work assignment, promotion, transfer, termination, and salary administration.

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## Harassment

The Company has a zero-tolerance policy for any form of harassment, including sexual harassment and bullying. Fellow employees, customers, business partners, and other stakeholders must always be treated with dignity and respect.

Any type of harassment, including physical, sexual, verbal, or other, is prohibited and can result in disciplinary action up to and including termination or persecution if the abuse is criminal.

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Harassment can include actions, language, written words or an object that creates an intimidating or hostile work environment, such as:

- shouting at or humiliating someone
  - physical violence or intimidation
  - unwanted sexual advances, innuendoes, invitations, or comments
  - visual displays such as actual body parts, derogatory or sexually-oriented pictures or gestures
  - physical conduct, including assault and unwanted touching
  - threats or demands to submit to sexual requests made verbally, online, or on the telephone by short text message- as a condition of employment or to avoid negative consequences.
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## Bullying

We are committed to ensuring that our employees, contractors, and customers work in a safe, respectful, bullying-free environment. Bullying can include:

- spreading malicious rumors or gossip aimed at assassinating the character of an employee
  - excluding or isolating someone socially
  - establishing impossible deliverables
  - withholding necessary information or purposefully giving the wrong information
  - intimidating someone
  - impeding someone's work
  - unfairly denying training, leave or promotion
  - constantly changing work guidelines
  - Sending offensive jokes or email
  - criticising or belittling someone constantly
  - tampering with a person's personal belongings or work equipment
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## Conflict of interest

A conflict of interest will arise when an employee's private interests compete or conflict with the interests of the Company. Private interests will include the financial and personal interests of the employee in question and/or their affiliations, including family members, close associates and friends, clubs and societies to which they belong, and any person(s) to whom they owe a favour.

Employees are forbidden from using their official position or any information made available to them in their duty to benefit themselves, their affiliates,

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or any other persons to whom they have personal or social connections. They should also avoid putting themselves in a position that may lead to an actual or perceived conflict of interest with the Company. Failure to avoid or declare any conflict of interest may give rise to criticism of favouritism, abuse of office, or allegations of corruption.

In particular, staff involved in the procurement process should declare a conflict of interest if they have a beneficial interest in any company being considered for selection as the supplier of goods or services. Appendix three (3) of this code provides examples of conflict of interest situations that staff may encounter.

When called upon to deal with matters of the Company for which there is an actual or perceived conflict of interest, the staff member should declare in writing to the ethics officer. He should then abstain from dealing with the matter in question and follow the instruction of the ethics officer, who may reassign the task to another staff member.

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### **Misuse of official position**

Staff who abuse their official position for personal gain, to obtain favours, or to favour their relatives and close associations are liable to disciplinary action or have their employment contracts terminated. Examples of abuse of office include giving undue favour and leaking information to give away an undue advantage.

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### **Handling of classified or proprietary information**

The staff of Epsilon is not allowed to disclose confidential or exclusive information to anybody without authorisation. Any member of staff who has access to or is in control of such information should always provide adequate safeguards to prevent its misuse or abuse. Examples of misuse include but are not limited to, disclosure of information in consideration of monetary rewards or use of the information for personal gain or interest. Unauthorised disclosure of any personal data may result in a breach of the applicable legislation on privacy.

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### **Confidentiality**

The Company and all its employees maintain the confidentiality of all proprietary information. As part of offering our services, we are privy to confidential information. How we use that confidential information is crucial. Accordingly, we are committed to handling that information respectfully and appropriately in tandem with our responsibilities.

Confidential information can include:

- supplier lists
- pricing information
- copyrights
- terms of contract
- company policies and procedures
- financial disclosures
- marketing plans and strategies
- trade secrets

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### **Privacy**

The Company complies with the requirements of the Republic of Kenya's privacy laws and international laws on the same. All employees sign an agreement that contains provisions for information confidentiality and non-disclosure.

The Company and its employees do not disclose private and personal information of

- employees
- customers
- suppliers
- partners
- competitors
- third parties

Employees store all personal information securely, mark it as confidential and store it for as long as it is needed for the purpose for which it was collected. When providing personal information, employees limit access to only those with a clear business need for the information.

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### **Record keeping**

All documents, databases, voice messages, mobile device messages, computer documents, files, and photos are records.

Members of staff are required to

- Maintain these records and protect their integrity for as long as is required;
- Maintain official record keeping systems to retain and file records required for business, legal, financial, research or archival purposes;
- Dispose of records according to the Company's records retention and disposal schedule.

Staff members should avoid destroying documents in response to or anticipating an investigation or audit.



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**Protection and proper use of company assets**

The Company requires all employees to protect its assets. All assets should be used for legitimate purposes, efficiently, and for company business only. Assets include facilities, equipment, computers, information systems, telephone, employee time, confidential and proprietary information, corporate opportunities, and company funds. Any staff member must use company property responsibly and conduct the Company's business. Misappropriation of company property for personal use or personal gain is prohibited. Suspected fraud, theft, negligence, and waste incidents should be reported to the Operations Manager.

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**Financial reporting**

All business transactions must be duly recorded to permit the preparation of clear financial statements in conformity with sound accounting principles. No false or misleading entries may be made in the books of account, and no employees may engage in any arrangement that results in such a prohibited act. Similarly, books of accounts and audited financial statements will not be falsified to present them as documentation for tender processes.

No undisclosed or unrecorded fund or asset of the Company shall be established for any purpose. No payment on behalf of the Company may be made without adequate supporting documentation or with the intention or understanding that any part of such payment is to be used for any purpose other than as described by the documents supporting the payment.

From time to time, the Company may publish or inform of policies on financial reporting, disclosure, and compliance to reinforce the financial reporting expectations of this code of conduct. All employees, at all levels, are expected to implement and adhere to these principles.

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**Money laundering**

The Company complies with anti-money laundering laws. For this code of conduct, money laundering conceals illicit funds by moving them through legitimate businesses to hide their criminal origin.

Employees must never knowingly facilitate money laundering and must take steps to prevent negligent use of the Company's business activities for these purposes. Employees are required to immediately report any unusual or suspicious activities or transactions, such as:

- attempted payments in cash or from an unusual financing source;
- arrangements that involve the transfer of funds to or from countries or entities not related to the customer or to the transaction;
- unusually complex "deals" that do not reflect a real business purpose;
- attempts to evade record keeping or reporting requirements.

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**Insider trading**

Employees may learn about the Company, associates, clients, business partners, or other companies outside the public domain. It is illegal for any individual to use information obtained this way for personal gain or to share it with others not authorised to receive such information.

Members of staff are prohibited from:

- Buying or selling securities based on non-publicly available knowledge gained in the course of business;
- Providing information or tips or encouraging another person to buy or sell securities based on inside information.

Employees are required to report suspected insider trading immediately to the operations department.

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**Information technology**

The Company expects its employees to help it safeguard all computer equipment and data against intentional malicious acts by individuals inside or outside the Company. Cyber-security training is provided to all employees to ensure compliance with computer security policies.

The Company safeguards against inappropriate access by individuals or groups untrained in correct company policies or procedures.

The Company does not use software for which it does not have a license.

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**Internet use**

The Company understands that occasional personal internet use during work hours is a reasonable request and allows this, within reason. Employees can ask for clarification from their managers if in doubt. However, the Company does not allow internet users to support a personal business or political venture or embarrass the Company and its customers.

Using the internet to browse gambling or pornographic sites is expressly forbidden and could lead to termination of employment.

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**Use of social media**

Social media provides opportunities to network and create exposure for the Company and brand. But there are risks associated with employees' use of it. Accordingly, the Company respects the right of employees to use social media for personal and professional purposes.

Employees are responsible for complying with company policies and procedures when communicating on social media. In addition, employees are accountable for any information they publish online.

Employees are required to:

- Reveal their relationship with the Company when commenting online on issues related to the Company;
- Respect the privacy of other employees and refrain from publishing photos of them without their consent;
- Ensure any information they post related to the company is accurate;
- Comply with the rules of the social media sites they use.

Employees must not:

- "Pretext", or pretend to be someone they are not online;
- Speak on behalf of the Company if they are not expressly authorised to do so;
- Share confidential information about the Company, its clients, stakeholders or suppliers;
- Post comments or pictures that could harm the Company's brand, reputation or commercial interests.

## Health and safety

The Company is committed, as far as possible, to providing an injury-free and illness-free work environment. We ensure that our workplace is environmentally sound and complies with the relevant laws and regulations safeguarding worker safety.

The Company conducts business as per applicable health and safety requirements and strives for continuous improvement in its health and safety policies and procedures.

All employees must comply with applicable health and safety laws, regulations, policies, and procedures and apply safe work practices at all times in all locations. Appropriate safety and health requirements must be communicated to visitors, customers, or contractors at any company location. In addition, employees must immediately report workplace injuries, illnesses, or unsafe conditions, including "near-misses."

*We endeavour to ensure that our workplace is environmentally sound in compliance with the relevant laws and regulations that seek to safeguard worker safety.*





## **Integrity in the marketplace**

- Level Playing Field
- Governance and Anti-Corruption
- Competition, Fair Play and Anti-Trust
- Bribery and "Facilitation: Payments
- Gifts and Entertainment
- Political Contributions
- Charitable Contributions
- Restrictive Agreements with Third Parties
- Contracts and Services
- Acceptance of Advantages



# Integrity in the marketplace

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**Level playing field** Epsilon’s policy prohibits any anti-competitive practices. Accordingly, our employees cannot agree, formally or informally, with competitors and/or suppliers to fix prices or any other conditions of the transaction. Similarly, are expressly forbidden from performing any act of unfair competition by way of misappropriating the clients of a company by taking advantage of the relations established with such clients within the function previously held at the company; dismissing or attracting employees of a company to set up a competing company to capture customers of that company; hiring employees of a company with a view to crippling its workforce and paralysing its operations.

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**Governance and anti-corruption** Epsilon has zero tolerance for corruption. All employees are prohibited from offering anything of value to government officials or business partners to secure an undue advantage. The company also prohibits payment, offers of payment, promises of payment, and anything of value directly or indirectly to influence or obtain undue business and/or personal advantage.

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**Competition, fair play and anti-trust** While the company competes aggressively for new business, relationships with business partners are built upon trust and mutual benefits, and compliance with competition and antitrust laws.

All members of staff are required to

- communicate the Company’s products and services in a manner that is fair and accurate, and that discloses all relevant information.
- familiarise themselves with the Company’s fair competition policies and remain aware of the consequences of any violation of policies or laws governing fair competition.
- consult the Company’s lawyers before engaging in any new business practice that may affect fair competition.
- refrain from price fixing, bid rigging, and any other anti-competitive activities.
- use only publically available information to understand business, customers, competitors, business partners, technology trends, and regulatory proposals and developments.
- advise their manager of possible violations of fair competition practices at the earliest opportunity.

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## Bribery and “facilitation” payments

The Company has a zero-tolerance policy on bribery. The company will not attempt to influence the judgment or behaviour of a person in a position of trust by paying a bribe or a kickback. This applies to persons in government, not-for-profit organisations, and private businesses.

The Company does not permit “facilitation” payments to government officials, employees of not-for-profit organisations, or private businesses to secure or expedite routine actions.

All members of staff are expected to

- select third parties carefully and monitor them continuously to ensure that they comply with the company’s anti-bribery policies;
  - keep accurate books and records at all times and monitor that funds are not used for bribery or “facilitation” payments;
  - refuse any offer or request for an unlawful payment and report the incident to the Company’s ethics and compliance officer.
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## Gifts and entertainment

While gifts and entertainment among business associates can be appropriate ways to strengthen ties and build goodwill, the company also recognises that they have the potential to create the perception that business decisions are influenced by them. The Company is committed to winning and procuring business solely on its merit and on the merit of its products and services and complies with all legal requirements for giving and receiving gifts and entertainment.

Any gifts offered voluntarily to the staff in their official capacity are regarded as gifts to the company and they shall not be accepted without permission. By default, employees of the Company should decline the offer if the acceptance could be perceived to be against the interests of the Company, or lead to complaints of bias or impropriety.

For gift items offered to staff in their official capacity, and of low nominal value (below Kenya Shillings Two Thousand), the refusal of which could be seen as impolite, can be accepted as an exception. Under any other circumstances, staff should seek clearance in writing, within five (5) working days from the offer, and permission from the ethics officer to receive the gift.

The staff is to:

- use sound judgment and comply with the law regarding gifts and other benefits;
  - never allow gifts, entertainment or other personal benefits to influence the integrity of business relationships;
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- never accept gifts or entertainment that are illegal, immoral or would reflect negatively on the company;
- never accept cash, cash equivalents, stocks or other securities.

Members of staff may accept occasional unsolicited personal gifts of nominal value such as promotional materials and branded items. They may also provide the same to customers and business partners.

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### **Political contributions**

The Company is apolitical. Accordingly, we do not make political contributions. Members of staff are free to support any political party or entity in an individual capacity. However, this must be kept separate from company business.

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### **Charitable contributions**

The Company may from time to time make charitable contributions to causes and to organisations that are not politically affiliated.

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### **Restrictive agreements with third parties**

Epsilon does not condone activities that seek to gain unfair or undue competitive advantage. No individual in the company may engage in any activity that violates any valid restrictive agreements entered into by that individual for the benefit of a third party. By the same token, no individual may, directly or indirectly, use or disclose any confidential information or trade secrets of a third party that the individual obtained while employed by or associated with such a third party.

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### **Contracts and services**

Epsilon is committed to complying with all applicable laws and regulations relating to procurement procedures and to ensuring that all documentation that it submits is accurate and complete and that any deviations from the contract stipulations are properly approved.

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### **Acceptance of advantages**

Epsilon Publishers expressly forbid their employees from soliciting and/or accepting advantages from any persons having dealings with the business such as clients, suppliers, and contractors. Employees who wish to accept any advantages must seek advice and permission from the responsible ethics officer.

Any gifts offered voluntarily to the staff in their official capacity are regarded as gifts to the company and they shall not be accepted without permission. By default, employees of Epsilon should decline the offer if the acceptance could be perceived to be against the interests of the company, or lead to complaints of bias or impropriety.

For gift items offered to staff in their official capacity, and of low nominal value (below Kenya Shillings Two Thousand), the refusal of which could be seen as impolite, can be accepted as an exception. Under any other circumstances, staff should seek clearance in writing, within five (5) working days from the offer, and permission from the ethics officer to receive the gift.

The ethics officer should keep proper records of the applications and permissions. Each permission will indicate the name of the applicant, the occasion of the offer, the nature and estimated value of the gift, whether or not permission was granted to receive the gift, and if any directions were given to disposing of the gift. The permissions must be signed and dated by both the ethics officer and the applicant. Possible ways of disposal of such gifts are listed in Appendix 2 of this code.



*Any gifts offered voluntarily to the staff in their official capacity are regarded as gifts to the company and they shall not be accepted without permission.*



## **Corporate social responsibility**

- Partnerships
- Forced Labour
- Child Labour
- Responsible Environmental Impact
- Charity
- Environment



## Corporate social responsibility

The Company understands that corporate social responsibility extends to our entire supply chain. This encompasses not only the products and services supplied but also the human rights, ethics, and social practices of our company and its suppliers.

### Partnerships

One goal of the corporate social responsibility procurement programme is to build partnerships with like-minded organisations by actively seeking out business partners who are the most environmentally and workforce friendly.

### Forced labour

The company and its suppliers shall employ all employees of their own free will with no one being subjected to bonded or forced labor. This policy applies to not only the supplier's business operations but also those of the supplier network with which the company conducts its business.

### Child labour

The company and its suppliers shall not employ any people under the minimum legal working age of the country in which they work.

### Responsible environmental impact

The company and its suppliers shall produce measurable environmental impact reports and conduct ongoing efforts to reduce environmental pollution while increasing sustainability.

The company encourages and supports involvement in the community that has supported it. This includes supporting local businesses and talent by, for example, sourcing local products and services, where appropriate, and showcasing the work of local artists in the company's public spaces.

### Charity

Charitable involvement is important to the company and a charity committee meets once a month to discuss and execute potential and ongoing charitable projects.

### Environment

The company is committed to operating in an environmentally responsible manner, from the provision of products and services to the operation of its offices and facilities, selection of suppliers, and other business activities. Further, the company complies with all applicable environmental laws and regulations as well as self-directed commitments to sustainable practices and environmental protection.



*The company understands that corporate social responsibility extends to our entire supply chain. This encompasses not only the products and services supplied but also the human rights, ethics and social practices of our company and its suppliers.*

# Appendix

## Definition of advantage

### Advantage refers to

- any gift, loan, fee, reward, or commission comprising money or any valuable security or of any other property or interest in a property;
- any office, employment, or contract;
- any payment, release, discharge, or liquidation of any loan, obligation, or other liability, whether in whole or in part;
- any other service, or favour, including protection from any penalty or disability incurred or apprehended or from any action or proceedings of a disciplinary, civil, or criminal nature, whether or not already instituted;
- the exercise or tolerance from the exercise of any right or any power or duty; and
- any offer, undertaking, or promise, whether conditional or unconditional or any advantage within the meaning of any of the preceding paragraphs above.

### Every employee commits not to

- solicit, accept, offer, promise, or pay a bribe either directly through a third party. This includes, but is not limited to "facilitation fees";
- accept transport, travel expenses, or accommodation that is not business related;
- any donations for parties, including farewell parties;
- solicit or accept personal discounts that are not available to all employees or the general public;
- offer or accept personal rebates or refunds as a result of the company's purchases. This includes, but is not limited to, the collection of loyalty points from companies that offer loyalty programmes.
- offer or accept excessive or inappropriate meals or entertainment. In principle, an excessive amount that you would not ordinarily spend on yourself.

Gifts provided should not give the appearance of unduly influencing, obligating the recipient, or providing an improper advantage to the company. Gifts or entertainment should not reflect adversely on the company or the recipient's company and such gifts should be given openly. The gift or entertainment should be accurately accounted for in the employee's expense report and on the company's books and records.

### Examples of ways to dispose of gifts presented to a member of staff in his/her official capacity:

- If the gift is perishable, for example, food or drink, it shall be shared among the office or during an activity that is organised by the Company.
- If the gift is an unusual item, it may be donated to a charitable organisation.
- If the gift is of historical interest, it may be donated to a museum.
- If the gift is suitable for display, it may be retained for display on the company's premises.
- If the gift is a personal item, and of a value lower than Kshs 2,000, it may be retained by the recipient.

### Examples of conflict of interest situations

- A member of staff has a financial interest in a company that is being considered for selection as the company's supplier of goods and services.
- A member of staff accepts frequent gifts from the company's suppliers or contractors.

## Acknowledgment of the code of conduct

- You have read the entire code of conduct and understand your responsibilities related to it.
- You have had the opportunity to ask questions to clarify any unclear aspects of the code.
- You agree to abide by its principles.
- You agree to report to the company any violations of the code.
- You agree to cooperate in any investigations of violations of the code.





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