



CODE OF CONDUCT FOR VENDORS AND SERVICE PROVIDERS

Sanlam requires that vendors and service providers and their facilities comply with all applicable laws, respect human rights, environmental conservation, the quality of products. Sanlam also expects that vendors and service providers will hold their business associates to the same standards contained in this Code.

I. Labour Practices:

Sanlam recognizes and respects that its vendors and service providers are independent entities and the exclusive employers of their employees. Sanlam expects them to comply with all the current labour legislations always and will respect the following:

A. Child Labour:

Vendors and service providers shall only employ workers that are above the legal minimum age as per the applicable laws. If the vendors and service providers employ workers under 18 but over the legal age, they must be able to demonstrate that such employment does not expose them to undue physical risks that can harm their physical, mental or emotional development.

B. Anti-Discrimination and Fair Treatment:

Vendors and service providers shall promote and maintain a workplace free from discrimination and treat their employees with fairness, dignity and respect. They shall not discriminate against their employees based on their caste, religion, disability, gender, sexual orientation, race, colour, ancestry, marital status or affiliation with a political group/party, religious organization, union membership or any majority/minority group.

Vendors and service providers shall adopt a strict no-tolerance policy with respect to any form of physical, sexual, psychological, or verbal harassment or abuse.

C. Forced Labour

Workers of vendors and service providers shall be free to leave work or terminate their employment upon reasonable notice. Vendors and service providers should not use forced or bonded labour in any form.

D. Safe and Healthy Working Conditions:

Vendors and service providers are expected to comply with all applicable laws and to make every possible endeavor to make the workplace, machinery, equipment and processes free from any risk to the personal safety of any person working in such workplace or with access to such equipment and process. Vendors and service providers should ensure, at a minimum, reasonable access to potable water and

sanitary facilities, adequate lighting and ventilation and fire safety. Vendors and service providers shall manage all health and safety risks to prevent employment injuries as well as to provide an accident-free environment.

II. Environment:

Vendors and service providers shall comply with the existing laws concerning the protection of the environment and, wherever possible, adopt environmentally friendly technologies and implement sound life-cycle practices.

III. Anti-Money Laundering and Countering Financing of Terrorists (CFT)

Sanlam expects the highest standards of ethical conduct in all its endeavors. Vendors and service providers should always be ethical in all aspects of their businesses, including their relationships, practices, sourcing and operations.

The Vendor agrees that he will remain in compliance with the Proceeds of Crime and Anti-Money Laundering Act and Prevention of Terrorism Act of the Republic of Kenya and all applicable anti-money laundering (AML) and CFT laws and regulations.

Sanlam expects that vendors and service providers will not offer any benefit, either in cash or in kind, to any officer or employee or any relative/associate of any officer or employee of Sanlam or of any of its associate companies, to facilitate its business with Sanlam.

E. Data Protection

1. The Vendor agrees that it will remain in compliance with the Data Protection Act of the Republic of Kenya and all applicable data protection laws and regulations including but not limited to;

- i. The Vendor shall conform at all times when performing their obligations with all Data Protection Legislation.
- ii. The Vendor shall obtain the written consent of the customer before collecting and sharing the customer information with Sanlam;
- iii. The Customer information shall be protected and shall not be unnecessarily disclosed to other parties.

2) The Vendor acknowledge that they may access Personal Data regarding any of their officers or customers, during the term and conduct of the Agreement. Each party is responsible for familiarizing itself with all legislation and/or regulations that apply to Personal Data (Data protection Act 2019) that may control or access in connection with this Agreement. The parties agree to comply with any and all applicable laws and regulations relating to the processing of Personal Data .

3) The Vendor shall only process, use or disclose data strictly for the purposes of fulfilling their obligations under this Agreement or when required by law or an order of court. In the event of a court process, the submitting party shall notify the other as soon as practicable before complying.

Ethical Conduct

To that end, the Vendor accepts to uphold the highest ethical standards and refrain from the following unethical practices:

Misrepresentation: The Vendor shall not make, publish or circulate any false or deceptive or misleading statement or representation in the course of providing the services to the company.

Fraud: The Vendor shall not condone, aid, facilitate or participate in any fraudulent activities. In the context of Sanlam, fraud includes (but is not limited to): Forgery in any form; misappropriation of funds, securities, supplies or others assets by fraudulent means; Falsifying records such as pay-slips, account statements, removing the documents from files and /or replacing it by a fraudulent note; Making fraudulent or false representations; Willful suppression of facts/deception (including concealment of errors); Utilizing company funds or assets for personal purposes; Authorizing or processing payments for goods not supplied or services not rendered; Destruction, disposition, removal of records or any other assets of the Company with an ulterior motive to manipulate and misrepresent the facts so as to create suspicion/suppression/cheating and as a result of which objective decision would not be arrived at; Dishonestly overstating or manipulating performance to enhance reward; Failure to report matters of fraud that comes to your attention and any other act that falls under the definition of fraudulent activity as per the law.

Conflict of Interest: All Vendors shall make full and fair disclosure of all matters that could reasonably be expected to impair their independence and objectivity or interfere with respective duties to their clients, prospective clients, and fellow Vendors. Vendors must ensure that such disclosures are prominent, are delivered in plain language, and communicate the relevant information effectively. Conflict of Interest may include a situation that has the potential to undermine the impartiality of the Vendor because of the possibility of a conflict between the Vendors self-interest, the Company's interest or the customer's interest or a situation in which the Vendor's responsibility to a third party, limits his ability to discharge his responsibility to the Company.

Defamation: The Vendor shall uphold the general principles upon which insurance business is founded and refrain from making, publishing or circulating, oral, electronic, written, or printed statements of a misleading or defamatory nature, which might cause members of the public to lose confidence in the Company, or any other insurance company, its policies or its agencies.

Holding Out to the Public: The Vendor shall hold him or herself well publicly and carry on business in "utmost good faith", in conformity with the relevant provisions of the Insurance Act and Laws of Kenya.

I/We hereby acknowledge that I/we have received this code and that I/we have read and understood the same.

Name of the Entity: _____

Name of the Authorized Signatory of the Entity: _____

Signature:

Date: _____