



CODE OF CONDUCT POLICY

INTRODUCTION

This code of conduct contains the general rules to be observed by all Mitchell Cotts Staff employees in order to maintain discipline and uphold the dignity of the office in which each serve. Appropriate disciplinary action shall be instituted against any employee who fails to adhere with the rules in accordance with the outlined disciplinary procedures. Employees of the company shall also be subject to the relevant provisions of other rules and instructions which may be issued by Heads of Departments or sectional heads aimed at amplifying the regulation for the general good of the company. Such rules shall include.

1. ETHICAL PRINCIPLES

- (a) Employees shall at all-time uphold Mitchell Cotts vision which is: -
“To become a regional leader in cargo logistics and be your preferred partner in our business”
- (b) All company employees must perform their duties with honesty, integrity and to the best of their abilities. They must not allow themselves to be unduly influenced by anything or anybody. They should endeavor to communicate openly, honestly and demonstrate a sense of commitment to achieving the optimum outcome to the interest of the company even under adverse or tempting conditions.
- (c) Mitchell Cotts employees must be courteous and obliging to customers. They must always give correct and timely information regarding the services of the company in performance of their duty. Any communication from the customer must be dealt with expeditiously and courteously. The employees must be accountable for their actions and decisions apart from appreciating positive criticism.
- (d) Employees shall be required to serve at such places as the company may determine and they shall devote themselves to their work during working hours. Employees’ responsibilities are not limited to those specified in his contract or appointment, as the company has prerogative to require an employee to perform any other duty which he/she is qualified based on the needs and operations of the company.
- (e) Employees shall use their skills and other capabilities to develop their potential in the company.
- (f) Employees shall not absent themselves from duty during official working hours, leave their appointed place of work, proceed to a place other than their duty station, exchange duty with other employees or alter their hours of duty without express permission of respective managers.



- (g) Employees are expected to share and declare any information they may have about personal or corporate conflict of interest to avoid a compromising situation with the company.
- (h) Employees shall not solicit for rewards / bribes before, during or after performing duty.
- (i) Employees shall uphold confidentiality and shall not disclose any information to the press, public or any unauthorized persons. They are also prohibited from extracting or destroying official records.
- (j) To avoid pecuniary embarrassment, employees shall at all times live within their means / income.
- (k) Employees should challenge others for unethical behaviors, report behaviors in conflict with this code but with care not to unnecessarily suppress any positive and constructive contributions and criticism.
- (l) Employees at Mitchell Cotts shall pay due regard to environmental and public health issues in and around the work place in order to promote health and safety.
- (m) It is all employees obligation to assist the company's management to realize its commercial and ethical obligations as set out in this code.
- (n) It is the responsibility of all employees to uphold and portray positive company image at all times.
- (o) Employees shall at all times take care of the company's property including that under their direct care.

MANAGERS OBLIGATIONS

- (a) All managers are responsible for the company's obligations.
- (b) By virtue of being in control of the business of the company, managers shall be responsible of communicating this code to staff under their jurisdiction and ensure that it is well understood and adhered to.



- (c) The manager shall continuously create and maintain awareness by all employees that the resources of the company including time are in limited supply. The resources must therefore be used sparingly and in a responsible manner.
- (d) The Managers must Endeavour in keeping the costs of the company at a reasonable level.

Managers shall not place themselves in a position where their personal interest could conflict with their duties and that of the company and in particular they shall;

- (a) Not divulge any information of the company to its competitors or otherwise making improper use of such information.
- (b) Not carry own business on their account where this is forbidden by the company.
- (c) Not accept gifts, bribes or any other corrupt unconscionable benefits.
- (d) Not use any information received by virtue of duty and which is not yet available to the public for their own gain or detriment of the company.



CODE OF BUSINESS PRINCIPLES

Services

Mitchell Cotts is committed to offering high quality services.

Shareholders

Mitchell Cotts will work closely with its shareholders by providing timely, regular and reliable information on our activities and financial situation and performance.

Business Partners

Mitchell Cotts is committed to establishing mutually beneficial relations with suppliers, customers and business partners. In our business dealings we expect our partners to adhere to business principles consistent with our own.

Corporate social responsibility

Mitchell Cotts vision in the area of Corporate Social Responsibility is to operate in an environment which is, socially and ethically responsible while upholding the Company's public policy mandate and respect to business commitment.

Mitchell Cotts is taking various steps to make Corporate Social Responsibility an integral part of its governance, planning and operations, apart from strengthen its capacity in CSR. The Board is committed to ensuring that our business practices adhere to the highest standards of corporate governance. In the communities we operate in, the company is actively involved in developmental activities including kind contributions towards various community development projects.

Environment

Mitchell Cotts makes environmental issues a genuine priority and incorporated proper environmental protection measures into all levels of transportation, air and sea, warehousing, to the sale and marketing of our services.

Business Integrity

Mitchell Cotts does not give or receive, whether directly or indirectly, bribes or other improper advantages for business or financial gain. No employee may offer, give or receive any gift or payment, which is, or may be construed as being an inducement or bribe. Mitchell Cotts accounting records and supporting documents must accurately describe and reflect the nature of the underlying transactions. No undisclosed or unrecorded account, fund or asset will be established or maintained.

Conflict Of interest



All employees of Mitchell Cotts are expected to avoid personal activities and financial interest, which could conflict with their responsibilities and that of the company.