

This is the Code-of Conduct policy statement of Kehui International Ltd

Message from the Managing Director

Kehui International Limited is committed to ensuring that it follows an ethical business policy in all of its activities. Doing things right is one of our most important values and to this end, we work hard to ensure that our products and services are provided in such a way that it has a positive impact on the experience of our customers, our community and society at large. This approach is followed in the UK or wherever in the world we, or our suppliers, operate.

We are clear about what we mean when we talk about doing things right. Not only do we provide products that are well made, fairly priced and of good quality, but it also means that every step we take in making those products is taken with ethics and integrity in mind. We source material from suppliers with a similar ethos and standards, ensuring our supply chain is of high integrity and in compliance with our code of conduct.

Doing things right is not optional for employees at Kehui International. Working here means making a commitment to uphold our company values and following the code of conduct outlined in this document. It is up to every one of us to uphold our values and strive to make us the very best supplier in our field.

Introduction

This code of conduct applies strictly to all employees and associates of Kehui International Limited. We will strive to ensure that our suppliers also meet our goals. Where they fall short we will seek to replace them.

Ethical Principles and Core Values

Our values can be summarised in the following points:

- Honesty
- Integrity
- Trustworthiness
- Respect for others
- Responsibility
- Accountability
- Obedience to the law
- Empathy
- Teamwork
- Commitment to the code

Decision Making and the Code of Conduct

In order to live our values, we should ask ourselves the following questions when making a decision:

- Is it legal?
- Does it comply with the code?
- Does it reflect our company values and ethics?
- Does it respect the rights of others?
- If you are unsure about any of the answers, ask.

Reporting/Speaking Up

The company encourages all employees to ask questions and raise issues without fear of retaliation and is 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 good faith report of suspected misconduct or otherwise assists with an investigation or audit.

To report a concern:

- Talk to your manager
- Talk to Human Resources

No Retaliation

As the company is committed to meeting the high standards it has set itself and encourages speaking out. It commits itself to ensuring there is no retaliation for reporting concerns of any kind. Anybody found guilty of this will be severely reprimanded.

Examples of unacceptable retaliatory behaviour include:

- Unfair dismissal, demotion or suspension
- Unfair denial of a promotion, transfer or other employment benefit
- Bullying and harassment, either in person or online
- Exclusionary behavior
- Any other behavior that singles out the person unfairly

Equal Opportunity

The company prides itself on being an international, multi-cultural organisation with a diverse workforce.

It will not tolerate discrimination based on race, colour, religion, gender, age, national origin, sexual orientation, marital status, disability or any other protected class.

Harassment

All fellow employees, customers, business partners and other stakeholders will be treated with dignity and respect at all times.

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

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

- Yelling at or humiliating someone
- Physical violence or intimidation
- Unwanted sexual advances or comments
- Visual displays such as derogatory or sexually-oriented pictures or gestures
- Physical conduct including assault or unwanted touching
- Requests to submit to sexual requests for advancement or to avoid negative consequences

Bullying

As a part of our commitment to fairness, we are committed to ensuring that our employees, our contractors and our customers work in a safe and respectful environment that is free of bullying. Bullying can include:

- Spreading malicious rumour or gossip
- Excluding or isolating someone socially

- Establishing impossible deliverables or impeding someone's work
- Withholding necessary information or purposefully giving the wrong information
- Intimidating someone
- Criticising or belittling someone constantly
- Tampering with a person's personal belongings or work equipment

Conflicts of Interest

A conflict of interest can occur when an employee's personal activities, investments or associations compromises their judgment or ability to act in the company's best interests.

It's important for employees to disclose any relationships, associations or activities that could create actual, potential, or even perceived, conflict of interest to their manager or Human Resources.

Confidentiality

The company is committed to maintaining information confidentiality and it is every employees' obligation to uphold this standard.

To this end, the company and its employees maintain the confidentiality of all proprietary information. Proprietary information includes all non-public information that might be harmful to the company and its customers and business partners if disclosed.

Confidential information can include:

- Customer lists
- Supplier lists
- Pricing information
- Terms of contracts
- Company policies and procedures
- Financial statements
- Marketing plans and strategies
- Trade secrets
- Any other information that could damage the company or its customers or suppliers if it was disclosed

Privacy

The company is committed to upholding the letter and spirit of the EU General Data Protection Regulation (GDPR).

The company and its employees do not disclose any private, personal information of:

- Employees
- Customers

- Suppliers
- Competitors
- Third parties

Employees store all personal information securely, mark it as confidential and store it only 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.

Employees are required to report any breaches of privacy, including the loss, theft of or unauthorised access to personal information, to their manager.

Competition, Fair Dealings and Anti-trust

While the company competes aggressively for new business, relationships with business partners are built upon trust and mutual benefits and are compliant with competition and anti-trust laws.

Employees 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 management before engaging in any new practice that may affect fair competition
- Refrain from price fixing, bid rigging, and any other anti-competitive activities
- Use only publicly available information to understand business, customers, competitors, business partners, technology trends, and regulatory proposals and developments
- Advise their manager immediately of possible violations of fair competition practices

Bribery and Facilitation Payments

The company will not attempt to influence the judgement or behaviour of a person in a position of trust by paying a bribe or kickback. This applies to all persons whether in government or private business.

The company does not permit facilitation payments to government officials or private business in order to secure or speed up routine actions.

Employees are to:

- Select third parties carefully and monitor them continuously to ensure they comply with the company's anti-bribery policies

- Keep accurate books and records at all times and monitor that funds are not being used for bribery or facilitation payments
- Refuse any offer or request for an unlawful payment and report the incident to the company's management

Gifts and Entertainment

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

Employees are to:

- Use sound judgement and comply with the law, regarding gifts and other benefits
- Never allow gifts, entertainment or other personal benefits to influence decisions or undermine the integrity of business relationships
- Never accept gifts or entertainment that are illegal, immoral or reflect negatively on the company
- Never accept cash, cash equivalents, stocks or other securities

Employees may accept occasional unsolicited personal gifts of nominal value such as promotional items and may provide the same to customers and business partners. When in doubt, employees should check with the management before giving or receiving anything of significant value.

Political Contributions

The company does not make political contributions. Employees are free to support any political party or entity on a personal level. However, this must be kept separate from company business.

Charitable Contributions

The company may make charitable contributions to causes and organisations as long as they are not politically affiliated. Employees should check with the management before making any charitable contributions on behalf of the company.

Record Keeping

All documents, databases, voice messages, mobile device messages, computer documents, files and photographs are records. The company keeps its books, records, accounts and financial statements in a complete, fair, accurate, understandable, detailed and timely manner.

Employees are required to:

- maintain these records and protect their integrity for as long as required
- maintain official record keeping systems to retain and file records required for business, legal, financial, research or archival purposes
- Employees should never destroy documents in response to, or in anticipation of, an investigation or audit.

Money Laundering

The company complies with anti-money laundering laws. Money laundering is the process of concealing illicit funds by moving them through legitimate businesses to hide their illegal origin or avoid legitimate taxation.

Employees must never knowingly facilitate money laundering or terrorist financing, and must take steps to prevent inadvertent 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 funds from an unusual financing source
- arrangements that involve the transfer of funds to or from countries or entities not related to the transaction or customer
- unusually complex deals that don't reflect a real business purpose
- attempts to evade record-keeping or reporting requirements

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

Internet Use

The company understands that occasional personal use of the internet during work hours is a reasonable request and allows this, within reason and not to excess.

Employees can ask for clarification from their managers if in doubt.

However, the company does not allow internet use to support a personal business (unless approved by senior management), political venture, or in such a way which will embarrass the company and/or its customers.

Use of Social Media

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. 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:


- 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
- Post derogatory comments about competitors' products even if the comments are correct

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. One goal of the corporate procurement programme is to build partnerships with like-minded organisations with similar policies towards their workforce and the environment.

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

The company and its suppliers shall not employ anybody who can be deemed to be a child and never under the minimum legal working age of the country in which they work.

Signed: 	William Kibart, Managing Director	Date:	19th October 2021
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