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FORWARDING, CUSTOMS CLEARING, AIRFREIGHT, SEAFREIGHT, IMPORTS, EXPORTS, WAREHOUSING, PROJECTS, LOGISTICS

Our Code of Ethics and Business Conduct

1. Our Statement of Core Values

1.1 Vision

To be a leading provider of Freight Forwarding services that is regionally and globally preferred.

1.2 Our Core Values

- Commitment
- Innovation
- Efficiency
- Reliability
- Service Excellence
- Integrity
- Accountability
- Results- Oriented
- Teamwork
- Customer Focus

1.3 Our Mission

To provide Logistics, Forwarding, Customs Clearing, Warehousing and Handling services internationally, regionally and nationally in manner that achieves total client satisfaction while maximising shareholders' interest and meeting staff aspiration.

Build Trust and Credibility

The success and long run survival of our business depends on the trust and confidence that we earn from our employees, clients, suppliers and shareholders. To this end we gain credibility by adhering to our commitments, displaying honesty and integrity in our quest to achieve our company goals solely through honorable conduct. Promises alone do not suffice but the manner in which we conduct business practices will show our commitment to our values. Thus we know that our stakeholders will ultimately judge us on what we actually do.

Our actions are determined by asking ourselves and truthfully answering the following questions:

- a) Will this course of action build trust and credibility for AWS?
- b) Will it help create a working environment in which AWS can succeed over the long term?
- c) Am I or one of us able to honour this commitment now and in the future?
- d) Will this commitment deliver and add value to our stakeholders?

We are cognizant of the reality that the only way we will be able to build, nurture and maximize trust and credibility is by honestly answering “yes” to the above questions and by being dedicated to working hard every day to build our trust and credibility.

Respect for the Individual

We agree that we all deserve to work in an environment where we are treated with dignity and respect. AWS is committed to creating such an environment because it brings out the full potential in each of us, which, in turn, contributes directly to our business success. We cannot afford to let anyone’s talents go to waste.

AWS is an equal employment/affirmative action employer and is committed to providing a workplace that is free of discrimination of all types from abusive, offensive or harassing behavior. Any employee who feels harassed or discriminated against should report the incident to his or her manager or the human resources department.

Create a Culture of Open and Honest Communication

At AWS everyone should feel comfortable to speak his or her mind, especially with regard to matters of ethics. Managers individually and collectively have a responsibility to create an open and supportive environment which encourages employees to feel comfortable to air such questions and report their concerns to management. We all reap tremendous benefits when our employees exercise their guaranteed rights to prevent mistakes or wrongdoing by asking the right questions at the right times.

AWS will investigate all reported cases of questionable or unethical behavior. The company will take appropriate action in every instance where improper conduct is proven to have occurred and we will not tolerate retaliation against employees who raise genuine ethics concerns in good faith.

For your information, AWS's whistleblower policy is as follows:

[Note to employer: This policy should have already been adopted as an addendum to the organization's handbook.]

AWS employees are encouraged, to initially alert their managers or the HR department about such issues, as most problems can be resolved swiftly at the departmental or operational level. However should this be impossible to do for whatever reason or if an employee is not comfortable with raising the issue with or through his or her manager or HR, he/she should approach AWS's Managing Director whose door is always open (as we operate with an open-door policy).

Set Tone at the Top

Management has the added responsibility for demonstrating, through their actions, the importance of this Code. In any business, ethical behavior does not simply happen; it is the product of clear and direct communication of behavioral expectations, modeled from the top and demonstrated by example. Again, ultimately, our actions are what matters.

To make our Code work, managers must be responsible for promptly addressing ethical questions or concerns raised by employees and for taking the appropriate steps to deal with such issues. Managers should not consider employees' ethics concerns as threats or challenges to their authority, but rather as another encouraged form of business communication. At AWS, we want the ethics dialogue to become a natural part of daily work.

Uphold the Law

AWS's commitment to integrity begins with complying with laws, rules and regulations where we do business. Further, each of us must have an understanding of the company policies, laws, rules and regulations that apply to our specific roles. If we are unsure of whether a contemplated action is permitted by law or AWS policy, we should seek the advice from the resource expert. We are responsible for preventing violations of law and for speaking up if we see possible violations.

Because of the nature of our business, some legal requirements warrant specific mention here:

- ✓ *The Customs & Excise Act*
- ✓ *Companies Act*
- ✓ *Income Tax Act*

Competition

We reiterate our dedication to ethical, fair and vigorous competition. We will market our products and services solely on the basis of their merit, superior quality, value addition to clients, functionality and competitive pricing. We will make independent pricing and marketing decisions and will not improperly cooperate or coordinate our activities with our competitors. We will not offer or solicit improper payments or gratuities in connection with the purchase of

goods or services for AWS or the sales of its products or services, nor will we engage or assist in unlawful boycotts of particular clients.

Proprietary Information

It is important that we respect the property rights of others. We will not acquire or seek to acquire by improper means a competitor's trade secrets or other proprietary or confidential information. We will not engage in unauthorized use, copying, distribution or alteration of software or other intellectual property.

Selective Disclosure

We will not selectively disclose (whether in one-on-one or small discussions, meetings, presentations, proposals or otherwise) any material non-public information with respect to AWS, its securities, business operations, plans, financial condition, results of operations or any development plan. We should be particularly vigilant when making presentations or proposals to clients to ensure that our presentations do not contain material non-public information.

Health and Safety

AWS is dedicated to maintaining a healthy environment. A safety quality and committee standard have been designed to educate you on safety in the workplace. If you do not have a copy of this manual, please see the HR department or the chairperson of the health and safety committee.

Avoid Conflicts of Interest

Conflicts of Interest

We must avoid any relationship or activity that might impair, or even appear to impair, our ability to make objective and fair decisions when performing our jobs. At times, we may be faced with situations where the business actions we take on behalf of AWS may conflict with our own personal or family interests. We owe a duty to AWS to advance its legitimate interests when the opportunity to do so arises. We must never use AWS property or information for personal gain or personally take for ourselves any opportunity that is discovered through our position with AWS.

Here are some other ways in which conflicts of interest could arise:

1. Being employed (you or a close family member) by, or acting as a consultant to, a competitor or potential competitor, supplier or contractor, regardless of the nature of the employment, while you are employed with AWS.
2. Hiring or supervising family members or closely related persons.
3. Serving as a board member for an outside commercial company or organization.
4. Owning or having a substantial interest in a competitor, supplier or contractor.
5. Having a personal interest, financial interest or potential gain in any AWS transaction.

6. Placing company business with a firm owned or controlled by an AWS employee or his or her family.

7. Accepting gifts, discounts, favors or services from a customer/potential customer, competitor or supplier, unless equally available to all AWS employees.

Determining whether a conflict of interest exists is not always easy to do. Employees with a conflict of interest question should seek advice and guidance from management. Before engaging in any activity, transaction or relationship that might give rise to a conflict of interest instance, employees must seek review from their managers or the HR department.

Gifts, Gratuities and Business Courtesies

AWS is committed to competing solely on the merit of our products and services. We should avoid any actions that create a perception that favorable treatment of outside entities by AWS was sought, received or given in exchange for personal business courtesies. Business courtesies include gifts, gratuities, meals, refreshments, entertainment or other benefits from persons or companies with whom AWS does or may do business. We will neither give nor accept business courtesies that constitute, or could reasonably be perceived as constituting, unfair business inducements that would violate the law, regulations or policies of AWS or our clients, or would cause embarrassment to or damage AWS's reputation.

Accepting Business Courtesies

Most business courtesies offered to us in the course of our employment are offered because of our positions at AWS. We should not feel any entitlement to accept and keep a business courtesy. Although we may not use our position at AWS to obtain business courtesies, and we must never ask for them, we may accept unsolicited business courtesies that promote successful working relationships and good will with the clients that AWS maintains or may establish a business relationship with.

Employees who award contracts or who can influence the awarding of business, who create specifications that result in the placement of business or who participate in negotiation of contracts must be particularly careful to avoid actions that create the appearance of favoritism or that may adversely affect the company's reputation for impartiality and fair dealing. The prudent course is to refuse a courtesy from a supplier when AWS is involved in choosing or reconfirming a supplier or under circumstances that would create an impression that offering courtesies is the way to obtain AWS business.

Meals, Refreshments and Entertainment

We may accept occasional meals, refreshments, entertainment and similar business courtesies that are shared with the person who has offered to pay for the meal or entertainment, provided that:

- They are not inappropriately lavish or excessive.

- The courtesies are not frequent and do not reflect a pattern of frequent acceptance of courtesies from the same person or entity.
- The courtesy does not create the appearance of an attempt to influence business decisions, such as accepting courtesies or entertainment from a supplier whose contract is expiring in the near future.
- The employee accepting the business courtesy would not feel uncomfortable discussing the courtesy with his or her manager or co-worker or having the courtesies known by the public.

Gifts

Employees may accept unsolicited gifts, other than money, that conform to the reasonable ethical practices of the marketplace, including:

- Flowers, fruit baskets and other modest presents that commemorate a special occasion.
- Gifts of nominal value, such as calendars, pens, mugs, caps and t-shirts (or other novelty, advertising or promotional items).

Generally, employees may not accept compensation, honoraria or money of any amount from entities with whom AWS does or may do business. Tangible gifts (including tickets to a sporting or entertainment event) that have a market value greater than \$100 may not be accepted unless approval is obtained from management.

Employees with questions about accepting business courtesies should talk to their managers or the HR department.

Offering Business Courtesies

Any employee who offers a business courtesy must assure that it cannot reasonably be interpreted as an attempt to gain an unfair business advantage or otherwise reflect negatively upon AWS. An employee may never use personal funds or resources to do something that cannot be done with AWS resources. Accounting for business courtesies must be done in accordance with approved company procedures.

Other than to our government clients, for whom special rules apply, we may provide non - monetary gifts (i.e. company logo apparel or similar promotional items) to our clients. Further, management may approve other courtesies, including meals, refreshments or entertainment of reasonable value, provided that:

- The practice does not violate any law or regulation or the standards of conduct of the recipient's organization.
- The business courtesy is consistent with industry practice, is infrequent in nature and is not lavish.
- The business courtesy is properly reflected on the books and records of AWS.

Set Metrics and Report Results Accurately

Accurate Public Disclosures

We will make certain that all disclosures made in financial reports and public documents are full, fair, accurate, timely and understandable. This obligation applies to all employees, including all financial executives, with any responsibility for the preparation of such reports, including drafting, reviewing and signing or certifying the information contained therein. No business goal of any kind is ever an excuse for misrepresenting facts or falsifying records.

Employees should inform Executive Management and the HR department if they learn that information in any filing or public communication was untrue or misleading at the time it was made or if subsequent information would affect a similar future filing or public communication.

Corporate Recordkeeping

We create, retain and dispose of our company records as part of our normal course of business in compliance with all AWS policies and guidelines, as well as all applicable regulatory and legal requirements.

All corporate records must be true, accurate and complete, and company data must be promptly and accurately entered in our books in accordance with AWS's and other applicable accounting principles, conventions, and standards.

We must not improperly influence, manipulate or mislead any unauthorized audit, nor interfere with any auditor engaged to perform an independent audit of AWS books, records, processes or internal controls.

Promote Substance over Form

At times, we are all faced with decisions we would rather not have to make and issues we would prefer to avoid. Sometimes, we hope that if we avoid confronting a problem, it will simply go away.

At AWS we must have the courage to tackle the tough decisions and make difficult choices, secure in the knowledge that AWS is committed to doing the right thing at all times. At times this will mean doing more than simply what the law requires thus we will adopt best global practices. Merely because we can pursue a course of action does not mean we *should* do so.

We are cognizant that although our guiding principles cannot address every issue or provide answers to every dilemma, they can define the spirit in which we intend to do business and should guide us in our daily conduct.

Accountability

Each of us is responsible for knowing and adhering to the values and standards set forth in this Code and for raising questions if we are uncertain about company policy. If we are concerned

whether the standards are being met or are aware of violations of the Code, we must contact the HR department.

AWS takes the standards set forth in the Code seriously, and any violations are cause for disciplinary action up to and including termination of employment.

Be Loyal

Confidential and Proprietary Information

Integral to our business success is our protection of confidential company information, as well as nonpublic information entrusted to us by employees, clients and other business partners.

Confidential and proprietary information includes such things as pricing and financial data, customer names/addresses or nonpublic information about other companies, including current or potential supplier and vendors. We will not disclose confidential and nonpublic information without a valid business purpose and proper authorization.

Use of Company Resources

Company resources, including time, material, equipment and information, are provided for company business use. Nonetheless, occasional personal use is permissible as long as it does not affect job performance or cause a disruption to the workplace.

All company employees and representatives are expected to behave responsibly and use good judgment to conserve company resources. Managers are responsible for the resources assigned to their departments and are empowered to resolve issues concerning their proper use.

Generally, we will not use company equipment such as computers, copiers and fax machines in the conduct of an outside business or in support of any religious, political or other outside daily activity, except for company-requested support to nonprofit organizations. We will not solicit contributions nor distribute non-work related materials during work hours.

In order to protect the interests of the AWS network and our fellow employees, AWS reserves the right to monitor or review all data and information contained on an employee's company-issued computer or electronic device, the use of the Internet or AWS's intranet. We will not tolerate the use of company resources to create, access, store, print, solicit or send any materials that are harassing, threatening, abusive, sexually explicit or otherwise offensive or inappropriate.

Questions about the proper use of company resources should be directed to your manager.

Media Inquiries

As AWS is an established company in our industry and community, from time to time, employees may be approached by members of the print or electronic media. In order to ensure that we speak with one voice and provide accurate information about the company, we should direct all media inquiries to the Managing Director. Any press release will have to be expressly approved by the Managing Director prior to its publication or issue.

Do the Right Thing

Several key questions can help identify situations that may be unethical, inappropriate or illegal. To help us determine whether we are doing the right thing we pose inter alia the following questions to ourselves:

- Does what I am doing comply with the AWS guiding principles, Code of Conduct and company policies?
- Have I been asked to misrepresent information or deviate from normal procedure?
- Would I feel comfortable describing my decision at a staff meeting?
- How would it look if it made the headlines?
- Am I being loyal to my family, my company and myself?
- What would I tell my child to do?
- Is this the right thing to do?