



Your G2B trading partner

**KENYA TRADE NETWORK AGENCY
(KenTrade)**

Code of Conduct and Ethics

For KenTrade Employees

January 2017

**A Commitment to abide by the requirements of the
Leadership and Integrity Act, 2012**

VISION

To be among the global leaders in trade facilitation through e-commerce.

MISSION

To facilitate trade by simplifying and harmonizing business processes through effective management of the TradeNet System and provision of related services for Kenya's global competitiveness.

CORE VALUES

- 1) Customer focus
- 2) Integrity
- 3) Efficiency
- 4) Equity
- 5) Accountability
- 6) Creativity and innovation
- 7) Teamwork

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THE SPECIFIC LEADERSHIP AND INTEGRITY ACT

(No. 19 of 2012)

Pursuant to Section 37 of the Leadership and Integrity Act, 2012 the Kenya Trade Network Agency (KenTrade) issues the Code of Conduct and Ethics which sets out in the schedule hereto, to be observed by and binding upon employees of the Kenya Trade Network Agency.

CODE OF CONDUCT

The Code of Conduct and Ethics for Employees

PART 1 – STATEMENT OF INTENT

The Code is established pursuant to section 37 of the Leadership and Integrity Act, 2012, which requires every public entity to prescribe to a Specific Code of Conduct and Ethics for Public Officers in the entity. The Code is intended to establish standards of integrity and ethical conduct in the leadership of Kenya Trade Network Agency by ensuring that employees respect the values, principles and the requirements of the Constitution in the discharge of their duties.

PART II - PRELIMINARY

1. CITATION

This Code may be cited as the Code of Conduct and Ethics for all employees of KenTrade.

2. INTERPRETATION

In this Code, unless the context otherwise requires –

“Act” means the Leadership and Integrity Act, 2012;

“Agency” means the Kenya Trade Network Agency - a State Corporation established through an Executive Order signed by the President, on 14th January 2011 and gazetted via Legal Notice No. 6 of 2011 on 28th January 2011;

“Business associate” means a person who does business with or on behalf of an employee of KenTrade and has express or implied authority from that employee;

“Code” means the Code of Conduct and Ethics for the Kenya Trade Network Agency.

“Commission” means the Ethics and Anti-Corruption Commission established under the Ethics and Anti-Corruption Act 2011;

“ Employee” means an employee of Kenya Trade Network Agency.

“General Code” means the Code prescribed under Part II of the Act.

“Personal interest” means a matter in which an employee has a direct or indirect pecuniary or non-pecuniary interest and includes the interest of his/her spouse, child, business associate or agent;

“Regulations” means the Regulations made by the Commission pursuant to Section 54 of the Leadership and Integrity Act, 2012;

“Spouse” means a wife or husband to an employee.

3. APPLICATION OF THE CODE

This Code applies to all Employees.

4. APPLICATION OF THE KENYA CONSTITUTION 2010, THE PUBLIC OFFICER ETHICS ACT 2003 AND THE HUMAN RESOURCE MANUAL

- (1) The provisions of Chapter Six of the Constitution shall form part of this Code;
- (2) Unless otherwise provided in this Code, the provisions of the Public Officer Ethics Act, 2003 and Human Resource Manual shall form part of this Code in so far as they conform to the provisions of the Leadership and Integrity Act, 2012.

PART III – REQUIREMENTS FOR COMPLIANCE WITH THE CODE

5. RULE OF LAW

- (1) An employee shall respect and abide by the Constitution of Kenya 2010 and other relevant laws;
- (2) An employee shall carry out the duties of his/ her office in accordance with the relevant law;
- (3) In carrying out the duties of his/her office, an employee shall not violate the rights and fundamental freedoms of any person unless otherwise expressly provided for in the law and in accordance with Article 24 of the Constitution.

6. PUBLIC TRUST

A Public Office is a position of public trust and the authority and responsibility vested in an employee shall be exercised by the Employees in the best interest of the Agency and the people of Kenya.

7. RESPONSIBILITY AND DUTIES

Subject to the Constitution and any other law, an employee shall take personal responsibility for the reasonably foreseeable consequences of any actions or omissions arising from the discharge of the duties of his/ her office.

8. PERFORMANCE OF DUTIES

An employee shall, to the best of his/ her ability —

- (1) carry out the duties of the office efficiently and honestly;
- (2) carry out the duties of the office in a transparent and accountable manner;
- (3) keep accurate records and documents relating to the functions

of the office; and

- (4) Report truthfully on all matters of the Agency.

9. PROFESSIONALISM

An employee shall —

- (1) carry out the duties of his/her office in a manner that maintains public confidence in the integrity of the office;
- (2) treat members of the public, staff and other state officers and employees with courtesy and respect;
- (3) not discriminate against any person, except as is expressly provided by the law;
- (4) to the extent appropriate to the office, maintain high standards of performance and level of professionalism within the Agency; and
- (5) If the employee is a member of a professional body, observe and subscribe to the ethical and professional requirements of that body in so far as the requirements do not contravene the Constitution, any other law or this Code.

10. FINANCIAL PROBITY

- (1) An employee shall not use his or her office to unlawfully or wrongfully enrich himself or herself or any other person;
- (2) Subject to Article 76(2)(b) of the Constitution, an employee shall not accept a personal loan or benefits which may compromise the employee in carrying out his or her duties;
- (3) An employee shall submit an initial declaration of assets and liabilities within thirty days of assuming office in the Agency

and thereafter bi-annually;

- (4) An employee shall not:
 - (a) evade paying taxes
 - (b) neglect their financial obligations

11. MORAL AND ETHICAL REQUIREMENTS

- (1) An employee shall observe and maintain the following ethical and moral requirements-
 - (a) demonstrate honesty in the conduct of his or her public and private affairs;
 - (b) not to engage in activities that amount to abuse of office;
 - (c) accurately and honestly represent information to the public;
 - (d) not engage in wrongful conduct in furtherance of personal benefits;
 - (e) not misuse public resources;
 - (f) not falsify any records;
 - (g) not sexually harass or have inappropriate sexual relations with other employees, staff of the Agency or any other person;
 - (h) not engage in actions which would lead to the employee's removal from the membership of a professional body in accordance with the law; and
 - (i) not neglect family or parental obligations as provided for under any law

12. GIFTS OR BENEFITS IN KIND

- (1) A gift or donation given to an employee on a public or official occasion shall be treated as a gift or donation to the Agency;

- (2) Notwithstanding subsection (1), an employee may receive a gift given to the employee in an official capacity, provided that —
 - (a) the gift is within the ordinary bounds of propriety, a usual expression of courtesy or protocol and within the ordinary standards of hospitality;
 - (b) The gift does not exceed an amount prescribed by the Regulations under the Act or any other law.
- (3) An employee shall not —
 - (a) accept or solicit gifts, hospitality or other benefits from a person who;
 - (i) is under investigation;
 - (ii) has a contractual relationship with the Agency
 - (iii) has any interest that is directly or indirectly connected with the employee's duties;
 - (b) receive a gift which has the potential of compromising his or her integrity, objectivity or impartiality; or
 - (c) accept any type of gift expressly prohibited under the Act.
- (4) Subject to section 13(2), an employee who receives a gift or donation shall declare the gift or donation to the Agency within fourteen days of receipt of the gift.
- (5) The Agency shall maintain a register of all gifts received by employees as provided for in the regulations.

13. WRONGFUL OR UNLAWFUL ACQUISITION OF PROPERTY

An employee shall not use the office to wrongfully or unlawfully acquire or influence the acquisition of property.

14. CONFLICT OF INTEREST

- (1) An employee shall use the best efforts to avoid being in a situation where his or her personal interests conflict or appear to conflict with the employee's official duties.
- (2) Without limiting the generality of subsection (1), an employee shall not hold shares or have any other interest in a corporation, partnership or other body, directly or through another person, if holding those shares or having that interest would result in a conflict of the employee's personal interests and the officer's official duties.
- (3) An employee whose personal interest conflict with their official duties shall declare the personal interests to the Agency.
- (4) The Agency may give directions on the appropriate action to be taken by the employee to avoid the conflict of interest and the employee shall comply with the directions; and refrain from participating in any deliberations with respect to the matter. Any direction issued by the Agency under this subsection shall be in writing.
- (5) Notwithstanding any directions to the contrary under subsection (4), an employee shall not award or influence the award of a contract to;
 - (a) himself or herself;
 - (b) the employee's spouse or child;
 - (c) a business associate or agent; or
 - (d) a corporation, private company, partnership or other body in which the officer has a substantial or controlling interest.
- (6) Where an employee is present at a meeting, and an issue which is likely to result in a conflict of interest is to be discussed, the employee shall declare the interest at the

beginning of the meeting or before the issue is deliberated upon.

- (7) A declaration of a conflict of interest under subsection (6) shall be recorded in the minutes of that meeting.
- (8) The Agency shall maintain a register of conflicts of interest in the prescribed form in which the affected employee shall register the particulars of the registrable interests, stating the nature and extent of the conflict.
- (9) For purposes of subsection (8), the registrable interests shall include:-
 - (a) The interests set out in the Second Schedule of the Act;
 - (b) Any connection with a person or a company, whether by relation, friendship, holding of shares or otherwise, which is subject of an investigation by the Agency;
 - (c) Any application for employment or other form of engagement with the Agency, by a family member or friend of the employee or by a corporation associated with the employee;
 - (d) Any application to the Agency, by a family member or friend of the employee, for clearance with respect to appointment or election to any public office;
 - (e) Any other matter which, in the opinion of the employee, taking into account the circumstances thereof, is necessary for registration as a conflict of interest.
- (10) The Agency shall keep the register of conflicts of interest for five years after the last entry in each volume of the register;
- (11) The Agency shall prepare a report of the registered interests within thirty days after the close of a financial year;
- (12) An employee shall ensure that an entry of registrable interests

under subsection (7) is updated and to notify the Agency of any changes in the registrable interests, within one month of each change occurring.

15. PARTICIPATION IN TENDERS ISSUED BY THE AGENCY

- (1) An employee shall not participate in a tender for the supply goods or services to the Agency.
- (2) Notwithstanding subsection (1), a company or entity associated with the employee shall not be construed as trading with the Agency unless:-
 - (a) The employee has a controlling shareholding in the company or entity; or,
 - (b) The employee is a Director of the Company.

16. COLLECTION AND HARAMBEES

- (1)A KenTrade employee shall not use his office or place of work as a venue for soliciting or collecting harambees; or
- (2) Either as a collector or promoter of a public collection, obtain money or other property from a person by using his official position in any way to exert pressure.

17. DECLARATION OF INCOME, ASSETS AND LIABILITIES

- (1) Every KenTrade employee shall, once every two years, declare his income, assets and liabilities and that of the spouse and his dependent children under the age of 18 years as prescribed in section 27 of the Public Officer Ethics Act 2003. The same shall be submitted to the responsible Commission in December of every second year and shall be in the form set out in the Schedule and shall include the information required by the form.

- (2) All newly recruited employees of KenTrade shall within thirty days after engagement submit an initial declaration of income, assets and liabilities. The statement date of an initial declaration shall be the date employment.
- (3) Any employee resigning from the service of KenTrade shall submit a final declaration of income, assets and liabilities with the date being the date the officer ceased to be an employee of KenTrade.
- (4) Any employee who fails to submit a declaration or clarification or who submits, in such a declaration or clarification, information that he knows, or ought to know, is false or misleading, is guilty of an offence and is liable to disciplinary action as per the Agency's Disciplinary Policy and Human Resource Manual. The employee is also liable for conviction, to a fine not exceeding one million shillings or to imprisonment for a term not exceeding one year or to both.

18. BANK ACCOUNTS OUTSIDE KENYA

- (1) Subject to Article 76(2) of the Constitution or any other written law, an employee shall not open or continue to operate a bank account outside Kenya without the approval of the Ethics and Anti-Corruption Commission (EACC);
- (2) An employee who has reasonable grounds for opening or operating a bank account outside Kenya shall apply to the EACC for approval to open or operate a bank account;
- (3) An employee who operates or controls the operation of a bank account outside Kenya shall submit statements of the account annually to the EACC and authorize the EACC to verify the statements and any other relevant information from the foreign financial institution in which the account is held;
- (4) Subject to subsections (1) and (2), a person who is appointed

as an employee of the Agency and has a bank account outside Kenya shall, upon such appointment, close the bank account within six months;

- (5) Subject to subsection (4), an employee may open or continue to operate a bank account outside Kenya as may be authorized by the EACC in writing.

19. ACTING FOR FOREIGNERS

- (1) An employee shall not be an agent of, or further the interests of a foreign government, organization or individual in a manner that may be detrimental to the security interests of Kenya, except when acting in the course of official duty.
- (2) For the purposes of this section —
 - (a) an individual is a foreigner if the individual is not a citizen of Kenya; and
 - (b) an organization is foreign if it is established outside Kenya or is owned or controlled by a foreign government, organization or individual.

20. CARE OF PROPERTY

- (1) An employee shall take all reasonable steps to ensure that public property in the officer's custody, possession or control is taken care of and is in good repair and condition;
- (2) An employee shall not use public property, funds or services that are acquired in the course of or as a result of the official duties, for activities that are not related to the official work of the employee;
- (3) An employee shall return to the Agency all the public property in their custody, possession or control at the end of the appointment term;

- (4) An employee who contravenes subsection (2) or (3) shall, in addition to any other penalties provided for under the Constitution, the Act or any other law, be personally liable for any loss or damage to the public property.

21. MISUSE OF OFFICIAL INFORMATION

- (1) An employee shall not directly or indirectly use or allow any person under the officer's authority to use any information obtained through or in connection with the office, which is not available in the public domain, for the furthering of any private interest, whether financial or otherwise.
- (2) An employee shall not violate the requirements of subsection (1), if the information is to be used for the purposes of —
 - (a) furthering the interests of the Act
 - (b) educational, research, literary, scientific or other purposes not prohibited by law.

22. POLITICAL NEUTRALITY

- (1) An employee, shall not, in the performance of his /her duties -
 - (a) act as an agent for, or further the interests of a political party or candidate in an election; or
 - (b) manifest support for or opposition to any political party or candidate in an election.
- (2) engage in any political activity that may compromise or be seen to compromise the political neutrality of the office subject to any laws relating to elections.

23. IMPARTIALITY

An employee shall, at all times, carry out the duties of the office with

impartiality and objectivity in accordance with Articles 10, 27, 73(2)(b) and 232 of the Constitution and shall not practice favoritism, nepotism, tribalism, cronyism, religious bias or engage in corrupt or unethical practices.

24. GIVING OF ADVICE

An employee who has a duty to give advice shall give honest, accurate and impartial advice without fear or favour.

25. GAINFUL EMPLOYMENT

- (1) Subject to subsection (2), a full time employee shall not participate in any other gainful employment.
- (2) In this section, "gainful employment" means work that a person can pursue and perform for money or other form of compensation or remuneration which is inherently incompatible with the responsibilities of the Public office or which results in the impairment of the judgement of the Employees in the execution of the functions of the State office or results in a conflict of interest.

26. OFFERS OF FUTURE EMPLOYMENT

- (1) An employee shall not allow himself or herself to be influenced in the performance of their duties by plans or expectations for or offers of future employment or benefits;
- (2) An employee shall disclose, in writing, to the Agency, all offers of future employment or benefits that could place the employee in a situation of conflict of interest.

27. FORMER EMPLOYEES OF

A former employee shall not be engaged by or act for a person or entity

in a matter in which the employee was originally engaged in as a employee, for at least two years after leaving the Agency.

28. MISLEADING THE PUBLIC

An employee shall not knowingly give false or misleading information to any person.

29. FALSIFICATION OF RECORDS

An employee shall not falsify any records or misrepresent information to the public.

30. CONDUCT OF PRIVATE AFFAIRS

An employee shall conduct their private affairs in a manner that maintains public confidence in the integrity of the office.

31. BULLYING

- (1) An employee shall not bully another employee, a member of staff or any other person;
- (2) For purposes of subsection (1), "bullying" includes repeated offensive behavior which is vindictive, cruel, malicious or humiliating and is intended to undermine a person.

32. ACTING THROUGH OTHERS

- (1) An employee shall not —
 - (a) Cause anything to be done through another person that would constitute a contravention of this Code, the Constitution or any other law if done by the employee;
or
 - (b) Allow or direct a person under their supervision or control to do anything that is in contravention of this Code, the

Constitution or any other law.

- (2) Subsection (1) (b) shall not apply where anything is done without the employee's knowledge or consent or if the employee has taken reasonable steps to prevent it.
- (3) An employee who acts under an unlawful direction shall be responsible for his or her actions.

33. REPORTING IMPROPER ORDERS

- (1) If an employee considers that anything required of them is in contravention of the Code or is otherwise improper or unethical, the employee shall report the matter to the Commission as per laid down procedures;
- (2) The Commission shall investigate the report and take appropriate action within ninety days of receiving the report.

34. CONFIDENTIALITY

An employee shall not disclose or cause to be disclosed any information in his/her custody to any unauthorized person.

35. DUTY TO PREVENT OCCURRENCE OF CORRUPTION OR UNETHICAL PRACTICE IN THE AGENCY

An employee who believes or has reason to believe that a corrupt act or unethical malpractice has occurred or is about to occur in the Agency shall take all necessary measures to prevent it from continuing or materializing in addition to any other appropriate action.

36. PROMOTION OF ETHICS, INTEGRITY AND BEST PRACTICES IN THE AGENCY

Employees shall collectively and individually take measures to ensure that staff of the Agency uphold and practice the highest attainable degree of integrity in the performance of their duties.

37. DRESS CODE

An employee shall maintain appropriate standard of dress and personal hygiene at all times.

38. IMPLEMENTATION OF THE CODE

The Agency shall be responsible for ensuring full implementation of this code.

39. BREACH OF CODE

- 1) Breach of this Code or a section thereof amounts to gross misconduct for which the employee shall be subjected to disciplinary proceedings including disengagement from the services of the Agency;
- 2) Where a breach of this Code amounts to a violation of the Agency's Policies and Procedures, the employee will be subjected to disciplinary action in accordance with the KenTrade Disciplinary Policy & Procedures;
- 3) Any person may lodge a complaint alleging a breach of this Code by an employee;
- 4) A person alleging a breach of this Code may submit a formal complaint to the Agency through the Chief Executive Officer setting out the alleged violation as per laid down procedures.

40. REVIEW

The Code shall be reviewed at such intervals as the Agency may determine.



Amos S. Wangora
Chief Executive Officer

APPENDIX 1: REGISTRABLE INTERESTS

The following are the registrable interest as per Schedule 2 of the Leadership and Integrity Act 2012.

1. Directorships in public or private companies, whether or not remunerated directly or indirectly.
2. Remunerated employment (including office, trade, profession or vocation which is remunerated or which the Employees has any pecuniary interest).
3. Securities (shares, bonds, debentures or any other similar holding) in a company or enterprise or undertaking the aggregate nominal or market value of which exceeds a prescribed value while the Employees was in office.
4. Contracts for supply of goods and services.
5. Plans or expectations for or offers of future employment.
6. Public affairs advice and services to clients.
7. Shareholdings (amounting or not amounting to a controlling interest).
8. Land and property.
9. Sponsorship (from companies, trade unions, professional bodies, charities, universities or other organizations or individuals).
10. Travel facilities and overseas visits (made by an Employees or the Employee's spouse or child substantially catered for by the office of the Employees).
11. Gifts, benefits and hospitality (to an Employees or the Employee's spouse or partner or child or any other material benefit of a prescribed value, from a company, organization or person within

Kenya or overseas, which relates substantially to the Employee's employment with the Agency).

12. Miscellaneous financial interests (not falling within the above categories but which a reasonable member of the public would think might influence the conduct of an employee in his office).
13. Non-financial interests (which may reasonably be thought to affect the way a member discharges the duties in the Agency (such as unremunerated directorships; membership of public bodies such as hospital trusts, governing bodies of universities, colleges or schools, and other spheres of government; trusteeships, etc.).
14. Pending civil and criminal cases touching on the Employees or business associate or firm.
15. Possession of dual citizenship or pending applications for dual citizenship and the status of such application.

APPENDIX 2: STAFF DECLARATION OF CONFLICT OF INTEREST



KENYA TRADE NETWORK AGENCY (KENTRADE) (KTNA/HR&A/F/19)

DECLARATION OF CONFLICT OF INTEREST BY KENTRADE EMPLOYEES

Name of employee.....

Position..... Employee No.....

Person or Organization with Interest.....

Description of the Conflict of Interest.....
.....
.....
.....

I, the undersigned, holding the position of.....
at..... ID No..... being aware of the provisions of 46 (1) (d) and 46 (2) of the Leadership and Integrity Act, 2012 declare the above information to be true to the best of my knowledge.

Signature of employee..... Date

Submitted to.....

Designation of the officer submitted to.....

Signature Date.....

APPENDIX 3: GIFT DECLARATION FORM



Your G2B trading partner

KENYA TRADE NETWORK AGENCY (KENTRADE) (KTNA/HR&A/F/20)

GIFT DECLARATION FORM

PART I

Recipient's Name.....

Recipient's Designation.....

National ID/Passport No.....

Name of donor/donating institution.....

Name and Title of presenter.....

Description of the gift.....

Estimated value of the gift.....

Current location of the gift.....

Date of receipt/issuance of the gift.....

Date of declaration of the gift.....

Function at which the gift was received/issued.....

Signature of declarant.....

PART II – Recommendation of the processing officer

Retain/Surrender (strike appropriate)

.....
.....

Remarks of the Authorizing Officer

.....
.....

APPENDIX 4: COMMITMENT TO CODE OF CONDUCT AND ETHICS



KENYA TRADE NETWORK AGENCY (KENTRADE) (KTNA/HR&A/F/21)

COMMITMENT TO CODE OF CONDUCT AND ETHICS FOR KENTRADE EMPLOYEES

I, Holder of National ID/ Passport No..... and Post Office Box No..... having been appointed as of Kenya Trade Network Agency (KenTrade) do hereby confirm that I have read and understood this Code of Conduct and Ethics for KenTrade Employees and hereby commit to abide by the provisions of the Code at all times.

Sworn at

By the said

.....
Deponent

This day of20.....}

Before Me

Commissioner for Oaths/ Judge/ Magistrate