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WELCOME & INTRODUCTION TO CETraC EMPLOYEE HANDBOOK

This handbook is intended to help you get acquainted with Center for Excellent Training & Consultancy (CETraC). It explains CETraC philosophies, beliefs, and, in general terms, our employment guidelines. We hope that it will serve as a useful reference document throughout your employment with CETraC. Also, please understand that the handbook is not intended to be a contract (express or implied), nor is it intended to otherwise create any legally enforceable employment contracts or other obligations on the part of CETraC or to change the nature of any employment relationship. This handbook supersedes and controls over all previous policies adopted by the labour office and/or Executive Director & Management Team regarding the same subject matter to the extent those previous policies conflict with the provisions of this handbook.

CETraC Executive Director & Management Team is responsible for establishing procedures to administer these policies and for recommending to the Utility Board or its committees, any changes deemed desirable. CETraC reserves the right to make changes to the policies, procedures, and other statements made in this Employee Handbook consistent with Federal, State, and local laws. Business conditions, Federal and State Law, and organizational needs are constantly in flux and may require that portions of the handbook be re-written. This is necessary to successfully provide the appropriate employment relationship and to attain the goals of CETraC. When any part of this handbook is amended, CETraC will endeavor to communicate the change to all employees in a timely manner. Each CETraC employee is responsible for knowing and complying with all provisions contained herein.

The Executive Director & Management Team has the authority to make changes to this Employee Handbook, to the extent necessary to conform the provisions hereof with changes in CETraC organizational structure, within his or her authority, including, but not limited to, changes in job titles, levels of management, staff reorganization, and the like.

Please sign the acknowledgement form at the back of this handbook and return it to the Human Resources (HR) & Development Office. This will provide CETraC with a record that you have received the handbook.

VISION STATEMENT

To become a world-class accessible organizational development center across the globe in a multi-cultural environment.

To empower organizations through their human capital, by providing highly impactful quality training and consulting solutions customized to their need to help them achieve excellence in their business.

Enrich our customers' lives by providing energy services in a safe, reliable, affordable, sustainable manner while exploring new avenues to benefit our community.

MISSION STATEMENT

With the above vision, our mission is to provide relevant and organizational development to our clients at affordable price in today's competitive business environment. To assist our clients with talent management strategies which will optimize the performance of their people to achieve success individually and for their organization.

HISTORY OF CETraC SERVICES

CETraC means Center for Excellent Training & Consultancy. Center for Excellent Training & Consultancy is a global training and consulting center, comprising of more than 40 consultants. Our clients reflect our global nature. Around 40% are in West Africa, 20% in the East Africa, 20% in North and 20% in South Africa. We serve a broad mix of private, public-private, and social-sector organizations.

CETraC is designed to operate as one, single global partnership united by a strong set of values, focused on client impact. CETraC take a consistent approach to recruiting and developing our people, regardless of where they are based. This structure ensures that we can quickly deliver the right team, with the right experience and expertise, to every client, anywhere in the world. Center for Excellent Training & Consultancy (CETraC) is defined as the quality of our people is the cornerstone of our ability to serve our clients. For this reason, we invest tremendous resources in identifying exceptional people, developing their skills, and creating an environment that fosters their growth as leaders.

Meet a selection of our people and learn about their backgrounds. Our consultants include professionals who have attained distinctive positions like managing directors, vice president HR, engineers, project managers, HSE Heads, Head of Finance, entrepreneurs and the likes. They join CETraC for the opportunity to apply their talent in excellent training & consultancy to complex, important challenges. Their diversity of background, discipline, gender, nationality, and outlook ensures our clients receive a singular balance of deep and broad expertise.

Our work is founded on a rigorous understanding of every client's institutional context, sector dynamics, and macroeconomic environment. For this reason, we invest heavily on our firm's resources annually in knowledge development. We study markets, trends, and emerging best practices, in every industry and region, locally and globally. All consultants contribute time and expertise to developing these insights, because they are integral to our ability to help clients achieve their goals.

The ability to design and develop, organize and implement and assist the human capital to apply knowledge and skills at workplace has become requisite in every industry and function. To help our clients move quickly from design to delivery to actionable outcomes, we embed our proprietary knowledge in a growing collection of digital tools, analytics, and services, which allows managers at all levels to independently exploit our resources to make better decisions on a daily basis.

CETraC CORE VALUES

In next years, CETraC will continue to offer quality training and capacity building, human resource support, e-learning, and advisory consulting service support to organization across the globe that wish to strengthen their capacities in the thematic area for development. CETraC will continue to ensure that its technical support aligns with the organizational normative frameworks, vision and strategies on quality training and capacity building, human resource support, e-learning, advisory consulting service support as per the continental strategy for global organizational development, as well as the Sustainable Development Goals (SDGs). Some of the challenges we aim to tackle include training and capacity building, human resource support, e-learning, and advisory consulting service. CETraC's vision for the next five years further aims to ensure continued close coordination and cooperation with global organization aim for development.

Prominence: Entrhralling the hearts of others through distinction

- **Prominent People:** Have the strength of a warrior, who is a match for thousands. Work like a president, party like a king, learn like a child.
- **Prominent Service:** Create an impact through CETraC original training techniques by "designing the best human and organizational development solutions"
- **Prominent Company:** Even a small organization can be important! Winning without fighting is the greatest tactics. We aim to be the role model of other organizations around world, so that they say "We want to be like CETraC!"

Professional: Doing what you love passionately to earn money is the greatest pleasure

- **Master:** Be first-class. It is said that it takes over ten thousand hours of focused effort to become a professional! Ningenryoku (human power)!
- **Give it your best:** Be earnest! Don't give up! Don't be lazy!
- **Win:** Self-efficacy & Self-esteem (social capital)

Proactivity: Showing initiative, moving forward and being ahead

- **Creating Enterprise:** Innovation! Swallow your pride and try new things! If you are 60% sure then move forward!
- **Creating Demand:** Have a wide perspective and make preparations to react to any situation. When deep in fall prepare for winter
- **Discovering client needs through CETraC Centre's!** It is important for us to help our clients to be aware of their needs!

Progress: Adapt and orient to evolve to the next stage. Unreasonable demands are the catalyst for growth!

- **Be competitive!** Competition creates progress!!
- **No growth without introspection!** Write down the things you notice and learn.

Profit: Enriching people! Enriching organizations! Enriching society!

- **Enriching individuals:** Be financially sound to be morally sound! (Our thinking is that a financially sound organization will have less incentive to commit misdeeds) Stand out! Become the trendsetter!
- **Enriching organizations as well:** Profit is the most important requirement. Work towards maximizing profit in any situation! BEP = 70%
- **Contribute to society through sustainable management:** One of our mottos is "Clean break from misdeeds, raise profits, lasting entity" to contribute to human development, growth, and education in the world! Increase social capital.

CETraC CORPORATE BELIEFS

Safety and Environment: Placing top priority on safety, accident prevention and environmental preservation in order to protect the safety and health of employees, customers and local communities and contribute to building a sustainable society

Ethics and Fairness: Acting with fairness, high ethical standards and a strong sense of responsibility while complying with laws, regulations and social norms to earn trust and meet social expectations

Customer-Focus: Providing solutions of high value to customers, and pursuing customer satisfaction and the world's highest level of quality

Innovation: Achieving continuous innovation in all corporate activities, and aiming for dynamic evolution and growth

Workplace Competency: Learning from one another and making self-driven efforts to leverage technologies and expertise in order to strengthen workplace competency, which is the foundation of our corporate activities

Cooperation and Co-creation: Forming integrated internal linkages and strategic alliances with external partners, and evolving together with society by creating new value

Emphasis on Human Resources: Providing motivating work environments where employees can demonstrate their abilities, and building a vibrant corporate culture

Information Disclosure: Appropriately disclosing corporate information and enhancing communication with stakeholders in order to maintain management transparency

Respect for Human Rights: Fulfilling our responsibility to respect human rights as a good corporate citizen

CETraC PHILOSOPHY

"CETraC Philosophy" forms our corporate structure and underlying guiding principle. This philosophy, which have been well received by our clients, have guided our company throughout the years and are reflected in CETraC employees' daily decision making and actions.

Central Values: Our organization is a sound organization. We take great importance in the sustainability, uniqueness, and reputation in all areas of our business. Our purpose is to legitimately raise profits and have longevity without doing evil. (and other 8 sections)

Communication Organizational Culture: There are many different levels of communication such as the logical level, emotional level, and the behavioural level. When you think about every level the sender equals the receiver and the receiver equals the sender. Problems with communication can't be blamed only on the sender or the receiver. (and other 9 sections)

Structure (System, Design): Organizations are a means of doing work quickly and successfully (Form follows Function). Create an organizational structure that functions easily in an environment of constant change. If the current structure ceases to function well in the current environment and leads to inconsistency then find a clear solution and quickly change to a structure that functions well. In present times change is the norm. (and other 8 sections)

Human Resources: Employees of the BCon Group are capital, not a cost. They are members of an organization where employees should develop their knowledge, emotions, abilities, and economic power continuously. (and other 8 sections)

Problem Solving and Decision Making: What doesn't change? What must not be changed? What must be changed? Keep these three things in mind when solving organization problems. That doesn't mean that you should feel free to change everything. However, change needs are present in every organization. (and other 8 sections)

Management and Managers: In management excessive idealism and romanticism should be avoided. However, it's important not to limit the ideals of workers. At the same time, it is an important responsibility of management to enlighten employees that even greater ideals exist. (and other 8 sections).

CETraC HERITAGE

We plot our future by understanding our rich past. We have built this business around a willingness to boldly adapt and reinvent ourselves. The world has changed in remarkable ways over the last century. Along the way, we have changed in ways that are every bit as remarkable. From the outside, it would seem as though today's CETraC has little in common with our humble roots. Nothing could be farther from the truth. While today's company spans the globe and is a leader in several industries that seem to be a radical departure from where it all began, our history and the principles established long ago explain who we are today and why we are still here nearly years later.

CETraC has always been bold, we have fearlessly pursued opportunities and adapted more quickly than the world around us. Throughout it all, we have succeeded. We will never stray from our commitment to serving our customers, creating career opportunities for our employees around the globe, improving the global community that we operate in and providing shareholder value. We honour our heritage by staying true to who we are. It means serving our customers with a commitment to quality, value, and service that has stood the test of time. It means moving forward without ever forgetting where we came from.

THREE FOUNDATION PRINCIPLES

Autonomy: Accountable, self-directed employees that can responsibly think, act and solve problems based on corporate philosophy.

Emergence: A culture of innovation that enables the organization to respond rapidly and appropriately to change

Collaboration: Effective and seamless cooperation that generate positive and synergistic results.

CETraC FIVE CAPITALS (TANGIBLE & INTANGIBLE)

"CETraC Philosophy" forms our corporate structure and underlying guiding principle. This philosophy, which have been well received by our clients, have guided our company throughout the years and are reflected in CETraC employees' daily decision making and actions. The five (5) capitals are sourced from three foundation principles

Financial Capital: Financial Capital is about balanced fiscal statements, maximized profits and cash, as well as sound economic rationality

Technology Capital: Technological Capital is a major source of organization growth.

Intellectual Capital: Intellectual Capital is the wisdom and the knowledge of key leaders in the organization

Social Capital: Social Capital starts with and is developed from relationships of mutual trust between people

Ideological Capital: Ideological Capital starts with the aspirations, beliefs, organizing principles and philosophy of the organization

CETRAC TALENT DEVELOPMENT PLAN

Leadership Development: To stay successful companies must continuously invest in a strong pipeline of next-generation leaders who can help them build and secure a competitive advantage today's rapidly changing environment.

Sales/Marketing: Client needs increasingly diversify and change over time. In order to secure revenue streams under these circumstances, it is indispensable for organizations to establish a strong sales and marketing force to drive sustainable growth.

Performance Management: Performance Management is an approach for making sure that goals and targets are continuously being achieved in an efficient and effective manner.

Global Management: Globalization has become a requirement for many organizations to sustain growth. In this complex and dynamic environment developing talent capable of executing business strategies on a local level and managing intercultural difference becomes imperative.

Retention Improvement: High employee turnover costs continue to be challenge for many organizations worldwide. Studies suggests that more than 10 billion dollars are lost annually due to poor retention.

Career Development: Managing individual learning and career objectives within the organization is an important factor in workforce planning, talent management and performance improvement.

CETraC FUTURE

The Spirit of Turtle: In Japan, the turtle is a symbol of longevity. Although it is small, it is also lean and thrifty, helping it live well and long. The tale of the turtle and the hare tells us that the turtle wins the race against a faster opponent by moving continuously at a steady pace. For us, the turtle symbolizes our value of continuous and steady growth, continual growth that enables us to live long (and well) regardless of organization size.

Turtle Concept: Also taking from the turtle concept, we have adopted a lean organizational structure that allows employees make timely decisions, then take prompt actions to solve problems as they occur in the day-to day operations of business, while constantly improving productivity.

Organizations & Excellence on Global Stage: The turtle shell symbolizes our goal to support the development of organizations and human resources in order to enhance the global society. Our chief (company mission) aim is to design the best solutions for human and organizational development worldwide, while creating highly competitive and resilient organizations with exceptional talent, where people truly feel "the joy of purposefulness at work" and "the happiness of fulfilled living".

CORE STRENGTH

Design: We design with an extraordinary focus on detail. Every design is intended to delight, engage, and create lasting connections between brands and their customers.

Innovation: Ideas are the currency of innovation. We cultivate an environment where ideas are encouraged and thoughts flow easily. A passion for solving customer challenges drives our unquenchable thirst for innovation.

Technology: We use best-in-class technology and create cutting-edge applications to amplify the impact of our great products and services. Our focus on long-term growth drives us to invest in the very best technological solutions in every aspect of our business.

Logistics: We get your services where they need to be quickly and accurately. We have distribution centers across the country – some running state-of-the-art robotic systems and operating in real time with our order management systems. This allows us to provide same-day to a large percentage of our customers.

Feasibility Stability: With over years in business, we have the financial strength and stability to operate proactively across the globe. Building for the long-term, we consistently invest in new technologies, research, and development, and we routinely make strategic acquisitions that enhance and expand our capabilities.

Global Source: We have a distinct, global footprint with hundreds of overseas employees working hand-in-hand with our clients. We have spent years investing in deep relationships with those clients, ensuring quality and reliability that are second to none. We leverage redundancy, operational flexibility, and a multitude of sourcing channels to provide an unmatched combination of speed, value, quality, and reliability.

Quality: We have built our brand on an uncompromising commitment to quality and safety. Our Quality Control and Testing teams take a hands-on approach to product integrity, traveling the world to ensure that every product we make meets our exacting quality and testing standards. Our commitment to product quality is so integral that we built our own quality assurance lab in our corporate headquarters. The lab provides us with a testing platform for raw materials, components, and finished goods.

ETHICAL PRINCIPLES

Integrity is the value that describes the essence of our professional conduct.

Honesty is the foundation for the execution of our business practices.

Good Faith is what strengthens our co-workers and clients' trust.

"Whenever you do a thing, act as if all the world were watching." -Thomas Jefferson

ETHICAL CULTURE

Code of Ethics

CETraC, Inc. and its subsidiaries (collectively "CETraC" or the "Company") are committed to always acting with integrity, honesty and good faith in all areas. These principles define our corporate culture and are the basis of every activity in which we are involved.

This Code of Ethics for Vendors and Service Providers (the "Code") defines and reaffirms these high standards. Each vendor and service provider (collectively, the "Service Providers") is expected to adhere to the ethical principles and procedures set forth in this Code, and ensure that their employees, subcontractors and agents also comply with its provisions.

If there is ambiguity in any provision of any policy, practice or rule established by CETraC, the Company reserves the right to interpret them at its sole discretion. This Code of Ethics for Vendors and Service Providers establishes the general rules of ethics and compliance to be followed by vendors and service providers when they perform their work, including: (1) protecting tangible and intangible assets; (2) avoiding real and potential conflicts of interest; (3) treating competitors fairly; (4) handling confidential information and intellectual property rights appropriately; (5) complying with all applicable laws, rules, and regulations; and (6) reporting unethical behavior.

One of the objectives of this Code of Ethics is to provide guiding principles to help prevent, detect and understand what constitutes ethical, unethical, illegal or inappropriate behavior. When questions or concerns arise, please seek guidance and advice from CETraC's Legal & Compliance Division, the Human Resources Division or the Compliance and Ethics Officer.

If your questions or concerns are related to any audit, finance or accounting issues, you can also seek guidance from our Chief Financial Officer, Internal Audit Director or the Audit Committee. You may also report concerns or violations anonymously through our confidential Ethics Line at <http://www.cetracgh.org>. It is your responsibility to adhere to the standards and requirements imposed on CETraC. Thus, a violation of a law, rule, regulation or policy could also constitute a violation of this Code. Depending on the country, this Code may be supplemented or replaced by the laws or regulations of the jurisdiction in which any of our employees, officers, or directors are doing business at.

This Code is part of CETraC's compliance program and constitutes an important tool of its internal control structure.

Compliance with the Code

CETraC appreciates all the efforts performed by its Service Providers to maintain the highest ethical standards in their business interactions. By upholding these standards, they help enable CETraC to do the same, while also contributing significantly to our success. This Code helps

Service Providers fully understand CETraC's commitment to complying with all laws, rules and regulations applicable to the engaged service.

For the purpose of this Code, Service Provider refers to an organization, independent contractor, individual or other non-affiliated entity engaged by CETraC to provide goods and/or services to CETraC or its clients. The definition is inclusive of domestic or international business partners, merchant acquiring, payment processing and business process management services providers; sales agents, sales agencies, delegates, vendors, suppliers, contractors, consultants and related entities acting on behalf of CETraC, either directly or indirectly. It excludes wholly owned subsidiaries of CETraC and their employees.

A violation to this Code, which includes a failure to report potential violations by others, will be regarded as a serious offense and may result in termination of the business relationship with CETraC. If you believe in good faith that a violation of this Code has occurred, please contact the Director of the Legal and Compliance Division or the Compliance Director and Ethics Officer, or report the violation using our confidential CETraC Ethics Line www.CETraCEthicsline.com. Your understanding of this commitment and willingness to raise ethical concerns are essential to the well-being of CETraC's clients, as well as the success of both you and CETraC.

Ethical Business Decisions

Service Providers have the responsibility to serve CETraC, its directors, officers, employees and clients while employing the highest standards of compliance and ethics. The following are general guidelines that will help you in complying with your responsibility:

- Always avoid any conflict of interest or even the impression of a possible conflict of interest.
- Always comply with applicable laws, rules and regulations
- Act in good faith, responsibly, with due care, competence and diligence in your business transactions with CETraC.
- Protect the confidentiality and prevent the unauthorized disclosure of non-public information (whether material or not) about CETraC, its customers, suppliers and other third parties.
- Protect the tangible and intangible assets of CETraC at all times and use them only for legitimate business purposes.
- Never use or attempt to use your relationship with CETraC to obtain improper personal benefits.

- Report any conduct believed to be ethically questionable, a conflict of interest or a violation of law, including transactions or relationships that could reasonably be expected to give rise to such a violation.

Consider the effect of your actions and ask for guidance. If you are uncertain about a course of conduct, ask yourself:

- It is legal?
- It is ethical?
- It is consistent with the Code?
- Will it have a positive impact on the Company?

If the answer to any of these questions is NO, you should not do it.

Conflicts of Interest

You must avoid conflicts of interest or the appearance of a conflict of interest. A conflict of interest arises when a Service Provider's private or personal interests

- i. influence or appear to influence the objective exercise of the Service Provider's duties;
- ii. affects or appears to affect the Service Provider's impartiality;
- iii. interfere or appear to interfere with CETraC's interests or is otherwise inconsistent with the interests of CETraC.

Conflicts of interest are prohibited as a matter of corporate policy. You should never use or attempt to use your status as an CETraC Service Provider to obtain any improper personal benefit for yourself or any other person or entity. Business decisions and actions must be based wholly on the best interests of CETraC and must not be motivated by personal considerations or relationships.

Conflicts of interest are present in personal or business relationships that could lead to, but are not limited to: (1) bribes, kickbacks, (2) improper use of information, or (3) competing with any of CETraC's lines of business. Because it is impossible to describe every potential conflict, CETraC must rely on your commitment to exercise sound judgment. Should you become aware of a conflict of interest or if you are concerned that a conflict might develop, you must promptly refer the matter to CETraC's Compliance Director and Ethics Officer.

Furthermore, please inform us before entering into a business transaction with CETraC if:

- You have a family member working at CETraC or its affiliates.
- You, or anyone in your household, is either a relative of, or in a close relationship with, a member of CETraC's Board of Directors or an executive officer.
- You or anyone in your household, owns or has a direct or indirect interest in a company, subcontractor or agent that provides a service to CETraC or its affiliates.

Service Providers are required to disclose to the Compliance Director and Ethics Officer any relationship that could reasonably be expected to give rise to a conflict of interest or the appearance of such a conflict. The following are examples of the most common areas in which real or perceived conflicts of interest may arise:

Gifts and Other Things of Value: A gift is anything of value that you give or receive without having to make a payment, or at a discount that is greater than the one available to a similarly positioned person. With certain limited exceptions, such as nominal gifts, promotional items or courtesies that are unsolicited, lawful and infrequent, Service Providers should never offer or provide, directly or indirectly, gifts, services, loans or other things of value including, but not limited to, cash, money, bribes and kickbacks, to an CETraC's director, officer, employee, supplier, business partner or customer.

Such prohibition includes, but is not limited to, a Service Provider offering or providing a consulting, employment or similar position to an CETraC's employee, or the employee's family member or significant other. Service Providers may not provide or allow their close family members to provide to CETraC's employees, customers, suppliers or others anything of value in exchange for past, current or future business relationships with CETraC.

If the Service Providers are unsure whether a particular gift or service is permissible, they must contact CETraC's Compliance and Ethics Officer or the confidential Ethics Line at www.cetracgh.org. Furthermore, accepting gifts, favours, travel and entertainment may create a conflict of interest with the Service Provider's obligations to CETraC, as well as constitute a violation of law.

Corporate Opportunities: While acting as an CETraC Service Provider, you may have access to information, products, trade secrets, among others, that may represent a corporate or business opportunity. In those circumstances, prior to the use of CETraC's property, information, services, etc., you must obtain the approval of CETraC's Compliance Director and Ethics Officer. Furthermore, you must comply with the following obligations, responsibilities and prohibitions regarding corporate opportunities:

- Advance CETraC's business interests when the opportunity to do so arises.
- Refrain from taking or directing to a third party a business opportunity discovered through the use of CETraC's property, information or relationship.
- Abstain from using CETraC's property or information or your position as Service Provider to compete with CETraC for personal gain

Speak Up on Ethical and Compliance Issues: If at any time you observe or become aware of a behaviour that concerns you, or that you suspect may represent a violation of this Code, you must report the issue promptly, even if you're not sure if it is unethical. It is your obligation to promptly report suspected or actual violations of this Code, the law, or other violations related to your business with CETraC.

By speaking up when ethical and compliance issues arise, you provide CETraC an opportunity to address the situation and correct it, ideally before a violation of the law, or a risk to the health or security of others occur. Questions concerning the best course of action in a particular situation, as well as all reports of a suspected or actual violation of a law, regulation or ethical standard must be immediately addressed to our Compliance and Ethics Officer.

If you wish to remain anonymous, you can report a concern in a confidential and anonymous manner through CETraC's Ethics Line at www.cetracgh.org at any time and from any computer, whether corporate or personal. Failure to report any such violation, or potential violation by others, is in itself a violation of this Code. We encourage ethical behaviour and honesty. CETraC has a strict no-retaliation policy for those reports of legal or ethical violations, which are made in good faith.

Corrective Measures: A violation of this Code, including the failure to report potential violations by others, could compromise CETraC's integrity and reputation, causing CETraC to be subject to criminal, civil and monetary penalties. CETraC will investigate any complaints received against its Service Providers, their performance, work and/or behaviour inside or outside of our premises. If CETraC determines that a Service Provider, or any of its employees or representatives, breached any disposition of this Code, CETraC will take corrective measures, which may include requiring the removal of any employee of the Service Provider from servicing CETraC, and termination of the Service Provider's contract among other legal measures that may be available to CETraC. Service Providers are expected to fully cooperate with governmental authorities in investigations regarding breaches of this Code, and to follow contractual dispositions with CETraC as applicable.

INVESTOR RELATIONS

Accurate Business Records and Reports Accurate reporting and analysis are very important for CETraC's businesses and operations. The records, data and information that CETraC owns, collects, uses and manages must be precise and complete. Service Providers are responsible for the integrity of those records or documents under their control. CETraC expects that financial reports be accurate and reliable in compliance with financial rules and generally accepted accounting principles. When creating business records and other documents (including e-mails) that may be retained by CETraC, or a third party, Service Providers must observe the highest business standards regarding content and language, taking into account that in the future CETraC, or a third party, may have to rely on or interpret such records or documents.

Information to Financial Analysts

Service Providers are prohibited from providing CETraC's confidential and proprietary information to financial analysts outside of CETraC. As a public company CETraC has designated persons to speak in the name of the Company. The Service Provider must refer the financial analyst to a designated CETraC's spokesperson. The Programmes Director, the Operations Manager, the

Training & Capacity Building Manager, Human Resource Manager, and Financial Controller of Investor Relations are the CETraC officials who have been authorized to speak on behalf of CETraC.

Media, Publishing and Public Appearances

CETraC's ability to maintain a good reputation and image in the community is of utmost importance to its success as a business. To ensure that CETraC's reputation and image remain uncompromised, all inquiries to Service Providers that relate to CETraC, including CETraC's relationship with the Service Provider, must be referred to CETraC's Communications Division.

Service Providers should not make public appearances or statements on behalf of CETraC, or publish any material that relates to CETraC, without securing prior written approval from the Communications Division. Only officially designated CETraC's spokespersons may provide comments to the media or materials for publication.

Before publishing any material in physical or electronic format, making speeches, giving interviews, or making appearances or responding to media inquiries related to CETraC, its operations, clients or employees in your capacity as CETraC's Service Provider, you must first notify and obtain written approval from the Legal and Compliance Division and the Communications Division. Written or electronic format or media inquiries may include any form of social media or internet forum such as:

- internet
- multi-media and social networking sites
- blogs
- microblogs
- podcasts
- forums
- content communities
- wikis.

When using social media, Service Providers must comply with this Code of Ethics, (including the confidentiality, non-disparagement and conflicts of interest provision contained herein), guidelines, and applicable laws and regulations. These include, but are not limited to, copyright, confidentiality, privacy, fair use and financial disclosure laws. For security reasons CETraC's Service Providers may not publish pictures of areas within CETraC's facilities.

Insider Trading

The use of material information not publicly available (Insider trading) occurs when individuals with access to material non-public information about a public company buy or sell that company's stock or other securities, based on that information or "tip" other people on such material non-public information. This conduct is not ethical, precisely because of the use of material non-public

information, which makes it unfair to other investors who don't have access to it. Federal and state securities laws prohibit insider trading, or the purchase, sale, recommendation (a "tip") or transfer of securities on the basis of material non-public information.

Service Providers may acquire, while providing their services, information that is sensitive and confidential. Such information is CETraC's property and Service Providers are prohibited from using this information, directly or indirectly, for trading in CETraC's securities. The use of information of other CETraC 's clients or suppliers for the purpose of trading their securities is also prohibited.

This applies not only to you as our Service Provider but also to your family, friends or others who might be in a position to make investment decisions based on non-public, material information. Material information is any information that could substantially impact an investor's decision to buy or sell the security. Non-public information is information that is not legally available to the public.

It is important that you are aware of the consequences of engaging in insider trading, regardless of your relationship with CETraC, or whether or not the transaction results in a profit. This last point is of particular importance. You may violate insider trading laws irrespective of whether you, or someone you "tip", ultimately makes a profit. The use of material non-public or inside information about other publicly traded companies is also prohibited. Any inappropriate use or disclosure of inside information may expose you, CETraC and any person to whom the inside information is communicated, to severe penalties, both criminal and civil, under applicable laws.

PROTECTION OF CETRAC'S ASSETS

Safeguarding and Using CETraC's Assets

As an CETraC Service Provider, you must protect CETraC's tangible and intangible assets, as well as the assets of CETraC's customers, suppliers, business partners and distributors that are under your control or acting on your behalf. CETraC's assets may only be used for legitimate business purposes. Misappropriation of CETraC's assets is a breach of duty towards CETraC and may constitute an act punishable by law. Careless or wasteful management of CETraC's assets is also considered a breach of your responsibilities as an CETraC Service Provider.

To be able to monitor compliance with our rules and standards concerning the security and protection of both, CETraC's and individual property, searches of property owned or controlled by CETraC may be conducted at any time, including property used and/or in possession of the Service Provider, its employees or representatives, while on CETraC's premises.

All messages stored in CETraC's servers or cloud, created, sent and/or received are property of CETraC. Thus, CETraC reserves its right to monitor, review, disclose, re-route or edit this information. CETraC's telephone, e-mail, voicemail or any other computer equipment or systems

are to be used for business purposes. Therefore, using them for personal benefit should be kept to a minimum. They should never be used in a way that could harm CETraC. Similarly, CETraC's physical facilities can only be used for business purposes.

Safeguarding CETraC's Intellectual Property Intellectual property includes ideas, formulas, original works of authorship, trade secrets, trademarks, service marks, patents, inventions, software, source code, methods, designs, and techniques, regardless if they are registered for protection under any patent, trademark or copyright laws. You must respect intellectual property rights at all times.

The unauthorized or illegal use of intellectual property may constitute an act punishable by law. Any violation or infringement of the rights of an intellectual property owner could expose CETraC or its Service Providers to litigation and monetary sanctions. Service Providers recognize that, absent any contractual provision(s) to the contrary, intellectual property made or developed during the service contract with CETraC shall be the property of and inure to the exclusive benefit of CETraC.

To assist CETraC in safeguarding its marks from misuse, Service Providers must obtain a written authorization from the Communications Division prior to any use of CETraC's marks. If authorized, the Service Provider must affix such mark with the appropriate trademark, service mark or symbol. If you have a question regarding the appropriate use of our intellectual property or suspect there has been a violation of intellectual property rights, please contact the Legal and Compliance Division.

Privacy and Security Obligations

While carrying out CETraC's business, you may often learn, or have access to, confidential or proprietary information about CETraC, its employees, customers, business partners and suppliers. Adequate handling of confidential information is one of our biggest responsibilities and is essential to the success of our business. The privacy of personal information is further protected by numerous laws, regulations and industry rules and standards. It is very important that you understand your obligations and the impact that privacy and security of confidential information have on your organization as well as on CETraC.

Your obligations will depend on the nature of the information that you have contact with while performing services on, or for, CETraC. You may be required to maintain effective physical, technical and administrative controls to ensure the privacy and security of CETraC's data handled by you. If the information is of highly confidential or sensitive nature, as an CETraC Service Provider, you may be subject to contractual obligations that will require you to have in place a written security program for your employees, and upstream and downstream entities, to identify and report a suspected privacy or security breach or violation.

Safeguarding and using such information appropriately is a priority for CETraC. You must take appropriate steps to safeguard confidential information in your possession, protecting it from unauthorized disclosure, misuse, loss or theft. Service Providers have a duty to use this information only for the purpose for which it was provided, unless further use is required by law, regulations, legal proceedings, or authorized by the owner of the information. It's your responsibility to exercise due care to protect, at all times, any confidential and proprietary information you obtain in connection with your activities at CETraC. This responsibility will continue even after you have ceased your association with CETraC and includes information you developed during the performance of the contracted duties.

Service Providers should contact an independent legal counsel to determine all the required actions in order to be compliant with privacy and security laws, rules, and regulations. As a general rule, under the Security and Exchange Commission (SEC) Rules and Regulations, Business Laws of Ghana, as well as other privacy laws and regulations applicable to non-Ghanaian jurisdictions, Service Providers should have:

- privacy and security policies that protect the privacy, confidentiality and integrity of customer information,
- safeguards in place to ensure that information is protected and not inappropriately used or disclosed,
- required confidentiality agreements,
- a privacy and security breach process that includes reporting, investigating, and tracking of incidents,
- a procedure for the required return/destruction of protected customer or confidential information upon termination of the Service Provider's agreement with CETraC, and
- a procedure for restricting the marketing of protected customer information.

Service Providers with a signed service agreement or contract should review the provisions covering confidentiality and privacy obligations for additional information on the requirements that may apply, particularly those regarding the Service Provider's written information security program. If needed, CETraC may, at any time, request a copy of the aforementioned information security program to ensure its adequacy and submit a certification to validate Service Providers' compliance with privacy and security laws and regulations.

CETraC's Privacy Policy details CETraC's commitment to customers and the processes that define, document, monitor and manage the security of personal information. It is vital that CETraC, and its Service Providers, comply with all data privacy laws and regulations when handling, acquiring

or developing confidential information about CETraC's customers. Any fraudulent or improper use of this type of information by a Service Provider is strictly prohibited. Violations to the aforementioned will be considered justification for the termination of any relationship with CETraC.

Notification Requirements in the event of a Security Breach

In the event of an actual or suspected security breach involving unauthorized access that either compromises or could compromise personal or confidential information, including customer information, collectively a Security Breach (e.g., physical trespass on a secure facility, computing systems intrusion/hacking, loss/theft of a PC (laptop or desktop), loss/theft of printed documents, etc.), you must notify CETraC immediately.

Except as may be strictly required by applicable law, you agree that you will not inform any third party of any such security breach without CETraC's prior written consent. However, if such disclosure is required by applicable law, you agree to cooperate with CETraC regarding the content of such disclosure in order to minimize any potential adverse impact upon CETraC and its clients and customers.

The report should include:

- a) the information breached,
- b) individuals affected by the breach,
- c) steps being taken to investigate the breach,
- d) date of the breach and
- e) date of discovery of the breach.

You can send your report by email to info@cetracgh.org or through the CETraC contact section at www.cetracgh.org.

SERVICE PROVIDERS' RESPONSIBILITIES

Confidential and Proprietary Information

CETraC generates and has access to highly confidential information from businesses, clients, employees, business partners, officers and directors which must be safeguarded to prevent inappropriate disclosure and unwarranted invasion of the rights to privacy of our customers, human resources and contracted entities.

CETraC's confidential and proprietary information includes, among other things:

- internal business practices and records,
- network, electronic, and media software and hardware,
- intellectual property,
- information concerning clients, providers, products, and pricing,
- marketing and sales information,

- CETraC's customers and financial information, and
- information about CETraC's agreements and business relationships.

This information is considered confidential regardless of the media in which it exists (electronic or paper form) or how it is stored, accessed or transmitted (electronic, physical or oral). All confidential information belonging to CETraC must be retained in strictest confidence and not be disclosed to a third party, other than those employees or Service Providers having a "need to know", and such recipients must certify to maintain the confidentiality of the information.

Unauthorized disclosure of, or access to, confidential information may result in termination of a service contract and/or in civil and criminal penalties. Service Providers will be required to sign a non-disclosure and confidentiality agreement prior to the exchange of CETraC's confidential information, unless the Service Provider already has in place an agreement with CETraC that contains the appropriate provisions acceptable by CETraC regarding confidentiality obligations.

Fair Dealings

CETraC enjoys a history of success and an excellent reputation through honest competition and by not seeking competitive advantages through illegal or unethical business practices. CETraC's Service Providers must deal fairly with CETraC's customers, service providers, suppliers, business partners, competitors and employees, and may not take advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any unfair or illegal dealing practice.

Unless preferential treatment is available on similar terms, to similarly situated persons within the same business industry, and in similar positions, CETraC's directors, officers and employees should not receive preferential treatment from Service Providers.

Non-Solicitation

CETraC values its business relationships with its clients, vendors and Service Providers. To that end, you should be respectful of our business relationships when considering or soliciting others for employment, whether or not that person is a part-time, full-time, temporary or permanent employee, and whether or not such employment is pursuant to a written agreement, for a determined period, or at will. Specific dispositions regarding non-solicitation of employees are specified in the Service Provider agreement.

Non-Disparagement

During the contractual relationship between the Service Provider and CETraC, and at all times thereafter, neither the Service Provider nor their agents, executives or directors shall directly or indirectly issue or communicate any public statement, or statement likely to become public, that maligns, denigrates or disparages CETraC or its directors, executives, employees or clients.

The foregoing shall not be violated by truthful responses to:

- a) legal processes or governmental inquiries or
- b) by private statements to CETraC or any of CETraC's executives, directors or employees.

The Service Provider shall take into consideration the dispositions in the service agreement regarding disclosure of information, as applicable.

Acceptance of Clients and Suppliers

Service Providers may not accept other clients that may interfere or compromise their contractual responsibilities with CETraC's services. When dealing with other clients or suppliers, Service Providers must evaluate that the relation will not develop a conflict of interest, corrupt actions or misuse of information or resources while providing the services and using their employees.

LEGAL AND REGULATORY COMPLIANCE MATTERS

Laws, Regulations and Compliance Policies

Our goal is to maintain our standing as an ethical, safe, and strong organization so that we can protect our reputation, our employees, customers, shareholders and other stakeholders. Most of our clients are highly regulated and our business is also subject to numerous laws, regulations, rules and industry standards. Consequently, we need to know and comply with the laws, regulations and rules under which we operate.

This is critical to our business. Violating the law or engaging in unfair, deceptive or abusive acts or practices can result in the loss of customer or market confidence and reputation. It could also lead to the imposition of sanctions, civil and criminal fines and penalties, and other negative consequences. If you believe you are faced with a situation where complying with our Code would cause you to violate a local law, you should consult with our Legal and Compliance Division immediately.

Whistle Blowing

A whistle-blower is a person who voluntarily provides information to the general public, or someone in a position of authority, about dishonest or illegal business activities occurring at an organization. This organization could include a government department, a private organization, or a public company such as CETraC. CETraC has established procedures for confidential and anonymous submission, receipt, retention and treatment of complaints regarding accounting, internal accounting controls and any auditing matters, as well as suspicious, fraudulent or illegal acts, mismanagement of funds, compliance or ethics violations, and employee-related matters. If Service Providers have a complaint or concern regarding any of these matters, promptly follow the reporting methods established in this Code. CETraC prohibits all forms of retaliation on Service Providers who in good faith report or raise complaints regarding the abovementioned matters.

Anti-Money Laundering and Counterterrorism Financing Policy

CETraC is committed to assisting governments, international organizations and other members of the financial services industry in an effort to limit the channels used by money launderers,

terrorists and drug traffickers. Service Providers may not engage in money laundering or finance terrorist activities and, regarding the services provided to CETraC, they are expected to have their own programs to prevent and detect such activities and to shield CETraC from being used as a money laundering conduit. No business opportunity is worth compromising the commitment to combat money laundering.

If you detect unusual activities or have any concerns regarding money laundering or terrorist financing, you must immediately report them to CETraC's Legal and Compliance Division, the Compliance Director and Ethics Officer or through the confidential Ethics Line at www.CETraCethicsline.com. Service Providers are expected to follow all Anti-Money Laundering laws and regulations applicable to their businesses or the jurisdictions in which they do business. Failure to comply with this requirement may result in the termination of the relationship with CETraC, in civil and criminal penalties and/or in legal actions from CETraC against the Service Provider, as applicable.

Economic Sanctions

CETraC follows our Office of Foreign Assets Control ("OFAC") Policy and Operational Instructions as well as any related procedure in the jurisdictions in which CETraC does business. In complying with OFAC policy, we must not process commercial or financial transactions involving any OFAC sanctioned country, individual, commercial or government entity. Service Providers must follow OFAC laws and regulations, as applicable to the services provided to CETraC.

Failure to comply with OFAC requirements may result in the termination of the business relationship with CETraC and also in civil and criminal penalties. The Ghana government administers and enforces economic and trade sanctions based on Ghana foreign policy and national security goals against targeted foreign countries and regimes, terrorists, international narcotics traffickers, those engaged in activities related to the proliferation of weapons of mass destruction, and other threats to the national security, foreign policy or economy of the United States. CETraC is prohibited from engaging in certain business transactions or contracting with Service Providers involving embargoed countries and designated persons or entities.

Service Providers, as well as their owners, officers and representatives, are screened against the OFAC lists upon the initial engagement of the Service Provider by CETraC and every time the OFAC lists are updated. CETraC will

- i. refuse to engage in new commercial relationships,
- ii. reject transactions,
- iii. block assets or
- iv. terminate an existing business relationship, if the Service Provider, or any of its owners, directors, officers, employees, upstream or downstream entities, are, have been, or become designated as:
 - a. Specially Designated Nationals and Blocked Persons (SDNs),
 - b. Specially Designated Terrorists (SDTs),

- c. Specially Designated Narcotic Traffickers (SDNTs), and
- d. Specially Designated Global Terrorists (SDGTs), or
- e. are included in the OFAC Consolidated Lists.

Anti-Bribery and Anti-Corruption

As a Ghanaian company with international activities and investments, CETraC is required to comply with the Foreign Corrupt Practices Act (FCPA), CETraC's Anticorruption Policy, the UK Bribery Act, as well as with all the anti-bribery and anti-corruption laws applicable in the countries where CETraC does business.

The FCPA imposes certain obligations on companies that, like CETraC, are publicly-traded and therefore registered with the SEC. FCPA prohibits bribery or corrupt payments to a foreign official to obtain or retain business, whether such bribery or corrupt payment is made directly or indirectly.

In addition, the FCPA requires that publicly listed companies maintain records that fairly and accurately reflect the transactions of the Company as well as maintaining an adequate system of internal accounting controls that assure management's control over the Company's assets. CETraC is committed to complying with applicable anti-bribery and anti-corruption laws. We take this commitment very seriously and require the same level of commitment from our Service Providers.

The Ghana Bribery Act is another anti-corruption law, which prohibits bribery within the public and private sector. In the private sector it makes it illegal to offer or give anything of value, either directly or through an intermediary, to induce the recipient or some other person to violate his or her duty of loyalty to his or her employer, or to provide the recipient with an improper advantage in connection with his or her position. The Ghanaian Bribery Act also establishes that it is illegal to request anything of value in violation of a duty of loyalty to one's employer or to receive an improper advantage in connection with one's position.

In the public sector, it makes it illegal to bribe public officials. Bribery occurs when promising, offering, giving or authorizing the offering or giving of money, or anything of value, to a public official, either directly or through an intermediary, to secure an improper advantage. Anticorruption laws applicable to CETraC prohibit more than monetary payments, for they also forbid the acceptance, or giving, of anything of value to a public official or a close family member of the public official.

CETraC expects its Service Providers to comply with the FCPA, as well as with all the anti-bribery and anti-corruption laws applicable in the countries where CETraC and the Service Provider conduct business. There are instances when Service Providers will be expected to have policies and procedures in place to affirm the integrity of their organizations' information. If requested, Service Providers have an obligation to provide accurate and complete information to CETraC

about the status of financial, operational, and compliance risks and controls related to their business with CETraC.

Service Providers who believe they have been asked to withhold information from auditors should immediately report their concern at <http://www.cetracgh.org>. Service Providers are responsible for submitting truthful, complete and accurate data, and are required to appropriately document services in their reports. These expectations require from all Service Providers to warrant and represent to CETraC that neither they, nor any of its officers, directors, employees, agents or other representatives, have performed, or will perform, any of the following acts in connection with their business relationship with CETraC:

- pay, offer or promise to pay, or authorize the payment of, any money; give or promise to give, or authorize the giving of, any services or anything else of value, either directly or through a third party, to any official or employee of any governmental authority or instrumentality, or of a public international organization, or of any agency or subdivision thereof, or to any political party or official thereof or to any candidate for political office for the purpose of any of the following:
 - Influencing any act or decision of that person in his official capacity, including a decision to fail to perform his official functions with such governmental agency or instrumentality or such public international organization or such political party;
 - inducing such person to use his influence with such governmental agency or instrumentality or such public international organization or such political party to affect or influence any act or decision; or
 - securing any improper advantage.

The consequences of a Service Provider failing to comply with any of the previous acts regarding the FCPA, may include the following:

- a) the agreement between CETraC and the Service Provider shall become void;
- b) CETraC shall have a right of action against the Service Provider for the amount of any monetary payment or thing of value made or given by the Service Provider in breach of any of such covenants; and
- c) all obligations by CETraC to pay a fee, or other compensation, to the Service Provider shall cease immediately

The FCPA has specific criminal and civil penalties for violations involving what may be considered bribery of any of the aforementioned persons or entities. These penalties include, but are not limited to, fines for the Company and the Service Provider as well as fines and imprisonment for

individuals convicted of such conduct. Service Providers who intend to interact or conduct business transactions with foreign entities on CETraC's behalf must never do so without obtaining prior written authorization from CETraC's Legal and Compliance Division regarding the Anti-Bribery and Anti-Corruption Program requirements.

Export and Import Regulations

In performing the obligations under the contract with CETraC, Service Providers shall comply with the export control regulations and other applicable laws related to the export of goods, software, technology or technical data or services. In case of exports, Service Providers acknowledge that they have obtained all the authorizations required by the laws or regulations for selling and exporting their products, where applicable.

No exports or re-exports will be made without authorization to any country that is subject to an embargo or other trade sanctions by the U.S. Also, no exports or re-exports will take place with any person or organization on the various lists of restricted parties maintained by the Ghana Government, including the Entity List, Treasury Department Specially Designated Nationals and Blocked Persons List, Unverified List and the Denied Persons List, or any other list that the Ghana Department of the Treasury or Ghana Department of Commerce may identify from time to time.

Conflict Minerals

Service Providers that are required by the Dodd-Frank Wall Street Reform and Consumer Protection Act to conduct the necessary due diligence of the origin, source and chain of custody of conflict minerals in their products, must disclose to CETraC the country of origin and source of the conflict minerals used in the production of any product subject to their contract with CETraC. We expect that our Service Providers who manufacture components, parts, or products containing tin, tantalum, tungsten and/or gold, commit to acquiring those materials from sources that are in compliance with the conflict minerals rule.

Such Service Providers are expected to exercise due diligence, as established by law, to determine whether those materials are from the Democratic Republic of the Congo or adjoining countries and determine whether those materials finance or benefit armed groups or groups that are against human rights. Antitrust Laws State and Federal Antitrust laws prohibit monopolistic conduct and agreements that restrain trade. CETraC is committed to competition and consumer choice in the marketplace.

Trade practices that unfairly or unreasonably restrain competition in dealings with customers must also be avoided. Service Providers must adhere to the antitrust laws, including but not limited to the Sherman Act, the Clayton Act, the Federal Trade Commission Act, the Puerto Rico Antitrust Act and any foreign laws (if applicable to the business jurisdiction). Antitrust regulations establish that CETraC and CETraC's Service Providers must avoid any agreement or understanding with competitors on price, customers, markets, or other terms of dealing. For example, in order to avoid the impression that CETraC is fixing rates, antitrust laws prohibit any director, officer or

employee of CETraC to disclose to any Service Provider the amount CETraC pays to another Service Provider, nor any detail about the engagement with another Service Provider.

CETRAC'S ENVIRONMENT

Human Rights Policy

CETraC Limited. believes respecting human rights is fundamental in developing our operation. Our commitment to human rights is a key principle of our organizational culture. We promote and protect this principle as established in the UN Guiding Principles on Business and Human Rights. We are committed to pursuing opportunities that support human rights and that have an impact in the communities we serve.

Fair Employment Practices

We believe in equality and impartiality among individuals in our Company. We provide equal employment opportunities and strive for a diverse and inclusive workforce. Consequently, we must all comply with fair employment practices and applicable non-discrimination laws, as well as with affirmative action programs established at CETraC. CETraC expects its Service Providers to do the same.

Forced/Bonded Labour

CETraC has zero tolerance on modern slavery, forced labour and human trafficking. We ensure our operations are free from these unfair and illegal practices. We are committed to promoting, throughout our business partners and suppliers, the elimination of modern slavery, forced labour and human trafficking. Furthermore, no collaborator may be forced to work through acts of intimidation, acts of force, political coercion or any means of retaliation because of any form of expressing their political views.

Child Labour

We prohibit the hiring of individuals under the established minimum legal age allowed in the countries and regions in which CETraC's operations are located

Work Hours, Wages and Benefits

CETraC offers a competitive compensation as compared to its industry and the various local labour markets in the regions in which it operates. Our commitment is to ensure full compliance with applicable wage, hours and benefit laws. CETraC expects its Service Providers to take all necessary steps to ensure their workers meet the minimum legal age for employment, and that their service is fairly compensated and carried out under safe and healthy conditions.

Diversity and Inclusion

We promote diversity and inclusion as our formula for innovation. We embrace inclusion of our people, products and services, integrating diversity in our strategies and business decisions. We

believe in the integration and promotion of generational diversity as the key to achieving creative solutions that impact business results.

Our Company values and respects diversity among our collaborators and expects our workplace to be a reflection of this. Accordingly, we do not tolerate any form of discrimination, harassment or intimidation towards those working at CETraC, or against any colleague, applicant, customer, vendor, service provider or visitor, based on a person's race, colour, religion, gender, gender identity, sexual orientation, age, national origin, political affiliation or beliefs, social status, marital status, disability, genetic information, eligible veteran's condition, or as a victim of domestic violence, or any other classification protected by law. CETraC expects its Service Providers to also maintain zero tolerance policies against discrimination and harassment. Violation of CETraC's zero tolerance policy may result in the immediate termination of any contract, as well as civil and criminal penalties.

Privacy

CETraC is committed to protecting the confidentiality of its information and will prevent unauthorized disclosure of non-public information about CETraC, its customers, collaborators, Service Providers and other third parties. We use industry recognized security safeguards, such as firewalls, anti-virus, intrusion detection systems, and operational procedures to detect and preclude unauthorized parties from accessing our systems.

Relationship between Colleagues and Workplace Conduct

We strive to maintain a respectful and professional work environment. To maintain this ideal work environment, CETraC employees and CETraC Service Providers within our premises, should avoid obscene or disrespectful behaviour. Also -avoid inappropriate language, jokes or comments, such as those of racial, sexual, political or religious content, or in reference to a person's age, national origin or disability, or any other classification protected by law. Service Providers are required to disclose to the Compliance Director and Ethics Officer, through our confidential Ethics Line www.cetracgh.org, any relationship that could reasonably be expected to give rise to a conflict of interest or the appearance of such a conflict in the workplace.

Substance Abuse

We are committed to providing a drug and alcohol-free workplace to help promote a healthy and productive work environment. The misuse of controlled substances or selling, manufacturing, distributing, possessing, using or being under the influence of illegal drugs on the job is prohibited. Service Providers shall ensure that the employees, or representatives, assigned to handle tasks for CETraC are not providing services under the influence of drugs or alcohol in CETraC's premises or while performing services for CETraC. CETraC may terminate a contract if a Service Provider's employee, or representative, is found to be under the influence of drugs and/or alcohol while carrying out their duties for CETraC.

Health and Safety

We are committed to improving the well-being, health, and safety of our employees, clients, contractors, and Service Providers. Health and safety are the reasons why we constantly strive to maintain a risk-free and health-conscious work environment. We are committed to providing the appropriate conditions of a suitable work environment, to prevent risks in the operations. We expect our Service Providers to apply safe and healthy work practices to all their activities. Service Providers must report all injuries, incidents and actual or potential safety, health or environmental hazards involving work on CETraC's premises to CETraC's People and Culture Team (Human Resources Division), or through our confidential ethics line at www.cetracgh.org.

Our commitment to health and safety at work is as follows:

- We are responsible for identifying and controlling Occupational Health and Safety risks, ensuring the best working conditions.
- We are committed to complying with all applicable rules, laws and regulations related to Occupational Health and Safety in order to protect the health and physical integrity of our employees, Service Providers and visitors.
- We integrate Occupational Health and Safety practices as a business strategy for the continuous improvement of our performance in this area.
- We promote awareness and education in Occupational Health and Safety providing training programs for our employees.
- We are committed to providing the ideal work environment and conditions in order to prevent any risks in the Company's operations.
- We promote continuous improvement in Occupational Health and Safety.

Workplace Security: CETraC is proud of maintaining a safe and respectful work environment. Our rules and procedures are fair and equitable, which is why CETraC promotes an open-door policy where the direct opinion of our employees is valued, without intermediaries or third parties.

Right to Water: Water is fundamental for the life and good health of all human beings. CETraC has taken responsible actions to ensure collaborators and visitors have proper access to clean drinking water.

COMMUNITY

Social Responsibility

As part of our corporate culture of social responsibility, we encourage our collaborators to actively participate in organizations that promote the well-being of the communities where we are present.

Accordingly, philanthropic initiatives such as volunteer activities are, in many instances, supported. The public perceives our directors, officers, and collaborators as representatives of CETraC. The conduct outside of work may positively or negatively impact the image of our Company and the trust that our clients or potential clients may have on us.

Consequently, it is our social responsibility to get involved in helping our community. We contribute actively in our communities through our volunteer, social and scholarship programs. As our Service Provider, your actions and business practices can also impact, positively or negatively, the image of our Company and the trust that our existing or potential customers have on us. Therefore, you should always conduct yourself in a responsible and ethical manner.

Environmental Protection

CETraC is also committed to conducting our business in a way that protects the environment. Our commitment includes the advancement of programs that promote improvement of the environment, such as the Orange Revolution, renewable energy alternatives and recycling. Everyone who is part of CETraC is expected to contribute in protecting the environment. We encourage our Service Providers to share our commitment to environmentally responsible business practices.

CLOSING THOUGHTS

CETraC has always been recognized by its great professionalism and excellent reputation. CETraC's ethical principles of integrity, honesty and good faith provide the foundation for our business practices and standards. We require our employees to conduct themselves in a manner consistent with our ethical principles and we expect the same from our Service Providers.

This Code of Ethics for Service Providers defines and reaffirms these high standards and helps our Service Providers to fully understand CETraC's commitment to complying with all laws, rules and regulations applicable to the engaged services. When Service Providers make a commitment to work with CETraC, they also commit to maintaining the standards, ethical business practices and compliance requirements stated in this Code of Ethics for Service Providers. Service Providers must assure that their actions and performance always reaffirm their commitment to this Code.

We ask our Service Providers to share this Code with the individuals assigned to perform work for, or on behalf of, CETraC and expect their commitment to adequately train their employees on its requirements. The Code also encourages Service Providers to inform CETraC if they see an CETraC employee, or another Service Provider, engaging in questionable behaviour or acting in violation of our Code of Ethics.

We value our relationship with all of our Service Providers and expect you to follow our ethical business practices and to support effective ethics and compliance programs within your own organizations. We trust that you will be an integral part of our ever-growing ethical commitment.

With your help and cooperation, we will be able to avoid unethical behaviours and promote a respectful and positive environment in our workplace.

We appreciate your commitment to making ethics and compliance a top priority as you work with CETraC. This Code replaces any Code of Ethics previously adopted for Service Providers.

If you have any questions or want to report an ethics and/or compliance concern, you may contact the following resources at CETraC:

General Counsel: +233 (0) 508 116 498

Compliance and Ethics Officer: +233 (0) 244 218 418

Location: Same Building with Ga Rural Bank Ltd,
Adjacent Lucky Oil, Kwabenya-Accra

Postal Address: Post Office Box WY. 2367, Dome-Kwabenya.

Website: www.cetracgh.org

Email: info@cetracgh.org