DADAAB ROYAL

CODE OF ETHICS POLICY

DADAAB ROYAL COMPANY
INVESTMENT LIMITED

FOREWORD

This policy serves as a cornerstone of our dedication to guiding employees and directors behaviour and best practices at Dadaab Royal as a corporate entity. It reflects our dedication to promoting respect, dignity and code of ethics governance in our activities for all individuals within our organization and stakeholders.

Adherence to this code of ethics policy is mandatory for all staff and key stakeholders, as it forms the foundation of our commitment to eradicating corruption and other vices in society.

I unreservedly endorse this policy and encourage everyone to embrace its principles. Together, we can create an environment that promotes equality, respect, good corporate governance and a strong sense of community, where corruption and other forms of discrimination are not permitted at all levels.



Signed: _____

Managing Director

1.0 Personal Dignity and Respect

Personal integrity, practiced on a daily basis, is the foundation of corporate integrity. We are all expected to act with honesty and integrity at all times. We should operate with the highest standards of individual and corporate integrity. To that end, each of us is personally responsible for supporting Dadaab Royal core values.

We are committed to providing a work environment free of discrimination and harassment on the basis of race, color, national origin, sex, gender, gender identity or expression, sexual orientation, marital status, registered domestic partner status, citizenship status, religion, age, physical or mental disability, medical condition, genetic characteristics and information, ancestry, military and veteran status or any other category. We give equal employment opportunity to all individuals in compliance with legal requirements because it's the right thing to do.

We are committed to fostering an inclusive workplace where talented people work, thrive, contribute to DADAAB ROYAL success and develop their careers and the careers of our colleagues. Supporting a diverse, engaged workforce allows us to be successful in building trust, empowering teams, and delighting our customers.

2.0 Conflicts of Interest

A conflict of interest occurs when one's personal interests influence or could appear to influence one's ability to act in the best interest of Dadaab Royal. We address conflicts of interest in an ethical manner to ensure the decisions we make involving Dadaab Royal or its business are in the best interest of our Company. Our personal interests can affect our decisions even when we think they will not, and even the appearance of conflicts of interest can have a negative impact on the Company. You should disclose potential conflicts of interest

promptly and accurately, and to abide by any measures put in place by Dadaab Royal to protect its interests.

You have a conflict of interest if:

- Your actions or interests could prevent you from performing your duties in an honest, objective and effective manner
- You have an incentive to benefit yourself, your friends or family at Dadaab Royal
- You, your friends or family receive improper benefits as a result of your position at Dadaab Royal

Whether a conflict of interest exists is not always clear. When in doubt, please discuss the particular situation with your manager, a member of the People Success Team or navigate to the section “Ask Questions” on page 11 of this code for additional ways to ask questions and obtain guidance.

3.0 Honest and Ethical Conduct and Fair Dealing

We deal honestly, ethically and fairly with our customers, competitors, suppliers and each other. We have an absolute commitment to treat others with dignity, respect and equal opportunity. We conduct our business with honesty and integrity, and we expect our business partners' values and business practices to mirror ours regarding compliance with the law, product quality, safety, human rights, treatment of employees and environmental compliance.

We are and want to always be a company that is known for Doing the Right Thing.

4.0 Anti-Corruption and Anti-Bribery

We are committed to acting professionally, fairly and with integrity at all times, and to never engage in bribery, kickbacks or corruption.

Under applicable anti-bribery and anti-corruption laws, companies can be held responsible for the actions of third parties engaged to act on their behalf, even if the entity is unaware of or does not approve of the third party's actions. For that reason, please carefully review and attend to third party relationships, such as resellers, advisors, and contractors, and set clear expectations that bribery and corruption are not permissible under any circumstance.

5.0 Political Contributions

We are committed to fostering a "politics-free" environment at Dadaab Royal. Dadaab Royal funds are not used to support any political party, political committee, or candidate. Dadaab Royal complies with all laws and regulations governing campaign contributions in any federal, state or local election, in any country. All team members are free to use their own funds to make individual political contributions in accordance with applicable law. Dadaab Royal will not provide reimbursement in any form for political contributions.

6.0 Charitable Contributions

We recognize our responsibility to the community at large. Being an active participant in our community is a fundamental responsibility. We work hard to ensure that giving back to the communities where our employees work and live, and to making the world a better place, is a theme that runs throughout our business. This commitment is exemplified by the number of Dadaab Royal employees involved in charitable organizations around the world as well as the support we provide to these organizations. Our commitment is more than a corporate program, it's part of the people and the culture at Dadaab Royal. To learn more about Dadaab Royal philanthropic programs, please refer the Dadaab Royal Profile.

7.0 Social Responsibility and Sustainability

Dadaab Royal is fully aware of the broader impact a company like ours can have on our communities and our planet. The core of Dadaab Royal business is to help organizations transition from paper checks to electronic payments, which in and of itself has a significant environmental impact. Our physical locations offer both single-stream recycling and electronic recycling.

We work to minimize our environmental footprint by recycling materials during construction and renovation of our properties. We use censored lighting, regulated HVAC systems, energy saving appliances, windows and doors, as well as furnishings and carpet made with recycled materials and on-site water purification systems to reduce the number of plastic bottles used. We are climate change sensitive and compliant.

Sustainability is a way of life at Dadaab Royal and it is exemplified through our products, customer interactions and employee engagement.

8.0 Records and Money

Please honestly and accurately report all business transactions and remember that you are responsible for the accuracy of your records and reports. Accurate information and reporting are essential to Dadaab Royal ability to meet legal and regulatory obligations. It is Dadaab Royal policy to provide full, fair, accurate, timely and understandable disclosure in reports and documents filed with, or submitted to, the Revenue Authority. Team members may not enter into side agreements on behalf of the Company, whether written or verbal, which are intended to alter or provide additional terms, conditions or commitments that are not reflected in the actual agreement with a third party.

We are required to accurately account for all Dadaab Royal money and spend it only on lawful Dadaab Royal - related purposes. If our duties involve verification of expenditures or requests for reimbursement, we are each responsible for verifying that our expenditures legitimately comply with Dadaab Royal policies and applicable laws, and that the amount of reimbursement received is accurate. We are each responsible for safeguarding Dadaab Royal assets, and therefore we need to ensure proper accounting of expenses incurred as well as accurate payment of reimbursement requests. All requests for reimbursement should be submitted on a timely basis and be supported by original receipts. In addition, our expenditures must be properly recorded and comply with all applicable Dadaab Royal policies, including the Travel and Expense Reimbursement Policy and HR Manual.

9.0 Public Disclosure

All of our public communications, including filings with the Revenue Authority, need to be accurate, timely and understandable. If any team member becomes aware of any material information or omission that may make our public disclosure misleading or inaccurate.

10.0 Safeguard Good Name and Reputation

Dadaab Royal good name is in your hands. We should always conduct ourselves in a manner that is consistent with protecting the Company's good name and reputation. To that end, please do not make, or cause others to make, any false, disparaging or derogatory statements in public or private to any person, entity, media or social media outlet regarding Dadaab Royal products, business affairs, financial condition, or relationship with any of its customers.

11.0 Confidential Information

We keep confidential information remain confidential. To earn and maintain the trust of our customers, we commit to maintain confidentiality and protect not only our own confidential information, but that of third parties that entrust us with their sensitive and confidential information.

Please maintain the security, privacy and integrity of confidential information from Dadaab Royal or any other entity including customers or other third parties with whom we do business. Confidential information of Dadaab Royal or any other entity should not to be shared with other team members unless they have a need to know the information to perform their job.

Third parties may ask you for information about Dadaab Royal. Please do not discuss internal confidential Dadaab Royal matters or share internal confidential information with anyone outside of Dadaab Royal, except as required by your job or role and after an appropriate confidentiality agreement is in place. This applies particularly to inquiries concerning Dadaab Royal from the media, investment professionals (such as securities analysts, institutional investors, investment advisers, brokers and dealers) and security holders, as well as to any form of social media. If you receive any inquiries of this nature, please decline to comment and refer the inquirer to one of our official spokespersons.

12.0 Human Rights

Dadaab Royal is committed to the protection and preservation of human rights around the world. Our commitment to human rights is embedded in the culture and values that define our company and is reflected in our policies and actions toward our employees, partners, suppliers, and the communities and countries where we do business.

We require our business partners to exhibit respect for fundamental human rights and human dignity and respect for the equal rights of men and women while doing business with us.

We are committed to an inclusive, safe and ethical workplace as demonstrated within our Equal Employment Opportunity Statements and our other People Success policies.

13.0 Anti-Money Laundering

Dadaab Royal is committed to the fight against money laundering, which continues to be the focus of considerable attention by governments, international organizations and law enforcement agencies around the world. This is an issue that we take extremely seriously.

- Money laundering is the process of concealing illicit funds or making them look as though they are legitimate. This includes concealing the criminal origin of money or other property – sometimes called the proceeds of crime – within legitimate business activities. It also covers the use of legitimate funds to support crime or terrorism.
- We never condone, facilitate or support money laundering, which means:
- We will always comply with anti-money laundering laws and regulations which generally includes identifying clients, monitoring client activity and reporting suspicious or unusual activity consistent with applicable laws.
- We will seek to minimize money risks through our anti-money laundering policies and practices. These are designed to avoid receiving, or being involved in an arrangement or transaction that relates to funds that may be the proceeds of crime.
- We take reasonable and appropriate actions to identify and assess the integrity of our business partners. We should be vigilant and exercise good judgment when dealing with unusual customer transactions.

We each play a role in actively guarding against the use of our brand, products and services for money laundering.

14.0 Use of Intellectual Property and Proprietary Information

Dadaab Royal intellectual property (patents, copyrights, trademarks, trade secrets) and other proprietary information are valuable assets. Protecting these assets, including documenting their creation and maintaining their secrecy, is critical to Dadaab Royal continued success. Patentable inventions include new and useful products, compositions, devices, methods, and techniques. Trademarks include words or symbols used to identify the entity and its products and services. Copyrights protect creative expression, but can include things such as software product labels, manuals and website content. Trade secrets include data or information that is treated as secret, derives value from not being known outside Dadaab Royal, and that is unavailable to those outside Dadaab Royal except under confidentiality agreements. Proprietary information includes data or other

information that has been developed or assembled on Dadaab Royal (or a third party's) time or at Dadaab Royal (or a third party's) expense and is non-public or not easily determined or re-created by others.

It is our duty to protect Dadaab Royal intellectual property and proprietary information, and not share such information with anyone outside or within Dadaab Royal who is not authorized to receive and does not have a business need to receive that information.

All material used in the course of our business that is protected by the intellectual property rights of others must be appropriately used with permission from the third party that owns or controls such rights. Questions about whether permission is needed, or whether the material may already have been licensed by Dadaab Royal, should be directed to the Legal Team.

15.0 Protection of Corporate Assets

All team members play a role in protecting Dadaab Royal assets and using those assets efficiently and appropriately. Assets provided to team members by Dadaab Royal, including desktops, laptops, mobile devices, and Dadaab Royal data stored within them, remain the exclusive property of Dadaab Royal. Theft, carelessness and waste have a direct impact on Dadaab Royal financial performance. Please report loss of any Dadaab Royal device or data to your manager and the Information Technology department.

Please keep in mind that Dadaab Royal intellectual property includes not only patents and trademarks, but also trade secrets, know-how and other product and technical information that is not publicly known. Protection of this intellectual property is critical to Dadaab Royal continued success. Please use care not to purposefully or inadvertently disclose this information to parties outside of Dadaab Royal. There may be instances when disclosure of intellectual property to third parties is appropriate, in which case team members should seek guidance from Dadaab Royal Legal Team prior to any such disclosure, to ensure that appropriate protections are in place.

16.0 Social Media and Other Online Activity

Those of us who use online communication tools like blogs, social media sites and other digital platforms — whether on our own personal time or in an official capacity on behalf of Dadaab Royal — assume responsibility for ensuring that our activities comply with Dadaab Royal policies and laws or regulations.

Any time we endorse or promote Dadaab Royal or any of our products in a forum in which our connection to Dadaab Royal is not obvious, whether in person or online, we need to disclose our connection to Dadaab Royal. Such disclosure should be clear and conspicuous, readily visible within our communication, and understandable and apparent to the average reader near the beginning of the communication.

If we use social media or other forums to express our personal views regarding Dadaab Royal, our products or our competitors, we should indicate that our comments do not represent the positions, strategies or opinions of Dadaab Royal. If we engage or provide something of value to a consultant, agency, celebrity, consumer, blogger or other party to entice or encourage them to review, promote or endorse Dadaab Royal or our services and products, we must ensure that those parties also disclose their affiliation with Dadaab Royal.

These requirements apply even to comments we make on our own personal blog or social media pages or on third-party websites, as well as to actions we take on Dadaab Royal - affiliated websites, such as product ratings and reviews and our brands' social media pages.

17.0 Assistance with Audits

Our commitment to accurately and honestly reflect the business transactions of Dadaab Royal relies on an open and honest relationship with independent auditors. No team member shall, directly or indirectly, make or cause to be made a materially false or misleading statement (or omit to state, or cause another person to omit to state, any material fact necessary in order to make statements made, in light of the circumstances under which such statements were made, not misleading) to an accountant in connection with any audit, review or examination of Dadaab Royal financial statements or the preparation or filing of any document or requisite report.

If you have a concern or complaint regarding an accounting or auditing matter or internal accounting controls, you may confidentially and anonymously submit those concerns or complaints in writing at the addresses provided at the end of this Code. Any such concerns or complaints may also be communicated confidentially and, if you desire, anonymously, pursuant to Dadaab Royal Whistleblower Policy. All complaints will be reported to the Audit Committee.

18.0 Non-Retaliation Policy

Each team member can make a tremendous difference to this organization, so it is vital that we all act with integrity, respect and in accordance with applicable laws. Dadaab Royal will not discipline, discriminate or retaliate against any team member who reports a complaint or concern in good faith.

If you or someone you know is the victim of retaliation, report it immediately to any of the Dadaab Royal resources available for reporting.

It is a violation of our Code to retaliate against anyone for cooperating with or participating in an investigation involving possible violations of the law, our Code or other

Dadaab Royal policies, even if the investigation finds no evidence of misconduct. Anyone who retaliates against a person for participating in an investigation will be subject to disciplinary action, including termination.

19.0 Ask Questions

We have a responsibility to ourselves, each other and Dadaab Royal to conduct business legally and ethically. We should be alert to activities going on around us and speak up if we suspect illegal or unethical conduct by any employee, contractor, vendor, supplier, director, customer or other person working for or on behalf of Dadaab Royal.

Sometimes, it might seem easier to "look the other way," but doing nothing is, in itself, an action that can have serious consequences for us as individuals and for Dadaab Royal. Participation and commitment to monitoring the integrity of our business conduct is instrumental in sustaining our ethical culture. If we do not speak up, Dadaab Royal cannot address the problem.

If we suspect that someone is behaving illegally or unethically, or that an actual or potential violation of the Code or Dadaab Royal policy has occurred, each of us is responsible for reporting it.

Ways to Raise Questions and Report Concerns:

- Speak to the Managing Director
- Contact the MD at dadaabroyalinvestmentltd@gmail.com