



PT. KELLYS EXPRESS

CODE OF CONDUCT

Commercial & Confidential



CODE OF BUSINESS CONDUCT AND ETHICS

INTRODUCTION

This Code of Business Conduct and Ethics applies to all employees, officers and Managers of Kellys Express.

It provides rules and regulations to help you recognize and respond to ethical issues and to guide you in the course of conducting Kellys Express business. However, many of the principles described in the Code are general in nature, and the Code does not specifically address every specific situation that may arise. You will need to use common sense and good judgment in applying the Code to your daily business conduct.

This Code of Ethics and its principles also apply to all contractors, consultants, vendors, customers, and others who do business with or on behalf of Kellys Express.

Nothing in this Code should be construed to create an employment relationship with such third parties, and Kellys Express retains the right to end working relationships with those who violate the law or otherwise violate this Code.

Your full compliance with this Code is mandatory, and those who violate the standards in this Code may be subject to disciplinary action, including but not limited to termination of employment with Kellys Express.

Kellys Express is committed to continuously reviewing and improving its policies and procedures, and therefore reserves the right to amend this Code at any time. We welcome your suggestions for improving our policies and procedures and supporting a culture of transparency, integrity and honesty.

EMPLOYEES/STAFF RESPONSIBILITIES TO KELLYS EXPRESS

As a member of Kellys Express, you are expected to actively participate in maintaining the ethical standards of our organization and, as part of your commitment to Kellys Express and your ethical responsibilities, you are expected to do the following:

- Read and understand this Code of Conduct
- Uphold these standards in your day-to-day activities and comply with all applicable policies and procedures in the Code;
- Help enforce this Code by being alert to possible violations and promptly reporting violations or suspected violations of this Code.
- Be truthful, forthcoming, and cooperative with investigations into possible Code violations.
- Not participate in or condone any reprisals, threats, retribution, harassment or retaliation against any person who has in good faith reported a violation or a suspected violation of this Code or is assisting in any investigation or process related to such a violation.



Keep these steps in mind in trying to determine whether any particular action is appropriate:

- Obtain all relevant facts;
- Assess the responsibilities and roles of those involved;
- Use your judgment and common sense to evaluate whether the action seems unethical or improper; and
- Seek guidance as necessary. If you are unsure about any situation or any provision of the Code, you can discuss the matter with your manager.

If you are a manager, it is your responsibility not only to read and understand the Code but also to assist those employees on your team, or any other employee who seeks your assistance, in understanding and carrying out their responsibilities under this Code. Part of your role as a manager is to make yourself available to provide guidance to employees who approach you with questions, whether they be about this Code, their ethical, legal business responsibilities or simply an issue they want to discuss with you.

KELLYS EXPRESS'S RESPONSIBILITIES TO YOU

To satisfy the principles outlined in this Code, Kellys Express must maintain a workplace that fosters strong ethical principles and allows employees who reasonably and in good faith believe that they are aware of any breach of the Code to raise these concerns through a secure medium, free of any discrimination, retaliation or harassment. To that end, Kellys Express will:

- Establish policies and procedures necessary to facilitate company-wide compliance with the Code of Conduct and investigation of any violations or potential violations;
- Review and improve those policies on an ongoing basis;
- Maintain an open door policy that provides employees with various resources for seeking advice and reporting concerns.
- Treat all violations of the Code seriously; conduct prompt, fair investigations of potential violations; impose appropriate penalties; if necessary, report such violations to the appropriate authority; and take proper remedial actions;
- Ensure that nobody who reports or participates in investigation of a violation or potential violation of the Code suffers reprisals, threats, retribution or retaliation as a result; and
- Provide training from time to time that will help you to understand your obligations under this Code and enable managers to assist their team members in complying with the Code.



STANDARDS OF BEHAVIOUR EXPECTED

The President Director has overall responsibility for the maintenance of conduct and discipline in the office. He also has a duty to ensure that employees' rights are respected.

As an employee you have a right to:

- Be spoken to politely
- Be treated with respect
- Be treated fairly and courteously by colleagues and those outside the organization for whom we work
- Be treated fairly in recruitment, training and promotion
- Have your private life and commitments outside work respected
- Have your point of view listened to and considered
- Expect not to be harassed or intimidated at work and in particular have a right not to be harassed or intimidated because of their race, gender, color, ethnic or national origin, religion, disability, marital status, age or sexuality
- Speak out if you are the victim of bullying, harassment or intimidation and have your complaint taken seriously and properly investigated

As an employee you have a responsibility to:

- Act professionally in your dealings with colleagues - treat colleagues as individuals and show sensitivity to their needs
- Treat complainants, those investigated and other stake holders with fairness, courtesy and sensitivity to their needs and the situation they are in
- Consider others in the exercise of your duties
- Keep in mind the limitations of your own experience and value others' perspectives and experience
- Express your point of view without being aggressive or overbearing
- Listen to what others say and respect their point of view
- Learn from your mistakes
- Try to find solutions and work through disagreements with others
- Take responsibility for your own learning and development
- Take action if you witness or are made aware of any improper conduct, including any act of harassment or discrimination.
- Not to discriminate on basis of caste, cult, religion, race, ethnicity
- Not to put pressure on others to discriminate unlawfully
- Challenge attitudes which demean or denigrate other people (individuals or groups) and develop self-awareness of the impact of your own behavior.
- Ensure that your behavior (at work or outside) and your appearance at work whilst representing Kellys Express, does not cause embarrassment to Kellys Express or reflect negatively on Kellys Express in a way that would bring the reputation of Kellys Express into disrepute or cause a loss of public confidence in our work .



Principles of the Code

The Code of Business Conduct is based on the following principles that form part of the company's business objectives and outline the practices to be adhered to by all employees:

- Integrity
- Impartiality
- Loyalty
- Legality
- Confidentiality
- Fairness

Principles and Practices

- 1.. Be Loyal to the company at all times during the tenure of employment.
 2. Do not share or make public information related to the company or its personnel.
 3. Comply with laws, rules, and regulations of federal, state, provincial and local governments specially laws on Anti Bribery/Corruption.
 4. Act with honesty and integrity, avoiding actual or apparent conflicts of interest in personal and professional relationships.
 5. Provide customers and stakeholders with information that is accurate, complete, objective, relevant, timely and understandable.
 6. Act in good faith, responsibly, with due care, competence and diligence, without misrepresenting material facts or allowing independent judgment to be subordinated.
 7. Respect the confidentiality of information acquired in the course of business except when authorized or otherwise legally obligated to disclose the information.
 8. Refrain from using confidential information acquired in the course of business for personal advantage.
 9. Share knowledge and maintain skills important and relevant to customer's needs.
 10. Refrain from acts of sexual Harassment. Promptly bring it to the attention of the Quality or HR Manager if such an act occurs or is perpetrated.
 11. Strictly refrain from use of drugs and Alcohol during office hours.
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12. Must never be found with any kind of ammunition or harmful material.
13. Must always make sure that all his/her actions are in complete conformity with the company's environmental laws.
14. Protect and ensure the efficient use of assets and resources employed by or entrusted to such employee.
15. Promote ethical behavior as a responsible partner among peers in the work environment and the community.
16. Promptly bring to the attention of the President Director (i) significant or material deficiencies or weaknesses in the design or operation of the Company's internal controls, (ii) any fraud, whether or not material, or any actual or apparent conflict of interest between personal and professional relationships, involving any member of management or other employee who has a significant role in the Company's financial reporting, disclosures or internal controls, or (iii) any other matters which could have a material adverse effect on the Company's ability to record, process, summarize and report financial data.
17. Produce full, fair, accurate, timely and understandable disclosure, in compliance with applicable accounting standards, in any reports or documents that the Company files with, or submits to or any applicable regulatory body and in other public communications made by the Company.
18. Comply with the provisions of any other applicable Company policies or guidelines.
19. Promptly report any possible violation of this Code to The Quality Manager or to the Company's President Director. In the alternative, reports of violations of this Code of Conduct or other reports under this Code may be made anonymously in accordance with the employee hotline procedures.
20. Annually certify to compliance with this Code.