

COMPLIANCE POLICY



Code of Conduct

Customs Clearance, Transit & Logistics — Ex-Grand Katanga, D.R. Congo

Document Title	Code of Conduct
Document Owner	CORRIDEX SARL — Management
Version	1.0
Effective Date	[DATE]
Review Cycle	Annual, or upon regulatory change
Applies To	All employees, contractors, agents, and representatives of CORRIDEX SARL

1. Purpose and Scope

CORRIDEX SARL ("CORRIDEX," "the Company") operates in customs clearance, transit, and transport brokerage across the Democratic Republic of Congo and the wider Southern African corridor. This Code of Conduct sets out the standards of integrity, professionalism, and ethical behaviour expected of every person acting on behalf of CORRIDEX — employees, managers, directors, agents, subcontracted transporters, and any third party representing the Company in dealings with customers, state authorities, or business partners.

Our sector carries particular exposure: we interact daily with customs officials, border authorities, mining companies, and international trading houses, often handling high-value cargo and sensitive documentation under time pressure. This Code exists to protect the integrity of that work, the safety of our people, and the trust our clients place in us.

2. Our Core Principles

2.1 Integrity in Customs and Transit Operations

Every declaration, certificate, invoice, and document submitted by CORRIDEX to any state authority (DGDA, OCC, OGEFREM, FPI, SAEMAPE, or any other body) must be accurate and truthful. We do not falsify quantities, values, classifications, or origins of goods, regardless of client pressure, time constraints, or perceived industry norms.

KEY PRINCIPLE

CORRIDEX competes on the basis of expertise, speed, and reliability — never on the willingness to circumvent customs law.

2.2 Lawful Conduct at All Times

Employees and representatives must comply with the laws of the Democratic Republic of Congo, the laws of any transit or destination country in which CORRIDEX operates (South Africa, Zambia, Tanzania, Zimbabwe, Angola), and applicable international trade and sanctions regulations.

2.3 Respect and Professional Conduct

All interactions — with colleagues, clients, drivers, customs officers, and the communities in which we operate — must be conducted with dignity and respect. Discrimination, harassment, or abusive behaviour of any kind is not tolerated.

2.4 Conflicts of Interest

Employees must disclose any personal, financial, or family relationship that could reasonably influence — or appear to influence — a business decision, particularly in the selection of transport subcontractors, customs brokers, or suppliers. Undisclosed conflicts of interest undermine the trust our clients place in our judgement.

- Employees may not award subcontracts to companies in which they or a close family member hold an undisclosed interest.
- Gifts, hospitality, or favours from current or prospective business partners must be declared if they exceed modest, customary value (see Anti-Bribery and Anti-Corruption Policy).

2.5 Confidentiality

Client cargo details, commercial terms, shipment routings, and pricing are confidential. This information must not be disclosed to competitors, unauthorised third parties, or used for personal benefit.

2.6 Fair Dealing with Authorities

CORRIDEX maintains professional, respectful, and lawful relationships with DGDA, OCC, OGEFREM, FPI, provincial mining authorities, and border police. We do not offer, solicit, or accept any payment, gift, or favour intended to improperly influence an official decision. Genuine, lawfully payable fees, duties, and taxes are always paid through proper channels with documented receipts.

2.7 Health, Safety, and Environment

All operations — warehouse handling, border crossings, and road transport — must follow the Company's Health, Safety, and Environment Policy. Cutting corners on safety to save time is never acceptable.

3. Specific Conduct in Our Sector

3.1 At the Border

- Never offer payment to expedite clearance outside official, receipted channels.
- Document every delay, inspection, and interaction with border officials accurately for the client file.
- Treat all border and customs personnel with professionalism, regardless of delays or frustration.

3.2 With Transport Subcontractors

- Select transporters based on safety record, reliability, and fair pricing — not personal relationships alone.
- Ensure subcontracted drivers are licensed, vehicles are roadworthy, and cargo is properly secured.
- Report any subcontractor engaging in smuggling, document fraud, or unsafe practices immediately to management.

3.3 With Mining and Industrial Clients

- Handle hazardous or sensitive cargo (sulfuric acid, reagents, mining equipment) strictly according to documented procedures.
- Never misrepresent the nature, quantity, or value of cargo, including for clients requesting expedited or informal handling.

4. Reporting Concerns

Any employee, contractor, or third party who becomes aware of a violation of this Code — including bribery, fraud, falsified documentation, or unsafe practices — must report it promptly to management. Reports made in good faith will not result in retaliation, demotion, or any adverse treatment against the person reporting.

HOW TO REPORT

Speak directly to your manager or to CORRIDEX SARL management.

Reports can be made verbally or in writing, and may be made confidentially upon request.

CORRIDEX will investigate all credible reports and take appropriate corrective action.

5. Consequences of Non-Compliance

Violations of this Code may result in disciplinary action, up to and including termination of employment or contract, and may be reported to the relevant authorities where required by law. Subcontractors or agents found in breach may have their relationship with CORRIDEX terminated immediately.

6. Acknowledgement

All employees and representatives of CORRIDEX SARL are required to read, understand, and acknowledge this Code of Conduct upon joining the Company and annually thereafter.

Acknowledged by:

Name: _____ Signature: _____ Date: _____
