Code of Business Ethics

UNI-K DRC SARL · December 2026. This code applies to the managers, employees and consultants of UNI-K, and to anyone acting on its behalf. Everyone reads and signs it when they join.

1. Respect for the law

We comply with the laws of the DR Congo and of the countries where we sell. Where a rule in this code is stricter than the law, we apply the code.

2. No bribery

- We do not give, promise or accept any payment, gift or advantage intended to obtain a decision, a licence, an inspection or a contract.
- This applies to public officials and to private persons alike, directly or through an intermediary.
- "Facilitation payments" to speed up a formality are prohibited.
- Every official tax, levy or fee is paid against a receipt in UNI-K's name and recorded in the accounts.
- Any request for an illegal payment is refused and reported to management.

3. Gifts and hospitality

A gift or invitation may be accepted only if it is modest, occasional and unrelated to any pending decision. Anything above USD 50 is declared to management, which decides whether it is kept or returned.

4. Conflicts of interest

Everyone declares in writing any personal or financial link with a supplier, customer, transporter or public official that UNI-K works with. The person concerned takes no part in the decision.

5. Know our customers and suppliers

- Before a first transaction, we check the identity and legal existence of the customer or supplier.
- We do not deal with any person or company subject to sanctions of the United Nations, the European Union, Switzerland or the United States.
- We do not buy cocoa whose sale finances an armed group, nor cocoa that has passed through an illegal checkpoint.

6. Payments and records

Every purchase and every sale is backed by a written document: purchase slip, receipt or invoice. Cash payments are recorded the same day. No payment is made to a third party that is not part of the transaction.

7. Fair competition

We do not agree with other buyers to fix the prices paid to farmers or to share out buying areas.

8. People and environment

We treat our employees and suppliers with respect, without discrimination or harassment. We apply the rules of our Supplier Code of Conduct to ourselves: no child labour, no forced labour, no deforestation.

9. Information and data

Information about our customers, prices and suppliers stays confidential. Farmers' personal data is used only for traceability and payments.

10. Reporting and sanctions

Any breach of this code can be reported to ethics@unik-cocoa.com, following the grievance mechanism below. A breach may lead to disciplinary action, up to dismissal or termination of the contract.

Grievance mechanism

Anyone can report a breach of these two codes: an employee, a farmer, a customer, a neighbour or an NGO.

1. **Channel.** By email to ethics@unik-cocoa.com, or in person to the manager in Beni. Reports may be anonymous.
2. **Acknowledgement** within 7 days when a contact address is given.
3. **Review** by someone not implicated in the report. If management is concerned, the report goes to the shareholder, Unite Logistics.
4. **Response** on the follow-up, normally within 30 days.
5. **Confidentiality and protection.** The reporter's identity is shared only with their consent. No sanction or retaliation for a report made in good faith, even if it proves unfounded.
6. **Register.** Every report and its follow-up are logged in a register, reviewed once a year together with the update of the codes.