



KAYUWAWA PROPERTIES LTD.

OFFICIAL AGENT CODE OF CONDUCT (COC-2025)

Effective Date: April 15, 2025

Applies to: All Verified Agents, Associates, and Field Representatives

Version: 1.0

Prepared by: Legal & Compliance Unit – Kayuwawa Properties Ltd.

1. PURPOSE

The Kayuwawa Code of Conduct (COC) serves as the official ethical and behavioral guideline for all individuals acting on behalf of the company. It sets out minimum standards for integrity, impartiality, professionalism, and lawful conduct, particularly in the execution of land-related due diligence assignments.

2. CORE PRINCIPLES

Every Kayuwawa Agent must uphold the following values:

Principle	Description
Integrity	Be truthful, consistent, and morally upright in all actions and reporting.
Confidentiality	Protect client data and information from unauthorized access or sharing.
Neutrality	Do not take sides in disputes; report findings fairly and impartially.
Transparency	Disclose any limitations, red flags, or issues discovered in the field.
Professionalism	Exhibit respect, clarity, and calmness in all communications.
Accountability	Take responsibility for actions and omissions.

3. BEHAVIORAL EXPECTATIONS

A. In the Field:

- Always introduce yourself clearly using your full name and show your official Kayuwawa ID badge.
- Dress neatly and appropriately for the area and occasion.
- Explain your mission honestly and respectfully to locals and officials.
- Never engage in gossip, intimidation, or biased commentary.

B. During Interviews:

- Do not falsify, coach, or bribe witnesses for favorable answers.
- Allow community members to decline participation without pressure.
- Avoid leading questions; allow natural expression.
- Respect cultural customs and boundaries when engaging households.

C. Report Writing:

- Only report what has been seen, heard, and confirmed.
 - Do not include assumptions or personal opinions.
 - Clearly label unverified claims or conflicting testimonies.
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4. DOCUMENT & DATA HANDLING

- Store collected information only on secure, approved systems.
 - Do not save client data to personal or shared devices.
 - Do not share documents via unapproved third-party apps (e.g., WhatsApp, Facebook).
 - Once documents are uploaded to the Kayuwawa system and confirmed, delete local copies.
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5. CONFLICTS OF INTEREST

Agents must immediately disclose if:

- They are related to any party involved in the transaction.
- They have previously worked with the seller, buyer, or LC official involved.
- They have any financial or political interest in the land under review.

Failure to disclose a conflict will result in disqualification from the assignment and disciplinary review.

6. PROHIBITED CONDUCT

Offense	Penalty
Falsifying reports	Immediate termination + forfeiture of payment
Taking bribes or side payments	Permanent ban and legal prosecution
Fabricating interviews or documents	System blacklisting
Repeated lateness or absenteeism	Suspension or performance probation
Using Kayuwawa branding for personal gain	Legal action and revocation of ID
Mishandling disputes or intimidation	Immediate review by Compliance Committee

7. CLIENT & COMMUNITY RELATIONS

- Treat all clients equally regardless of background, language, or perceived influence.
 - Do not make verbal promises or legal interpretations about land ownership.
 - Avoid collecting money or gifts from anyone during your assignments.
 - Be responsive, polite, and helpful in communication with both clients and administrators.
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8. INCIDENT REPORTING

If you experience:

- Threats in the field
- Disputes over land boundaries
- Intimidation from local leaders or owners

→ Report immediately via the Agent Portal or call the compliance hotline.

9. ACKNOWLEDGEMENT

All agents are required to sign an Agent Agreement that includes this Code of Conduct during onboarding. Periodic reaffirmation may be requested as part of quality assurance or annual review.

10. SUPPORT & DISCIPLINARY REVIEW

For clarification, complaints, or to report violations:

Email: bamboobantu@gmail.com

Hotline: +256 705 915 321

Whistleblower Form: Available in the Agent Portal

Violations will be reviewed by the Kayuwawa Compliance & Ethics Committee. Agents have the right to respond during disciplinary investigations.

Approved by:

Managing Director – Kayuwawa Properties Ltd.

Review Schedule: Annually or upon major policy change

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