CODE OF ETHICS - EDUTEQ LIMITED

Eduteq Limited ('the Company') seeks to conduct its business honestly and ethically, and with the highest level of professional integrity and requires its business partners and any other contracted third parties to act in accordance with this Code. Its business activities are subject to the requirements of UK legislation, including the UK Bribery Act 2010, wherever in the world they are carried out. Similarly, the Company's work on behalf of Multilateral Development Banks ('MDBs') is subject to their specific rules and procedures designed to combat corrupt practices. It is the responsibility of all officers, directors and employees to familiarise themselves fully with the Company's Anti-Corruption Procedures ('ACP') and its annexes, which outline its commitment to the prevention of such conduct, and how it has implemented measures to put that commitment into practical effect.

The Company strives to constantly improve the quality of its services, products and operations and will work towards securing a reputation for fairness, respect and trust. The Company prohibits its officers, directors, employees and affiliates from carrying out illegal or unethical conduct on its part, none of which are in the company's best interest. It will not compromise its principles for short-term advantage and its ethical performance is the sum of the ethics of the men and women who work for it, all of whom are expected to adhere to high standards of personal integrity.

Officers, directors, and employees of the Company must never permit their personal interests to conflict, or appear to conflict, with the interests of the Company, its clients or affiliates. Officers, directors, and employees shall refrain from using Company contacts to advance their own private business or personal interests at the expense of the Company, its clients or affiliates. No bribes, kickbacks or other similar remuneration or consideration shall be given to any person or organisation in order to attract or influence business activity.

Officers, directors and employees will often come into contact with, or have possession of, proprietary, confidential or business-sensitive information and must take appropriate steps to ensure that such information is strictly safeguarded. This information – whether it is on behalf of the Company or any clients or affiliates – includes strategic business plans, operating results, marketing strategies, customer lists, personnel records, upcoming acquisitions and divestitures, new investments, and manufacturing costs, processes and methods. Proprietary, confidential and sensitive business information about the Company, other companies, individuals and entities should be treated with sensitivity and discretion and only be disseminated with care and relevant permission.

Officers, directors and employees will seek to report all information accurately and honestly, and as otherwise required by applicable reporting requirements.

Officers, directors and employees will not gather competitor intelligence by illegitimate means and they shall refrain from acting on knowledge that has been gathered in such a manner. The Company's officers, directors and employees will seek to avoid exaggerating or disparaging comparisons of the services and competence of their competitors.

Officers, directors and employees will obey all Equal Employment Opportunity laws and act with respect and responsibility towards others in all of their dealings.

Officers, directors and employees agree to disclose unethical, dishonest, fraudulent and illegal behavior, or the violation of Company policies and procedures, directly to management.

Violation of this Code of Ethics can result in disciplinary action, including possible termination of employment or contractual relations. Information reported by an employee or associated persons about actual or suspected behaviour which violates this Code will be treated in the strictest confidence, subject to any legal requirement to report the matter to the law enforcement agencies.