



Partner Code of Conduct

Building a strong partnership

Jumia is the leading pan-African e-commerce platform, present in multiple countries across Africa.

Our mission is to improve the quality of everyday life in Africa, by leveraging technology to deliver innovative, convenient and affordable online services to consumers, and helping businesses grow as they use Jumia's platform to better reach and serve consumers.

Opportunity comes with responsibility and, at Jumia, we are fully aware of the responsibility we bear towards our customers, employees, communities and shareholders, to achieve our mission in an ethical and sustainable manner.

We rely on all partners we work with, including our suppliers, contractors and consultants (together our "Partners") to achieve our mission. When we choose to work with you, we expect you to share our commitment to the highest standards of ethical conduct, good citizenship and sustainable behaviour. By working together on issues ranging from business ethics and integrity; to human rights and labour standards; and health, safety and the environment, we believe that we can have a positive impact on people and communities, as we work towards our mission.

Please read this Partner Code of Conduct as a guide to the shared principles that will help us to build a strong partnership.

Business ethics and integrity

We abide by and uphold the letter and the spirit of the law in all that we do, and we believe in succeeding through honest competition. We seek to demonstrate the highest standards of integrity and ethical business conduct.

We expect that our Partners will abide by all applicable laws and regulations, and take all reasonable measures to play a part in combating illegal activity, including bribery and corruption, money laundering, tax evasion and other forms of fraud.

Bribery and corruption

The OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions prohibits the use of bribery or corruption in order to obtain or retain business or other improper advantage in the conduct of international business, and antibribery and corruption laws prevail across the countries in which we operate.

Jumia takes a zero-tolerance approach to any level of bribery or corruption. Any bribes paid to government officials or private individuals by our Partners put us at significant legal and reputational risk.

We expect our Partners to:

- comply with all applicable antibribery and corruption laws, including the UK Bribery Act¹ and the US Foreign Corrupt Practices Act²;
- never seek to obtain advantage through offering, paying or funding anything of value; and
- immediately report to Jumia any concerns with regard to bribery or corruption by any Jumia employee or relating to Jumia's business.

Conflicts of interest

A conflict of interest can arise when a personal, family, financial or other interest impairs a Partner's ability to make the right decisions on behalf of Jumia, or gives them an unfair competitive advantage. The most common cases of conflict of interest occur in the course of procurement decisions, consulting activities, and the use of company resources.

Jumia actively monitors and investigates all conflict of interests and potential conflicts of interest, including requiring declarations of compliance from employees and Partners.

We expect our Partners to:

- at all times act in good faith towards Jumia;
- inform us if they are related to an employee of Jumia;

¹ http://www.legislation.gov.uk/ukpga/2010/23/pdfs/ukpga_20100023_en.pdf

² <https://www.justice.gov/criminal-fraud/statutes-regulations>



- be vigilant, and recognise and disclose conflict of interest situations or potential conflict of interest situations; and
- work with Jumia to ensure that appropriate action is taken in respect of any potential conflicts of interest. In many cases, simply disclosing the conflict will adequately address the risk.

Money laundering and trade controls

All companies, and in particular companies operating across borders, need to plan and protect against the risks of money laundering and exposure to trade sanctions that arise from the flow of funds. Criminals may seek to hide the proceeds of their illegal activity by “laundering” their dirty money through legitimate businesses.

Jumia maintains appropriate policies and procedures to protect against the risks of money laundering and trade sanctions, and will not facilitate or turn a blind eye to illegitimate business or transactions.

We expect our Partners to:

- have appropriate policies and procedures in place to detect and prevent money laundering;
- comply with trade sanctions and restrictions applied against certain states by the international community, including the United Nations, the European Union and the United states; and
- immediately report to Jumia any concerns with regard to money laundering and trade sanctions in connection with Jumia’s business.

Tax evasion

Tax evasion is the illegal practice of not paying taxes, either by failing to report income, falsely reporting expenses, or failing to pay taxes due. Tax evasion and facilitating tax evasion are criminal offences. Jumia recognizes its legal and ethical obligations to pay taxes.

We expect our Partners to:

- maintain financial records and reports of transactions as required by applicable laws;
- have in place all other procedures necessary to ensure tax (including customs) compliance; and
- immediately report to Jumia any concerns regarding tax compliance in connection with Jumia’s business.

Human rights and labour standards

Our mission is to improve the quality of everyday life in Africa, and as part of this we are committed to respecting, promoting and protecting the rights of all people whose lives we touch.

We expect our Partners to follow the guiding principles and commitments of the United Nations³ and the International Labour Organisation (“ILO”)⁴ on safeguarding of human rights and labour standards.

Child labour

All children have a right to access education and we strictly prohibit the employment of young people below the legal working age, subject to exemptions permitted by the ILO or applicable national law. Jumia is committed to the safeguarding of children.

We expect our Partners:

- not to employ any person under the age of 15 and to adhere to all applicable laws and regulations governing the minimum working age; and
- to recognise the interests of young people under the age of 18, including by permitting them to access education and prohibiting employment at night or in hazardous conditions.

Forced labour

Forced labour is any work or service which people are forced to do against their will, under threat of punishment. In addition to being a criminal offence, the exaction of forced labour is a serious violation of fundamental human rights and labour rights. Jumia does not accept the use of forced labour in the delivery of our goods or services.

We expect that our Partners will NOT:

- use of any form of forced, bonded or involuntary labour, including compulsory overtime;
- engage in the practice of requiring workers to lodge “deposits” or identity papers with their employers; or
- impose illegal fines for termination of employment contracts.

Harassment and discrimination

Harassment and discrimination may be based upon a person’s gender, race, religion, national origin, sexual orientation, disability, or other protected characteristic. Jumia is committed to a

³ UN Guiding Principles on Business and Human Rights:

https://www.ohchr.org/documents/publications/GuidingprinciplesBusinesshr_eN.pdf

⁴ The ILO has identified eight fundamental” conventions covering the fundamental principles and rights at work:

<https://www.ilo.org/global/standards/introduction-to-international-labour-standards/conventions-and-recommendations/lang-en/index.htm>



work environment free from harassment and discrimination, which enables people to achieve their full potential and helps our business to thrive.

We expect our Partners to:

- strictly prohibit workplace harassment, including any bullying, or threatening behaviour, be it physical, verbal or psychological; and
- treat employees fairly and not discriminate against employees in any aspect of employment.

Employees rights

Employment laws enshrine fundamental human rights, and are essential for the well being and protection of employees, and the productivity of the workforce. Jumia respects and upholds the legal rights of all of its employees.

We expect our Partners to ensure that their employees:

- are properly paid in accordance with all applicable laws;
- are free to join or form trade unions, and are unrestricted in their right to freedom of association and collective bargaining in accordance with applicable laws and regulations; and
- are not expected to work excessive hours, in accordance with national laws, collective agreements and international labour standards. In any event, working hours, excluding overtime, shall be defined in the work contract, and overtime shall be voluntary and shall not exceed applicable legal limits.

Health, safety and the environment

Our responsibility to look after our environment extends beyond our immediate working environment to our planet, and we are committed to ensuring a safe and healthy environment not only for our employees today, but for future generations.

We expect our Partners to be committed to maintaining a safe working environment for their employees, and also to promote long term environmental sustainability.

Health and safety

Every worker has the right work in a safe environment, and return from work each day, unharmed. Jumia is committed to providing safe and secure offices, warehouses and workplaces for all its employees and contractors.

We expect our Partners to:

- meet all applicable health and safety laws and regulations;
- provide all their employees with a safe working environment, actively managing any industry specific hazards that may prevail, in line with industry best practice; and
- provide employees with adequate first aid, fire safety equipment and exit facilities, and other emergency tools and procedures.

The environment

In a world of scarce natural resources, climate change and fragile habitats and biodiversity, businesses have a heavy responsibility to reduce their environmental impact. Jumia recognises this responsibility and we rely on our Partners to help us to deliver sustainable growth.

We expect our Partners to:

- manage their environmental impact responsibly and in line with applicable laws and regulations;
- strive to use and encourage the development of environmentally friendly technologies, products, and services; and
- continuously act to reduce environmental impact, by identifying, assessing and managing environmental risks and impacts throughout their business operations.

Data privacy and information security

Jumia's information is a valuable and sensitive asset, that must be managed appropriately. Where we have been entrusted with personal data belonging to individuals in particular, we have a heightened responsibility to handle this information respectfully, and in accordance with all applicable laws.

We expect our Partners to put in place appropriate measures to protect and manage our information in accordance with all applicable laws.

Personal data

Data protection legislation across our markets provides for the personal data of individuals to be adequately protected. Furthermore, the European Union's General Data Protection Regulation ("GDPR")⁵ applies in respect of the personal data of individuals in the relevant European countries, wherever that information is held, worldwide.

Jumia handles personal data of consumers, suppliers and employees across the globe, who interact with our platforms and our business, in accordance all applicable laws (including GDPR) and the Jumia Data Privacy Policy.

We expect our Partners:

- to ensure that they obtain consent from individuals to use their personal data for specific purposes, or that there is another legitimate legal basis to handle personal information;
- We expect our Partners to handle sensitive personal data (including information relating to an individual's health, race, ethnic origin, political opinions, etc.) with particular care, and to avoid handling sensitive personal data unless strictly necessary and only in compliance with applicable law; and
- to understand and abide by all their obligations in respect all applicable of data protection laws, including GDPR.

Information security

If confidential business information (including personal data) is shared outside Jumia, it could hurt us competitively, affect our financial results and damage our reputation.

Jumia maintains the appropriate digital and physical security measures required to keep our confidential information safe and secure.

We expect our Partners to:

- only disclose our confidential information if they have written authority from us to do so;

⁵ <https://gdpr-info.eu/>



- have in place the policies and procedures necessary to keep our confidential information secure; and
- report any privacy or security breaches or vulnerabilities.

How are we doing?

Jumia supports its Partners to observe this Partner Code of Conduct, the other Jumia codes policies and guidelines, and all applicable laws.

We may audit (or engage a third-party to audit) compliance with this Partner Code of Conduct, and we expect all Partners to support our audits by providing us with such information, documentation and access to sites as we may require.

We also want to hear from you if you see or hear of any breaches or potential breaches of this Partner Code, in order that we may respond quickly and appropriately. Please report any concerns to regular Jumia business contract, or if you prefer you may contact ComplianceAlert@Jumia.com

Jumia takes all reports of breaches or potential breaches very seriously, and will not tolerate reprisals against any Partners who report their concerns in good faith.

For any questions or further information, please contact your regular Jumia business contact.

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