

COMPLIANCE & CODE OF CONDUCT POLICY

We take great pride in our reputation and are dedicated to upholding corporate integrity and ethical conduct. Compliance with all applicable laws, regulations, and industry standards is fundamental to our business's governance, sustainability, and long-term success.

Our operations are guided by core values that promote responsible, ethical behaviour in every aspect of our work. We are committed to respecting the law, protecting the environment, supporting universal human rights, and conducting all business activities with honesty, accountability, and social responsibility.

STATEMENT

Scope

This Policy, documented procedures, and guidelines are designed to establish a centralised mechanism for tracking and ensuring compliance with all applicable laws in all countries where the company operates.

This Policy does not discriminate at any level and applies *equally* to *all* company associates.

Code of Conduct

Our Code of Conduct is a statement of ethical and compliance principles that guide our daily operations. The Code of Conduct also establishes how we expect management, employees, and agents to act in accordance with law and applicable policies, procedures and guidelines. In brief, all persons who have an association with the company are;

- Prohibited from offering, promising or paying a bribe of any kind.
- Prohibited from soliciting, accepting or receiving a bribe of any kind.
- Prohibited from giving or offering anything of value to a public official.
- Required to comply with the company's guidelines concerning giving and receiving gifts and hospitality.
- Prohibited from making or receiving facilitation payments.
- Required to perform due diligence for agents, representatives, suppliers, contractors, joint venture partners and all those with whom a business relationship is established.

Training

We are committed to communicating our standards, policies, procedures and guidelines to our employees. In addition, we provide education and training to new and current employees on various compliance-related topics.

Responsibility

The Compliance Team shall be responsible for advising and assisting management in implementing appropriate compliance policies and procedures, providing awareness training, assessing and monitoring the company's compliance practices, implementing strategies that reinforce a safe, transparent, and ethical working environment, and ensuring consistent management of policies, standards, and procedures in place.

The responsibility of all employees is to prevent, detect, and report bribery, corruption or non-adherence to documented policies, procedures and guidelines. If you become aware or suspect that an activity or conduct which is proposed or has taken place is a bribe or corrupt, then you must report this.

Violations

Adherence is mandatory, and any violation of this Policy and associated documented procedures may lead to disciplinary action or legal consequences.

Continuous Improvement

Senior management reviews this Policy annually and revises it as necessary to reflect changing operational conditions, new technology, government policies and legislation.