

COMPLIANCE & CODE OF CONDUCT POLICY

We value our reputation and are committed to maintaining the highest corporate and ethical standards in our business affairs. We recognise the essential role that compliance - with applicable regulatory and legal requirements - plays in the governance and sustainability of our business. To this end, we will ensure our business is conducted in accordance with these requirements.

Our foundations are built on core values guiding our actions to ensure all our business transactions are conducted socially, responsibly, and ethically. We respect and follow the law, protect the environment and support universal human rights.

STATEMENT

Scope

This Policy, documented procedures and guidelines are designed to establish a centralised mechanism to track and ensure 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** persons associated with the company.

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 the 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 have responsibility for advising and assisting management in implementing appropriate compliance policies and procedures; awareness training; in 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 prevention, detection and reporting of bribery, corruption or non-adherence to documented policies, procedures and guidelines is the responsibility of all employees. 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 have a duty to report this.

Violations

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

Continuous Improvement

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

ANNUAL APPROVAL OF CORPORATE POLICIES

The Policy was approved by the CEO and Managing Director for release.



Annual Verification Date: 17th June 2022 Verification Stamp:

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