

## Group Code of Conduct/Values

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### 1. Introduction

The Group is committed to being a responsible corporate citizen. The Group interprets its responsibilities as not only requiring it to abide by the laws binding upon it, but also requiring it to conduct its business in accordance with accepted practices and procedures.

The Group believes that these same responsibilities extend to the Group as a whole, the Board and the Group's personnel generally.

### 2. Business Integrity

#### 2.1 Code of Operations

The Group recognises the importance of conducting its operations in a manner consistent with the principles of honesty, integrity and fairness.

Compliance with all relevant laws and regulations binding upon the Group is expected.

#### 2.2 Transparent accountability

The Group recognises the attributes of transparent accountability in the management of the Group's affairs.

#### 2.3 Political Involvement

The Group will not, participate in party politics and must not make payments to political parties.

#### 2.4 Bribes and Corruption

Corrupt practices are not acceptable, irrespective of local standards or practices in the place of business. The Group and its personnel must not, directly or indirectly offer, pay, solicit or accept bribes or any other corrupt arrangements.

#### 2.5 Competition

The Group supports the principles of free and fair competition in the market in compliance with applicable competition and consumer protection laws.

#### 2.6 Privacy and Information

The laws in relation to privacy, and the use of confidential or sensitive information, will be respected by the Group.

#### 2.8 Conflicts of Interest

Conflicts of interest should be avoided.

Where a conflict of interest does arise, full disclosure must be made and all relevant persons must not participate in any related decision-making process.

#### 2.9 Whistleblowing

The Group is committed to fostering an environment where concerns about illegal or unethical behaviour which affect the Group can be reported without fear of punishment.

The Group will treat reports of this kind with the seriousness they deserve and investigate and act on them appropriately and promptly.

### **3. Labour**

#### **3.1 Discrimination**

The Group recognises the dignity of each worker, and the right to a workplace free of harassment, abuse or corporal punishment. Decisions on hiring, salary, benefits, advancement, termination or retirement will be based solely on a worker's ability to do the job. There must be no discrimination based on race, creed, gender, marital or maternity status, religious or political beliefs, age or sexual orientation.

#### **3.2 Forced Labour**

The Group must not use forced labour in any form.

#### **3.3 Child Labour**

The Group recognises the rights of every child to be protected from economic exploitation and from performing any work that is likely to be hazardous or to interfere with the child's education, or to be harmful to the child's health or physical, mental, spiritual, moral or social development.

#### **3.4 Compensation**

The Group will provide each worker with at least the minimum wage, or the prevailing industry wage.

#### **3.5 Benefits**

The Group must provide each worker with all benefits legally required.

#### **3.6 Hours of Work/Overtime**

The Group will comply with legally mandated work hours, and compensate for overtime appropriately.

#### **3.7 Freedom of Association**

The Group recognises the right of all workers to form and join trade unions and to bargain collectively.

### **4. Health and Safety**

A safe and hygienic working environment must be a priority to the Group at all times, and best occupational health and safety practice must be promoted, bearing in mind the prevailing knowledge of the industry and of any specific hazards.

### **5. Environment**

The Group must comply with all applicable environmental laws and regulations.

### **6. Community**

The Group will strive to be a trusted corporate citizen and to operate in a manner which encourages a lasting, beneficial and interactive relationship with the communities in which it operates.

### **7. Contractors**

The Group expects its contractors and principal suppliers to observe comparable standards to those set out in these standards when dealing with the Group.

**8. Compliance**

The Group must maintain sufficient records and evidence to demonstrate compliance with this Code of Conduct.

Internal and external audits in relation to the Group's compliance with this Code may be conducted.