



CODE OF CONDUCT

Abiding by the SAPREF General Business Principles



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MESSAGE FROM THE MANAGING DIRECTOR: The SAPREF Code of Conduct

SAPREF's core values of honesty, integrity and respect for people underpin everything we do and are the foundation of SAPREF's Statement of General Business Principles. We live our lives and conduct our business in accordance with the law and the ethical standards set out in our General Business Principles. SAPREF expects all its employees, contractors, suppliers, customers and authorities to conduct their affairs in accordance with these principles.

Since SAPREF is committed to a policy that requires ethical behaviour from all its employees in all facets of its business at all times, it is SAPREF's stated intent to demonstrate, commit to and entrench a culture of zero-tolerance towards unethical behaviour. Unethical behaviour includes all forms of bribery and corruption and may include the giving and receiving of certain gifts, hospitality, expenses and sponsorships as well as charitable and political contributions. This SAPREF Code of Conduct provides help and guidance to all employees to live up to our beliefs outlined in our Statement of General Business Principles.

SAPREF supports all initiatives to strengthen efforts to counter bribery and corruption by applying high standards of honesty and integrity consistently in all our business dealings. Everyone at SAPREF must follow its requirements. Failure to do so may lead to disciplinary action.

We are committed to providing as much help as possible to enable you to follow the Code of Conduct. We want an open culture where people ask if they are unsure what compliance means in particular circumstances. We also want concerns to be raised, and if you believe the Code has been broken by anyone in SAPREF, you have a responsibility to report it. The Code explains how you can do this, including details of SAPREF's Tip-offs Anonymous Helpline. Retaliation against anyone who speaks up will not be tolerated.

Our reputation and our future success are critically dependent on compliance, not just with the law but with the highest ethical standards. A reputation for integrity is a priceless asset. This Code of Conduct is a further commitment to integrity for all of us and will help us to safeguard that asset.

ROBIN MOOLDIJK
MANAGING DIRECTOR



Explaining the Code of Conduct

1. Why does SAPREF need a Code of Conduct?

The Code of Conduct provides clarity about the standards SAPREF expects its employees to follow and the behaviors they must adopt, not just to make sure we comply with all relevant legislation and regulations, but to make sure we comply with SAPREF's core values of honesty, integrity and respect for people.

2. What is the Code of Conduct?

The Code of Conduct crystallises the basic rules, standards and behaviours necessary to achieve our objectives. It provides requirements and guidance, expressed as clearly, concisely and consistently as is possible, within a single, company-wide document for all our employees across a number of enterprise-wide risk areas.

The Code of Conduct is a common reference point for anyone who is unclear about what is expected of them in a specific situation. It is a definitive statement of SAPREF's response to many different issues and questions and is a valuable toolkit that can help you put our General Business Principles into practice.

3. What does the Code of Conduct cover?

The Code of Conduct covers all the compliance requirements stated in our General Business Principles, only in much greater detail. The specific principle which covers compliance with legal and regulatory requirements underpins all the legal requirements covered in the Code of Conduct. Other principles which relate to particular parts of the Code of Conduct are set out as banner headlines to those parts.

4. How can the Code of Conduct help you and does it explain all the standards you need to know?

The Code of Conduct is the cornerstone of our commitment to integrity. It is a starting point. The Code of Conduct cannot describe every law, regulation or SAPREF requirement that may apply to you, but it provides practical advice on how to comply with laws, regulations and requirements, and guidance about how you should relate to colleagues, customers, shareholders, communities, vendors, competitors and the government. The company has additional standards, instructions and processes to further implement the principles in the Code of Conduct. Make sure you know the rules that apply to you.



Explaining the Code of Conduct

5. Your personal commitment to doing the right thing

This Code of Conduct represents a commitment to doing what is right. By working for SAPREF, you are agreeing to uphold this commitment. Understand the requirements of the Code of Conduct and the standards, instructions and processes that apply to your job – and always follow them. Those who fail to follow the Code of Conduct put themselves, their co-workers, and SAPREF at risk.

6. Where to go to for help

If you do have a question or concern about legal or ethical standards, who should you speak to? As explained below, you have options:

- Your line management
- Human Resources line management
- SAPREF Legal
- Business Ethics Committee
- Internal Audit.

If you prefer, you can use the SAPREF Tip-offs Anonymous Helpline to report a suspected violation by telephone or via the Intranet. Your concerns will be taken seriously and investigated quickly. If you wish, your anonymity will be protected. If a violation of the relevant laws or policies is proven, appropriate action will be taken.

7. What could happen to individuals who violate the Code of Conduct?

Violation of the provisions of the Code of Conduct, or of any laws or regulations governing our operations, may have severe consequences for the individuals concerned and also for SAPREF. A failure to follow the Code of Conduct that involves a criminal act could result in prosecution after referral to the appropriate authorities. Employees who violate the Code of Conduct or any laws or regulations may also be subject to internal disciplinary action, including termination of employment.

8. How can you access the SAPREF Tip-Offs Anonymous Helpline?

The SAPREF Tip-offs Anonymous Helpline is open 24 hours a day, seven days a week through the local telephone number: 0800 204 409 or via e-mail: sapref@tip-offs.com. Individuals calling the Helpline will talk in confidence to an experienced, independent operator. Their reported concerns will be logged and handled in accordance with a consistent investigation process.

9. The SAPREF Business Ethics Committee

SAPREF has established an independent Business Ethics Committee to administer and oversee the function. Making sure the Code of Conduct is followed is the overall responsibility of SAPREF’s leadership and of each individual employee.

The Business Ethics Committee requires the commitment and support of everyone who works for SAPREF – to ensure that the Code of Conduct lives and breathes in everything we do.

The Business Ethics Committee is supported by our directors, shareholders and leadership team to promote a positive, ethical work environment for all employees.





Explaining the Code of Conduct

9.1. The role of the Business Ethics Committee

The Business Ethics Committee:

- 9.1.1. Seeks to raise awareness of unlawful or unethical business conduct;
- 9.1.2. Provides support to help employees comply with the Code of Conduct and applicable laws;
- 9.1.3. Provides and oversees compliance training and communications;
- 9.1.4. Provides assistance with internal investigation processes when necessary;
- 9.1.5. Reviews and promotes consistent disciplinary procedures for breaches of the Code of Conduct and the incorporation of compliance and ethics into performance appraisal processes; and
- 9.1.6. Provides independent reports on compliance performance to the managing director and the leadership team.

9.2. The Business Ethics Team

- » Legal services manager
- » Paralegal
- » Chief internal auditor
- » Communications manager
- » HR representative
- » ICT representative
- » Operations representative
- » Engineering/maintenance representative



1 Competition and Antitrust Laws

SAPREF supports free enterprise and seeks to compete fairly, ethically and within the framework of applicable competition laws. In some countries these laws are known as antitrust laws which promote or protect free and fair competition.

Competition laws prohibit anti-competitive behavior, such as price-fixing conspiracies.

It is vital that everyone at SAPREF understands what these laws mean and complies thereto since it not only applies to SAPREF, but also to our competitors, suppliers and customers.

If you find yourself in a position where you are unsure regarding anti-competition exposure, seek legal advice before discussing prices, customers, suppliers or production intentions with anyone outside of SAPREF.

The most common illegal anti-competition activities include:

- i) Agreements between competitors regarding tender/bid pricing or other terms and conditions of a bid/tender or agreements not to compete for certain bids/tenders;
- ii) Agreements between competitors to reduce production or output; and
- iii) Agreements between competitors about which suppliers or customers they will not deal with.

DON'T X

- Enter into an agreement or understanding, or share information with a competitor about the customers or geographic markets you engage with.
- Discuss with competitors which suppliers, customers or contractors SAPREF will or will not deal with.
- Use size, financial resources, or competitive position to eliminate or prevent competition.
- Discuss sensitive information with contractors or suppliers while in the tender process.

DO

- Make sure there is a legitimate and lawful reason for any discussion with a competitor, supplier or contractor.
- Leave the room, and make sure your departure is noticed, if you are at an industry gathering and somebody starts to discuss competitively sensitive issues.



Competition and Antitrust Laws



The Company engages in joint operations in many segments of its business. Joint operations raise antitrust issues because they involve collaboration by two or more companies, often competitors, in carrying out activities that each company might have carried out separately. This requires strict confidentiality since direct or indirect contact with competitors can have serious legal consequences.

At SAPREF, in gathering competitor intelligence, we use only available literature, industry and other publicly available sources to understand business, customer and supplier directions, technology trends, regulatory proposals and developments. SAPREF will gather this information fairly and legally.

2



Health, Safety, Security and Environment

SAPREF is committed to achieving excellence in all its business activities including health, safety, security and environmental (HSSE) performance. Our aspirations are to operate in environmentally and socially responsible ways and we firmly believe in no accidents, no harm to people and no damage to the environment by complying with all HSSE laws and regulations.

SAPREF aims to provide a safe, secure and healthy working environment for all its employees, contractors and suppliers.

All employees, contractors, customers and suppliers must follow these basic rules:

- i) Take responsibility for ensuring that our products and operations meet the applicable government and company standards;
- ii) Safely handle, transport and arrange for the disposal of raw materials, products and waste in an environmentally responsible manner; and
- iii) Promptly report any breaches of HSSE laws or SAPREF's own HSSE requirements.



DON'T

- Carry out tasks for which you are not trained, competent, medically fit and sufficiently rested and alert.
- Use threats, intimidation or other violence at work, or bring weapons – including those carried for sporting purposes – onto company premises.

DO

- Comply with SAPREF's Life Saving Rules.
- Ensure that employees/contractors are familiar with the laws, regulations, policies and procedures that apply to their job.
- Use the personal protective equipment required for the task you are undertaking.



Health, Safety, Security and Environment



Life Saving Rules – What are they?

<p>1</p> <p>Work with a valid work permit when required.</p>	<p>7</p> <p>Do not walk under a suspended load.</p>
<p>2</p> <p>Conduct gas tests when required.</p>	<p>8</p> <p>Do not smoke outside designated smoking areas.</p>
<p>3</p> <p>Verify isolation before work begins and use the specified life protecting equipment.</p>	<p>9</p> <p>No alcohol or drugs while working or driving.</p>
<p>4</p> <p>Obtain authorisation before entering a confined space.</p>	<p>10</p> <p>While driving, do not use your phone and do not exceed speed limits.</p>
<p>5</p> <p>Obtain authorisation before overriding or disabling safety critical equipment.</p>	<p>11</p> <p>Wear your seat belt.</p>
<p>6</p> <p>Protect yourself against a fall when working at height.</p>	<p>12</p> <p>Follow prescribed Journey Management Plan.</p>

3



Personal and Business Integrity



3.1. Bribery and Corruption

Corruption, the abuse of entrusted power for private gain, is the single greatest obstacle to economic and social development around the world, which is why SAPREF has a clear position on bribery and corruption: SAPREF employees do not offer or accept bribes. The indirect or direct offer, payment, soliciting or acceptance of bribes in any form (including favours) by our employees is unacceptable. SAPREF promotes its policy on bribery and corruption amongst its shareholders, customers, contractors and suppliers.

SAPREF employees must never accept or give a bribe, facilitation payment (bribe offered to “grease” or “speed up” a process), kickback (accepting or giving gifts or anything of value in return for favourable treatment), or any other improper payment for any reason.

Acts or allegations of bribery can do serious harm to our reputation. Any SAPREF employee who is found to be giving or taking bribes or committing any other acts of corruption, will be subject to disciplinary action which may ultimately lead to dismissal and, if appropriate, criminal proceedings.

DON'T

- Offer, accept, solicit or pay bribes or make facilitation payments.
- Engage in bribery to gain favours.
- Abuse the position held in the company for furthering personal motives.
- Make improper payments through third parties. SAPREF employees must therefore be diligent in selecting and monitoring contractors and customers.

DO

- Avoid all temptation to pursue personal gain when doing SAPREF business.
- Use caution when giving or receiving gifts or entertainment to or from government officials or other business contacts.
- Ensure that all business dealings are conducted with integrity and with SAPREF’s reputation and honesty foremost.
- Report any concerns you may have about corrupt activities, either within the company or in dealings with third parties, to your line manager or a member of the Business Ethics Committee or through the SAPREF Tip-offs Anonymous Helpline.
- Report any request for an improper payment, or any indication that a person might be making corrupt payments, or that a person has an inclination or plan to violate anti-bribery laws immediately to a member of the Business Ethics Committee and to SAPREF Legal.



Personal and Business Integrity

3.2. Dealing with our Government

If you have contact with government officials during your work, or are asked to provide information in connection with a government or regulatory agency enquiry or investigation, you must make sure that any information you provide is truthful and accurate, and that SAPREF's legitimate interests are protected.

Always seek advice from SAPREF Legal and your line manager (who may consult the sustainable development team) before responding to a non-routine request for information from a government or regulatory agency.

Bribery of government officials is a serious matter and is also illegal and against SAPREF's own standards of business conduct.

SAPREF is committed to contributing to the well-being of the communities within which we work. As part of that commitment, we may make contributions to local charities or commitments to local social investment programmes. However it is unacceptable to make a charitable contribution in order to secure an improper advantage or to influence any government official.

Before any charitable contribution may be made, SAPREF employees should undertake reasonable efforts to determine whether any government officials are affiliated with the proposed recipients.



3.3. Political Activity and Payments

SAPREF has the right and the responsibility to make their position known on any matters which affect us, our employees, our customers, our shareholders or local communities in a manner which is in accordance with our values and the SAPREF Statement of General Business Principles.



3.3.1. Corporate Political Activity

SAPREF's approach to corporate political participation is very simple and applies everywhere we do business:

- 3.3.1.1. The company will not participate directly in party political activity; and
- 3.3.1.2. The company will make no political contributions, whether in cash or kind.

3.3.2. Personal Political Activity

SAPREF recognises employees' rights to participate as individuals in the political process in ways that are appropriate to their country. However, you must be careful to make clear that you do not represent the company as you participate in the political process.

DON'T



- Make any contributions or incur expenditure using SAPREF's account for any political campaign, party, candidate, or any of their affiliated organisations.
- Use charitable donations as a substitute for a political payment.
- Offer or make any unauthorised payment or authorise improper payments to a government official.
- Mislead any investigator or other government regulatory official and don't attempt to hinder any investigation processes.



DO

- Make sure that records and information relevant to any government or regulatory agency enquiry or litigation are preserved.
- If a request is non-routine, notify and seek advice from SAPREF Legal and your line manager before responding.
- When engaging with government officials, bear in mind SAPREF's reputation and how the public would perceive your actions.
- Co-operate courteously with officials conducting a government or regulatory agency enquiry or investigation.

DON'T



- Use your position in SAPREF to try to influence any other person (inside or outside SAPREF) to make political contributions or provide support to any political parties or politicians.



DO

- Become familiar with all laws and regulations that restrict any company's involvement in political activities, including your engagement in lobbying for SAPREF to promote its legitimate concerns.
- Make clear that you are speaking on your own account and not on behalf of SAPREF when you engage in personal political activity.



Personal and Business Integrity

3.4. Gifts and Entertainment

As a general principle SAPREF discourages employees from accepting gifts or entertainment from customers, contractors and suppliers as they can sometimes be seen as bribes.

SAPREF also discourages expenditure on gifts, travel, lodging or entertainment for any government official which may be made for the purpose of influencing any official action or to procure any improper advantage.

SAPREF recognises that the occasional acceptance or offer of modest gifts and entertainment may be a legitimate contribution to good business relationships. However gifts and entertainment must never influence business decision making processes.

All employees, contractors and suppliers should adhere to SAPREF's Gifts and Entertainment Policy.



3.5. Conflicts of Interest

SAPREF respects its employees' right to privacy in their personal affairs and activities, however it is possible that an employee's personal or family activities may raise an actual or potential conflict with their duty to SAPREF.

3.5.1. Defining a Conflict of Interest

3.5.1.1. A conflict of interest may arise where an employee or an employee's spouse, child or close family member (such as a parent or sibling) has outside employment, financial or other participation, for example as an employee, director or consultant in any business which is a contractor, supplier or competitor of SAPREF or is seeking to become one.

3.5.1.2. Examples of conflicts of interest include having a second job, performing services, serving as a director or consultant, or holding a financial interest.

Employees should disclose any personal interest or circumstances which may affect their impartiality in any matter relevant to their duties to their line manager or a member of the Business Ethics Committee. Any further advice should be obtained from the Legal or Finance Departments to help determine a conflict of interest.

DON'T



- Accept entertainment, free holidays, or any hand-outs as a thank you.
- Accept gifts or entertainment involving parties that are engaged in a tender or competitive bidding process.
- Accept any gift of cash or cash equivalent (such as loans or shares).
- Accept any gift or entertainment that is "quid pro quo" (offered for something in return).
- Accept any entertainment that is indecent, sexually orientated or does not comply with SAPREF's commitment to mutual respect.

DO

- Always consult with your line manager if you are offered a gift of any sort or any form of entertainment.
- Take into consideration the SAPREF policy expectations.
- Use sensible judgment in deciding what is reasonable.
- Understand local customs for the giving or receiving of gifts, entertainment or benefits, tips and fees.
- Gifts that can be accepted should not exceed the value of R350; this includes corporate gifts (diaries, pens, etc.) and gifts received during festive seasons of the year, i.e. Eid, Diwali, Christmas, New Year, Hanukkah.

DON'T



- Get involved in the hiring, supervision, management or career planning of any relative or in the financial controlling and auditing or human resources discussions regarding any relative.
- Make improper use of your position in SAPREF, or of confidential information you have gained, to achieve personal interest or indirect gain.
- Allow your relationships with contractors and suppliers to influence business decisions made on behalf of SAPREF.
- Accept free travel and accommodation arrangements from a SAPREF supplier.

DO

- Declare any conflict of interest to senior management. You should not pursue your own interests at SAPREF's expense.
- Make sure there is no vested interest between you, the contractor or company you are doing business with.
- Conduct your relationships with contractors and suppliers in a professional, impartial and competitive manner.
- Seek guidance from your line manager or a member of the Business Ethics Committee if you have doubts.
- Ask yourself the question: Would I feel comfortable explaining any actions to my work colleagues or the media?



Personal and Business Integrity

3.6. Working with Suppliers

SAPREF's suppliers play a critically important role in our ability to operate and provide services and products. That is why SAPREF chooses suppliers carefully, based on objective evaluation criteria, and with the expectation that our suppliers will act consistently with our compliance and ethics requirements.

- 3.6.1. Basic rules to follow in selecting or working with suppliers:
 - 3.6.1.1. Choose suppliers based on merit, avoiding conflicts of interest, inappropriate gifts and entertainment or any other kind of favouritism;
 - 3.6.1.2. Seek to do business with suppliers who comply with legal requirements;
 - 3.6.1.3. Report to line management any activity by suppliers that is inconsistent with SAPREF's compliance and ethics requirements; and
 - 3.6.1.4. Do not give one supplier's confidential business information (proposed rates, winning bid information, etc.) to another supplier.



DON'T ❌

- Engage in any dealings involving a company outside SAPREF while you have inside information or confidential information about that company.

DO ✅

- Follow SAPREF's procedures for procurement of services and materials and reflect equality of treatment for tenderers.
- Be law abiding both inside and outside of working hours.

3.7. Money Laundering

- 3.7.1. Money laundering is the process by which individuals or entities try to conceal illicit funds, or otherwise make these funds look legitimate. SAPREF will not condone, facilitate or support money laundering.
- 3.7.2. Few SAPREF employees will ever personally be in the position to infringe "money laundering" laws, but there are two areas which we all need to watch out for:



- 3.7.2.1. Customers who appear to lack integrity in their operations.
- 3.7.2.2. Payment irregularities.
 - 3.7.2.2.1 SAPREF supports anti-money laundering policies by using procedures to avoid receipt of cash or cash equivalents that are the proceeds of crime.

BE WARY OF ❌

- Payments made in currencies other than specified in the invoice.
- Attempts to make payments in cash or cash equivalents.
- Payments made by someone not a party to the contract.
- Payments to/from an account other than the normal business relationship account.
- Requests or attempts to make payments for each invoice or group of invoices by multiple cheques.
- Requests to make overpayments.

ALWAYS ✅

- Assess the integrity of potential contractors and suppliers.
- Communicate with contractors about our compliance expectations of them.
- Continue to be aware of and monitor contractors' business practices.
- Do not do business with any contractor or supplier suspected of wrongdoing relating to dealings with us unless those suspicions are investigated and resolved or approved by SAPREF Legal.

4



Company Assets and Financial Integrity

4.1. Protection of Corporate Assets

4.1.1. Company Assets

- 4.1.1.1. All employees are responsible for protecting SAPREF's assets against waste, loss, damage, misuse, theft, misappropriation or infringement.
- 4.1.1.2. You also have a duty of care to report the abuse of SAPREF property by others.

4.1.2. Asset and Expense Records

- 4.1.2.1. Accurate, reliable and timely preparations of business records and documents, and invoices, including those that relate to expenses incurred on behalf of SAPREF, are required by law.
- 4.1.2.2. Falsification or misinterpretation of facts may constitute to fraud and can result in civil and criminal liability.

4.1.3. Company Time

- 4.1.3.1. Whilst at the workplace, employees are expected to be fully engaged in their work and not undertake any personal activity beyond a reasonably modest level.
- 4.1.3.2. Those required to report their hours worked must do so truthfully and accurately.
- 4.1.3.3. Devote the necessary time to fulfill your job responsibilities.



DON'T

- Conceal, alter, destroy or modify company records or documents except as authorised in accordance with established standards and guidelines.
- Deliberately make a false or misleading entry in a report, record or expense claim.
- Falsify any record, whether financial or non-financial.
- Sell, transfer or dispose of company assets without proper authorised documentation.
- Try to influence others to do anything that would compromise the integrity of SAPREF's financial records or reports.

DO

- Ensure that all transactions are properly authorised and accurately and completely recorded.
- Use SAPREF's assets only to accomplish its business purposes.
- Take care to prevent waste, loss, damage, misuse, theft, misappropriation or infringement of SAPREF's assets.
- Record time worked accurately.
- Follow established guidelines and procedures in respect of authorities and approvals for dealings with third parties that involve SAPREF's assets.



Company Assets and Financial Integrity

4.2. Intellectual Property (IP)

- 4.2.1 SAPREF employees must always give proper attention to protecting SAPREF's intellectual property and never disclose SAPREF's intellectual property or other confidential information.
- 4.2.2. Intellectual Property includes:
- 4.2.2.1. Patent rights;
 - 4.2.2.2. Copyrights (including software bought or developed by SAPREF);
 - 4.2.2.3. Trademarks and service marks;
 - 4.2.2.4. Design rights;
 - 4.2.2.5. Database extraction rights;
 - 4.2.2.6. Rights in know-how or other confidential information (sometimes called "trade secrets" or "proprietary information"); and
 - 4.2.2.7. Rights under IP related agreements.
- 4.2.3. Just as SAPREF protects its own business information, SAPREF is committed to respecting the intellectual and protected information of others.



DON'T

- Initiate a discussion with a third party for any agreement with respect to IP without first consulting SAPREF Legal.
- Disclose proprietary information in a public forum without clearance under the procedures in place for the relevant business.
- Register any domain name without SAPREF Legal involvement.
- Adopt a new trademark without clearance from SAPREF Legal.

DO

- Ensure that you know the IP strategy of SAPREF and act in accordance with this.
- Consult with SAPREF Legal before receiving, disclosing or agreeing to receive or disclose information provided in confidence.
- Ensure that all employees and contract staff have written contracts addressing their obligations.
- Use trademarks and domain names only in accordance with SAPREF policy.



Company Assets and Financial Integrity

4.3. Personal Use of IT and Communications

- 4.3.1. SAPREF expects that all employees using SAPREF IT and communication facilities for personal reasons will apply high ethical standards, comply with the applicable laws and regulations, and support SAPREF information security requirements.
- 4.3.2. Pornographic and gambling websites are used to spread viruses. Unauthorised installation of software may also endanger information security.
- 4.3.3. Never use SAPREF facilities to visit inappropriate sites or install software.



DON'T



- Bring to SAPREF or use any confidential information including computer records from prior employers.
- Upload any unlicensed software on any SAPREF computer.
- Upload or download, transmit or otherwise access pornography or any other form of nude, indecent, vulgar, obscene or otherwise objectionable material.
- Use SAPREF IT and communication facilities in a way that could damage SAPREF.



DO

- Make sure your computer is protected by anti-virus software and a personal firewall, and that your software is up to date, especially when it is connected to the internet.
- Make sure you remain in control if and when others use your IT and communication facilities.
- Avoid using an internet service provider (ISP) based in another country.
- Ensure that your passwords are not disclosed to anyone as they provide the main defence against unauthorised access.



People

5.1. Equal Opportunity

- 5.1.1. SAPREF aspires to create a work environment of mutual trust and respect, in which diversity and inclusion are valued.
- 5.1.2. SAPREF will ensure that employment related decisions are based on relevant qualifications, merit, performance, and other job related factors.

5.2. Harassment

- 5.2.1. SAPREF will not tolerate any form of abuse or harassment in the workplace that is humiliating, intimidating or hostile toward employees, contractors, suppliers, customers or others.
- 5.2.2. The effects of harassment for the individual who harasses or abuses are serious and may include disciplinary action, up to and including dismissal and potential legal action.

5.3. Substance Abuse

- 5.3.1. SAPREF is committed to providing a safe and productive environment for its employees, contractors, suppliers and customers. This means striving to ensure that the workplace is free from any substance abuse, that is the use of illegal drugs, misuse of legal drugs or other substances, and abuse of alcohol.
- 5.3.2. The following standards of behaviour are required by all employees and contractors:
 - 5.3.2.1. People should be fit and ready to carry out their work duties at all times while at work or on SAPREF business;
 - 5.3.2.2. People are prohibited from being at work or on SAPREF business while impaired by drugs or alcohol or with illegal drugs present in their systems;
 - 5.3.2.3. The use, possession, sale or distribution of illegal drugs and the misuse of legal drugs or other substances is prohibited; and
 - 5.3.2.4. Alcohol consumption is not permitted during working hours on any SAPREF sites. SAPREF has been designated as alcohol-free at all times.



People



DON'T



- Tolerate any discrimination of any kind.
- Behave in an unwelcome, humiliating manner.
- Distribute or display offensive material or make inappropriate jokes.
- Use, keep, sell or distribute drugs or misuse legal drugs or other substances.
- Ignore a case of substance abuse if you witness one.



DO

- Treat all employees, contractors, suppliers, customers and visitors with respect.
- Create a work environment free from harassment.
- Use a formal grievance procedure if the matter is serious or an informal approach was unsuccessful.
- Report to work fit and ready to carry out assigned duties.
- Advise your line manager if you are under any current medication.



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CODE OF CONDUCT ABIDING BY THE SAPREF GENERAL BUSINESS PRINCIPLES