



HULAMIN

CODE OF CONDUCT FOR SUPPLIERS AND SERVICE PROVIDERS (collectively, the "SUPPLIER")

1. Unless otherwise required or prohibited by applicable laws, the Supplier warrants, to the best of its knowledge that in relation to the performance of its obligations to Hulamin Limited and or any subsidiaries of Hulamin Limited, hereafter referred to as Hulamin:
 - 1.1. it does not employ, engage or otherwise use any child labour;
 - 1.2. it does not use forced labour in any form (prison, indentured, bonded or otherwise) and its employees are not required to lodge deposits on starting work;
 - 1.3. it provides a safe and healthy workplace, presenting no hazards to its employees. Any housing provided by the Supplier to its employees is safe for habitation. The Supplier provides access to proper sanitation, clean water, food, and emergency healthcare to its employees in the event of accidents or incidents at the Supplier's workplace;
 - 1.4. it does not discriminate against any employees on any ground (including race, sexual orientation, religion, disability or gender);
 - 1.5. it does not engage in or support the use of corporal punishment, mental, physical, sexual or verbal abuse and does not use cruel or abusive disciplinary practices in the workplace;
 - 1.6. it pays each employee at least the statutory minimum wage, or a fair representation of the prevailing industry wage, (whichever is the higher) and provides each employee with all legally mandated benefits;
 - 1.7. it complies with the laws on working hours and employment rights in the countries in which it operates;
 - 1.8. it is respectful of its employees right to join and form independent trade unions and freedom of association.

2. The Supplier agrees that it is responsible for controlling its own supply chain and that it shall encourage compliance with ethical standards and human rights by any subsequent supplier of goods and services that are used by the Supplier when performing its obligations to Hulamin.

3. The Supplier:
 - 3.1. agrees that it is responsible for conducting its business in compliance with applicable environmental laws and regulations when performing its obligations to Hulamin Limited; and
 - 3.2. shall ensure that:
 - 3.2.1. it conducts its business in an environmentally conscious manner and insofar as is feasible from renewable resources; and
 - 3.2.2. it minimizes the resources used and waste generated by it.

4. The Supplier shall ensure that it has ethical and human rights policies and an appropriate complaints procedure to deal with any breaches of such policies. In the case of any complaints, the Supplier shall report the alleged complaint and proposed remedy to Hulamin.
5. The Supplier will not, directly or indirectly, make any payment, offer or promise to make any payment or transfer of anything of value to:
 - 5.1. any government official, or to any political party or any candidate for political office, with the purpose of influencing decisions favourable to the Supplier and/or its business in contravention of applicable laws; and/or
 - 5.2. any employee of Hulamin, other than *bona fide* gifts which individually or cumulatively do not exceed the value of R500,00 (Five Hundred South African Rands).
 - 5.3. any employee of Hulamin while engaged with Hulamin in commercial negotiations concerning the supply of any goods or services to Hulamin.
6. The Supplier will not, directly or indirectly, undertake any act or omission, whether alone or together with any other person or entity, which may contravene any applicable competition/anti-trust legislation, regulations and/or rules.
7. To the extent to which the Supplier undertakes its business activities in the Republic of South Africa, it shall comply with Broad-Based Black Economic Empowerment ("BBBEE") legislation and policies.
8. To the extent that any Supplier undertakes its business activities in or may be required to perform any on site function in the Republic of South Africa it shall do so in compliance with the conditions of the **Occupational Health and Safety Act**, No. 181 Of 1993 as amended from time to time.