

## ETHICS & CODE OF CONDUCT POLICY

The Company is committed to encouraging and maintaining good employee relations which fosters and contributes to a workplace environment in which individuals feel safe and can work effectively competently and confidently.

All employees and those who have dealings with the Company have a responsibility to maintain good working relationships. Harassment in any form, not limited to disability, gender, marital status, sexual orientation, age, creed, colour or ethnic origin will not be tolerated. ***Everyone has the right to be treated with consideration, fairness, dignity and respect!***

Furthermore, the Company will not enter into any business dealings with any person or Company which fails to uphold the human rights of its workers or who breach the human rights of those affected by the Company's activities.

### STATEMENT

#### Scope

This Policy forms a statement of the principles that guide our daily operations and establishes how we expect management, employees, service providers, clients, visitors and Company representatives to act in accordance with the law and applicable Company policies, procedures and guidelines.

This Policy does not discriminate at any level and applies ***equally*** to ***all*** persons who have an association with the Company.

#### Equal Opportunities

The Company is fully committed to ensuring equal opportunity and fairness for all people regardless of race, religion and belief, social origin, gender, physical disability, age, or sexual orientation with regards to hiring, promotion, professional training, employment and working conditions, as well as social protection.

#### Human Rights

The Company is strongly opposed to the use of slavery in all forms; cruel, inhumane or degrading punishments; and any attempt to control or reduce freedom of thought, conscience and religion.

#### Workers' Rights

The Company is committed to complying with all employment legislation.

#### Harassment and Bullying

The Company recognises that all employees have a right to work in an environment in which the dignity of individuals is respected and which is free from harassment and bullying and is committed to eliminating intimidation in any form!

#### Conflicts of Interest

The Company holds as fundamental to its success the trust and confidence of those with whom it deals, including clients, suppliers and employees.

#### Responsibility

Company management and Masters are responsible for ensuring that the standards set forth by this Policy and documented guidelines and procedures are communicated to all employees and that their own conduct sets a good example in this respect.

Everyone carries a personal responsibility for their own behaviour and for ensuring that their conduct is in accordance with communicated principles. In addition, each person has a responsibility to report any instance of bullying or harassment which they witness or which comes to their attention.

Under no circumstances shall any form of retaliation be accepted against any employee who, in good faith, makes any complaint against any other person or persons regarding discrimination or harassment.

#### Violations

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

Any service providers, clients or visitors failing to co-operate with the Company in this regard may result in the removal from Company premises and denial of future entry.

#### Continuous Improvement

This Policy is reviewed annually by Senior Management and revised as necessary to reflect changing operational conditions, new technology, government policies and legislation.

This Policy was approved by the CEO and Managing Director on 03.06.2019.

Signed Policies are available upon request.