



**AFRICAN CHEMICALS**

impossible is potential

# ETHICS POLICY STATEMENT





## ETHICS POLICY

African Chemicals(Pty)Ltd Ethics Policy reflects the high standard of business conduct representing what is the hallmark of our organization. Our Ethics Policy helps define our commitment to support a culture of openness, trust and integrity in all we do.

We are committed to conducting all of the African Chemicals(Pty)Ltd.'s affairs and activities with the highest standards of ethical conduct. All of us have an obligation to adhere to this policy and encourage others to do the same.

As a Business and staff, we are passionate about working with all of our customers. We must dedicate ourselves to pursuing our mission with honesty, fairness and respect for the individual, ever mindful that there is no "right way" to do the "wrong thing."

The Ethics Policy helps clarify our standard of conduct. It makes clear that African Chemicals(Pty)Ltd. expects Shareholders, Executives and employees to understand the ethical considerations associated with their actions. Our Ethics Policy affirms our long standing commitment to not merely obey the law, but also to conduct our business with integrity and without deception.

African Chemicals(Pty)Ltd.'s reputation for integrity and honesty is more important today than ever before. As we think of "what we do" at African Chemicals(Pty)Ltd. and "how we do it," always remember our responsibility to ask ourselves: "Am I doing the 'right thing' for the 'right reason'?"

### Code of Ethics

The summary code of ethics includes the following provisions:

African Chemicals(Pty)Ltd. Shareholders, Executives and employees must:

- Proactively promote ethical behaviour as a responsible partner among peers in the work environment.
- Deal fairly with AC Customers, suppliers, competitors, volunteers, and employees.
- Provide constituents with information that is accurate, completely objective, relevant, timely, and understandable.
- Comply with applicable government laws, rules and regulations.
- Maintain the confidentiality of information entrusted to them by the AC or its Customers except when authorized or otherwise legally obligated to disclose.
- Accept responsibility for preventing, detecting, and reporting all manner of fraud.
- Be honest and ethical in their conduct, including ethical handling of actual or apparent conflicts of interest between personal and professional relationships.
- Protect and ensure the proper use of company assets.

- Prohibit improper or fraudulent influence over the External Auditor.

The purpose for this ethics policy is to support a culture of openness, trust, and integrity in all African Chemicals(Pty)Ltd. management and business practices. A well understood ethics policy requires the participation and support of every AC Executives and employees.

At African Chemicals(Pty)Ltd., we are dedicated to working with our executives, employees, partners, vendors and customers to reduce disability and death from cardiovascular diseases and stroke. We are committed to conducting all of the AC's affairs and activities with the highest standards of ethical conduct. The AC Code of Conduct in the Human Resources Policy Manual provides guidance for decisions and actions during our daily work.

We are committed to the responsible use of AC assets; to provide accurate, complete and objective information; to respect the confidentiality of financial and other information; to act in good faith and exercise due care in all we do; to comply with all rules and regulations, and to proactively promote ethical behaviour.

The AC's Ethics are built on the AC's Guiding Values. As such, we acknowledge our individual responsibility to ensure our collective success by practicing and promoting the following values which reflect a shared view of how we want to operate and be seen by others.

### **Our Values**

- Improving and Extending People's Lives
- Bringing Science to Life
- Speaking with a Trustworthy Voice
- Building Powerful Partnerships
- Inspiring Passionate Commitment
- Meeting People Where They Are
- Making an Extraordinary Impact
- Ensuring Equitable Health for All

### **Our People**

The AC is committed to provide a work environment that values diversity among its volunteers and employees. All Human Resource policies and activities are intended to create a respectful workplace where every individual has the opportunity to reach their highest potential.

Employees are provided opportunities regardless of race, colour, national origin, religion, sex, sexual orientation, marital status, age, veteran status or disability. These policies apply to both applicants and employees in all phases of employment including, recruiting, hiring, placement, training, development, transfer, promotion, demotion, performance reviews, compensation, benefits and separation from employment.

We will evaluate how we are living up to our code of ethics by requesting feedback on a regular basis from our employees, volunteers and customers. We will provide all of our stakeholders a mechanism to

report unethical conduct. We will begin with employee orientation and regularly communicate all of these expectations to employees and volunteers.

AC volunteers, employees, contractors and suppliers are expected to report any practices or actions believed to be inappropriate to their supervisor, another AC leader, the Human Resources department, or via the AC ethics hotline.

## **Our Customers**

We are dedicated to 100% customer satisfaction. We are devoted to developing “customer enthusiasm” and are passionate about exceeding customer expectations. We dedicate ourselves to anticipating the changing needs of customers and creating timely, innovative and superior programs, products and services.

## **Fraud**

Fraud is defined as any intentional act or omission designed to deceive others, resulting in the victim suffering a loss and/or the perpetrator achieving a gain. The AC Board of Directors and Senior Management have adopted a “no fraud tolerance” attitude. In addition to the Board, volunteers, management and staff at all levels of the Association have responsibility for preventing, detecting and reporting fraud.

In addition to the definition of fraud set out above, this policy covers any dishonest or fraudulent act, including but not limited to:

- Misappropriation of funds, securities, supplies or other assets.
- Impropriety in the handling or reporting of money or financial transactions.
- Profiteering as a result of insider knowledge of company plans or activities.
- Disclosing confidential and proprietary information to outside parties.
- Intentional, false representation or concealment of a material fact for the purpose of inducing another to act upon it to procure an advantage, benefit or gain.
- Accepting or seeking anything of material value from contractors, vendors or persons providing services/materials to AC, unless pursuant to the Acceptance of Gifts Policy.
- Destruction, removal, or unauthorized use of records, furniture, fixtures, and equipment.
- Any similar or related irregularity.

Each member of management will be familiar with the types of improprieties that might occur within his or her area of responsibility and be alert for any indication of irregularity. An employee, volunteer, consultant, vendor, contractor, or outside agency doing business with AC shall immediately report any irregularity that is detected or suspected, as instructed below under ‘Reporting Ethics Violations.’ Any employee or person who suspects or reports dishonest or fraudulent activity shall not attempt to personally conduct investigations or interviews related to any suspected fraudulent act. Investigations will be coordinated with the Legal Department and other affected groups, both internal and external. For additional information regarding fraudulent activities, refer to the AC Fraud Risk Management Program.

## Conflict of Interest

### Association's Property and Information

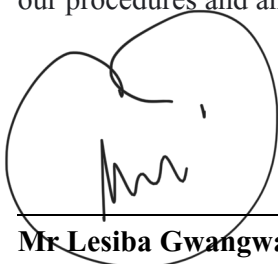
Employees and volunteers are expected to protect the AC's property at all times; including cash, equipment, records, employee, and customer information. This also requires employees and volunteers to maintain confidentiality regarding AHA records, and employee and customer information.

### Non-discrimination Policy

It is AC policy that the executive and staff structures and all programs and activities of African Chemicals(Pty)Ltd., its Affiliates and components shall be designed and conducted without regard to race, religion, national origin, sex, age, disability or other non-merit criteria.

## Reporting Violations

If you have questions or concerns about compliance with any of the policies listed above, or are unsure about what is the "right thing" to do, we **strongly encourage** you to first talk with your supervisor, program leader, another AC Leader or the Human Resources department. If for any reason you are uncomfortable talking to any of these individuals, contact the **AC ethics hotline at 010-035-4248** or [www.africhemicals.co.za](http://www.africhemicals.co.za) ([link opens in new window](#)) to report your concerns. Your calls will be handled in confidence. No director, trustee, officer or employee who in good faith reports an action or suspected action taken by or within the AC that is illegal, fraudulent, or in violation of any adopted policy will suffer intimidation, harassment, discrimination or other retaliation. The AHA treats complaints about and reports of possible discrimination seriously and investigates them as required by our procedures and any applicable laws.



**Mr Lesiba Gwangwa**

**Chief Executive Officer**

