



ADMINISTRATIVE POLICY

PROCESS: LEADERSHIP

DOCUMENT

AP022

PROCESS OWNER: PLANT OPERATIONS OFFICER

ISSUE

1

SUBJECT: **BUSINESS ETHICS POLICY**

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DATE

05.05.2021

INTRODUCTION

S&N Rubber is committed to conducting business to high ethical standards and in full compliance with all applicable legislation.

This policy is to provide guidelines for the company and all employees and conduct business with integrity, creating a good culture based on trust and transparency.

POLICY

1. CORRUPTION, EXTORTION AND BRIBERY

Corruption - dishonest or fraudulent conduct by those in power, typically involving bribery, for private gain

Extortion - the practice of obtaining something, especially money, through force or threats

Bribery - dishonestly persuade (someone) to act in one's favour by a gift of money or other inducement.

S&N Rubber will not tolerate corrupt practices and will act against such practices.

Examples: facilitation payments, bribes, kickbacks, extortion, improper donations, improper benefits to customers or from suppliers, officials or third parties.

Employees and their families may not give gifts to, or receive gifts from, S&N Rubber's current and prospective customers, suppliers or other stakeholders without prior approval from the Plant Operations Officer or General Manager.

Note: Calenders, diaries, note books are acceptable gifts which must be collected by the General Manager and distributed at the start of the new year.

Reference: AP 017 (1) Anti-bribery and anti-corruption policy

2. PRIVACY

The state of being free from public scrutiny or from having your secrets or personal information shared

S&N Rubber respects the privacy of employees and stakeholders insofar as it does not have a negative effect on the employee's work performance or S&N Rubber's reputation.

3. DISCLOSURE OF INFORMATION AND INTELLECTUAL PROPERTY

Intangible property that is the result of creativity e.g. Copyrights, Patents, Trademarks, and Trade Secrets

S&N Rubber, customer, supplier or stakeholder confidential or proprietary information and intellectual property must remain confidential and may not be used or revealed to a third-party, unless specifically authorized or disclosure is legally required.

Appropriate steps must be taken to prevent unauthorized access to such information e.g. limiting access to computers and electronic media, proper disposal of records.

Reference: S&N Rubber's Electronic Communications policy personnel contracts

4. FINANCIAL RESPONSIBILITY AND ACCURATE RECORDS

S&N Rubber shall maintain honest and accurate financial records in reasonable detail and comply with applicable legal requirements. The financial records shall be audited annually.



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Management system and company records must be honestly and accurately maintained. Falsification of any records is prohibited. Mistakes may not be covered up and any errors, or suspected errors, must be reported to supervisory personnel immediately

5. FAIR COMPETITION AND ANTI-TRUST

Free market in which all the players operate on a level playing field; competitive practices on price, quality and customer service; protect consumers from predatory business practices and ensure fair competition

S&N Rubber shall comply with applicable antitrust and fair competition legislation to compete honestly and fairly, with competitive pricing based on company sustainability, product quality and customer service.

6. CONFLICTS OF INTEREST

S&N Rubber personnel shall make decisions based solely on objective information and shall not be influenced by financial or personal interests or relationships.

Any financial or personal interests or relationships that may be a conflict of interest must be reported to the relevant manager.

7. COUNTERFEIT PARTS

S&N Rubber shall not use customer-owned moulds to manufacture counterfeit parts or parts for other customers.

Parts from a customer-owned moulds may only be supplied to another customer where the customer authorized such supply.

8. EXPORT CONTROLS AND ECONOMIC SANCTIONS

S&N Rubber shall comply with all applicable legislation for import and export of goods, and sanctions lists.

9. WHISTLE-BLOWING AND PROTECTION AGAINST RETALIATION

S&N Rubber shall investigate all incidents where employees, current and former, report suspected or real malpractice as well as suspected or real illegal acts and omissions at S&N Rubber.

Reference: AP 018 (1) Ethics escalation, Whistle-blower protection policy

10. RESPONSIBLE RAW MATERIAL SUPPLY CHAINS

S&N Rubber shall endeavour to use raw materials from suppliers that source raw materials sustainably.

S&N Rubber shall require suppliers to comply with their due diligence obligations regarding raw material sourcing and supply and to enhance transparency through the supply chain.

S&N Rubber shall require suppliers to extend their due diligence to the sustainability requirements for environmental protection, human rights and employee labour rights, transparent business relations and fair market behaviour

INITIATOR: QUALITY MANAGER	REVIEWED: GENERAL MANAGER	APPROVED: PLANT OPS OFFICER
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REASON: Issue 1: To define and document the policy for defining the S&N Rubber Business Ethics Policy