KPM | Petroleum & Logistics

"Fueling industrial success"

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SUPPLIER CODE OF CONDUCT

KPM Petroleum & Logistics (Pty) Ltd maintains the highest ethical standards in its business activities and expects the same from its Suppliers [1]. Acting ethically requires, but is not limited to, complying with all applicable laws and regulations and conducting business with respect for principles of basic human rights and decency when interacting with both colleagues and external parties.

The KPM Petroleum & Logistics (Pty) Ltd. Supplier Code of Conduct (Supplier Code) sets forth minimum expectations for Supplier conduct performing work, for or on behalf of KPM Petroleum & Logistics (Pty) Ltd. Failure to adhere to the standards of this Supplier Code, may reflect negatively on a Supplier's relationship with KPM Petroleum & Logistics (Pty) Ltd and will be considered in future business determinations.

For further information, questions or concerns about the Supplier Code, contact
KPM Petroleum & Logistics (Pty) Ltd Procurement.

[1] Suppliers means any party, including contractors and consultants, who supply goods or services to KPM Petroleum & Logistics (Pty) Ltd or to another party on behalf of KPM Petroleum & Logistics (Pty) Ltd

Respect

Employment Practices: Suppliers must comply with all applicable employment laws, regulations, and standards in relation to labor practices and human rights. Suppliers are expected to pay fair wages, observe reasonable and safe working hours, including overtime, and offer medical insurance, to the extent required by law. All work should be voluntary, and employment obligations under country and industry laws and regulations should be strictly adhered to.

Fair Treatment: Suppliers must treat all employees and contractors fairly, operating with dignity, respect, and integrity. Suppliers must not discriminate, harass, intimidate, threaten, humiliate, or abuse their employees. Retaliation is also strictly prohibited.

Child and Forced Labor: Suppliers will not use, employ, or seek to exploit in anyway the services of child, under-aged, or slave or trafficked labor. This includes any form of indentured servitude, such as use of physical punishment, confinement, and threats of violence as a method of discipline. In addition, other than as is permissible by law, Suppliers should not forcibly retain employees' identification, passports, work permits, or deposits as a condition of employment. Suppliers must require the same from any contractor or subcontractor employed to perform work for KPM Petroleum & Logistics (Pty) Ltd.

Healthy and Safe Workplace: A healthy and safe working environment must be provided to all employees. As a minimum, this includes potable drinking water and adequate lighting, temperature, ventilation, and sanitation. All facilities and housing conditions, if provided, must be constructed and maintained in accordance with the standards set by applicable laws and regulations. Contractors and subcontractors of Suppliers, working on KPM Petroleum & Logistics (Pty) Ltd. projects, must employ the same requirements.

Integrity

Anti-bribery and Corruption: KPM Petroleum & Logistics (Pty) Ltd. has zero tolerance for any form of bribery or corruption. Suppliers are expected to comply with applicable anti-bribery and anti-corruption laws and to behave ethically in all business dealings for or on behalf of KPM Petroleum & Logistics (Pty) Ltd.

Improper Payments: Suppliers are prohibited from offering, promising, giving, requesting, or accepting improper payments, e.g., a bribe, a "kickback," or anything of value (including gifts, meals, entertainment, etc.) directly or through a third party in an attempt improperly to gain or retain business or influence a decision. Suppliers should not make payments to government employees to expedite the timing of activities that the government employee is required to perform (e.g., process visas, customs declarations, etc.) except if it is an official express service offered by the relevant government entity.

Gifts and Entertainment: Because gifts and entertainment may be used to disguise bribery and corruption, KPM Petroleum & Logistics (Pty) Ltd. requires that Suppliers only offer or accept gifts or entertainment that are reasonable, directly related to a proper business purpose, and in accordance with local laws governing such activity. Cash or cash equivalents are not permissible. Any offer of a gift or entertainment during an open bidding process in which the Supplier is involved is strictly prohibited.

Supply Chain: Suppliers must carefully scrutinize, select, and monitor the third parties they use who will act for or on behalf of KPM Petroleum & Logistics (Pty) Ltd. and conduct appropriate diligence and background checks, considering the activity, origin, and government interaction of the third party. Third parties, contractors, agents, or subcontractors should be selected based on merit and competitiveness. Suppliers are responsible for ensuring their own third parties comply with this Supplier Code and applicable standards and policies with respect to business conducted for or on behalf of KPM Petroleum & Logistics (Pty) Ltd.

Competition: Suppliers are expected to comply, at a minimum, with the competition laws in the countries where they operate or sell products and services. They must not coordinate market conduct with competitors or their own suppliers in a way that improperly restricts competition. Suppliers also must not discuss internal or material non-public business information, such as prices, discounts, pricing policy, profits, market share, production levels, customers, or sales territories with a competitor, particularly concerning work performed for KPM Petroleum & Logistics (Pty) Ltd. ment obligations under country and industry laws and regulations should be strictly adhered to.

Transparency

Conflicts of Interest: Suppliers must avoid any activity that creates a conflict of interest or the appearance of a conflict of interest that brings into question objectivity or loyalty to KPM Petroleum & Logistics (Pty) Ltd. This includes conflicts of interest that may result from financial interests, employment, time commitments, outside directorships, stock ownership, friends/familial relationships, sponsorships or honorariums, and use of confidential information. Each Supplier acknowledges that it will not use its position to profit personally at the expense of KPM Petroleum & Logistics (Pty) Ltd.

Books and Records: Accurate and transparent books and records should be maintained at all times and demonstrate compliance with applicable laws and regulations. Suppliers must be watchful for and report internally any irregular payments, suspicious transactions, or suspected money laundering within a reasonable timeframe.

Audits and Assessments: Suppliers are expected to cooperate with internal and external investigators and auditors. They must notify KPM Petroleum & Logistics (Pty) Ltd., if allowed, of any investigation, audit, assessment, or unusual request that relates to KPM Petroleum & Logistics (Pty) Ltd. or concerns the work the Supplier is performing on behalf of KPM Petroleum & Logistics (Pty) Ltd.. In addition, KPM Petroleum & Logistics (Pty) Ltd. and its appointed external representatives shall have the right to inspect and audit the books, records and accounts of the Supplier, as well as conduct operational audits, if requested.

Sustainability

KPM Petroleum & Logistics (Pty) Ltd is committed to preserving the environment, complying with all applicable environmental laws and regulations, demonstrating continual improvement in its environmental performance, and following industry practices to do so. Suppliers are obliged to minimize their waste of energy, water, and other resources, prevent discharge that would have an adverse impact on the environment, and recycle whenever possible.

Confidentiality

Confidential Information: Suppliers must safeguard KPM Petroleum & Logistics' confidential and personal data and follow relevant data protection, privacy, and information's security laws and regulations. In doing so, each Supplier agrees only to acquire and seek to acquire confidential information or personal data through proper means. That information must be kept secure and accessible only to those with a legitimate need to access it. Suppliers will not discuss, disclose, transfer, release, or share any confidential information or personal data concerning KPM Petroleum & Logistics (Pty) Ltd or anyone else without written consent from KPM Petroleum & Logistics (Pty) Ltd.

Competitive Information: Suppliers will not seek to obtain or use insider, material, or confidential information that belongs to competitors or other third parties. The Supplier will return any materials mistakenly, or otherwise, received containing such competitive information to the rightful entity.

Accountability

KPM Petroleum & Logistics (Pty) Ltd can fulfill its commitment to integrity and compliance only if its Suppliers share this commitment. KPM Petroleum & Logistics (Pty) Ltd therefore expects all of its Suppliers to be alert to any potential violations of law or the Supplier Code in the context of the Supplier's relationship with KPM Petroleum & Logistics (Pty) Ltd. and to notify the KPM Petroleum & Logistics (Pty) Ltd. Ethics & Compliance Office of any such concerns. Suppliers who represent KPM Petroleum & Logistics (Pty) Ltd. or are effectively working as KPM Petroleum & Logistics (Pty) Ltd personnel must immediately inform the KPM Petroleum & Logistics (Pty) Ltd Ethics & Compliance Office if they are notified by a regulatory authority or other external party of an audit, investigation, lawsuit, or other inquiry regarding KPM Petroleum & Logistics (Pty) Ltd, if not prohibited from doing so.

KPM Petroleum & Logistics (Pty) Ltd requires its Suppliers to cooperate with the KPM Petroleum & Logistics Ethics & Compliance Office in the resolution of any concern, including making relevant documents, information, and employees available when requested and appropriate and by maintaining the confidentiality of any information related to such a request. KPM Petroleum & Logistics (Pty) Ltd strictly prohibits retaliation of any kind against anyone who reports a concern in good faith and requires the same of its Suppliers.

If you have a concern about the conduct of KPM Petroleum & Logistics (Pty) Ltd or a KPM Petroleum & Logistics (Pty) Ltd employee, contractor, representative, or counterparty, you can reach the KPM Petroleum & Logistics Ethics & Compliance Helpline (anonymously or otherwise) at:

E-mail: compliance@kpmpetroleum.co.za
Post: **KPM Petroleum & Logistics Proprietary Limited**
Ethics & Compliance Office
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