



**UCL COMPANY (PTY) LTD**

***COMPANY COMMITMENTS***

v2

**GROUP GUIDELINES**

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**DATE OF IMPLEMENTATION: DATE SIGNED BY CHAIRMAN**

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**GENERAL MANAGER**

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**DATE**

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## **1. Human Resources.**

The UCL Group of Companies is committed to having an employment environment which is supportive and that demonstrates the value the Group places on teamwork and individual contributions. The Group expects all employees to treat their fellow employees with courtesy, dignity and respect that they would like to receive. An integral part of the Group's commitment is that it will not practice or permit discrimination against any person because of race, colour, religion, national origin, sex, sexual orientation, age or disability. The Group is committed to a friendly workplace free of harassment, intimidation and hostility.

The Group is committed to treating all employees fairly. To this end the Group has written grievance and whistleblower procedures and encourages employees to use them if they believe they are required.

The Group wants to be known as the employer of choice in every community in which it operates.

## **2. Health and Safety.**

The Group is committed to having work sites which are healthy and safe. The Group expects all employees to comply with all applicable health and safety regulations, requirements and policies. The health and safety of all employees, and all who come into contact with the Group locations, is paramount. In addition to following all applicable laws and Group safety policies, the Group expects all employees to use common sense in matters involving health and safety.

## **3. Environment.**

The Group is committed to the best possible standards in its environmental practices. The Group will endeavor to meet all legal requirements applicable to our activities. To this end the Group expects its employees:-

- (a) To comply with applicable environmental requirements,
- (b) Seek guidance when unsure of the requirements,
- (c) Consider what additional steps could be taken to enhance the Group's environmental performance, and
- (d) Report violations or suspected violations to the appropriate Group authority.

## **4. Community and Other Stakeholders.**

The Group is committed to maintaining the best possible relationships with the communities in which it operates. The Group's policy is to make positive



contributions to the communities in which it operates, including encouraging the employment of suitably qualified and skilled persons from the local community, and with appropriate financial contributions so that the communities are enriched by the Group's presence. The Group also encourages its staff to participate in community activity.

Our suppliers and customers are crucial to the Group's success and therefore it is committed to maintaining honest and mutually beneficial relationships with its suppliers and customers. The group expects to be treated fairly by its suppliers and customers and in return the Group will do the same to them.

The Group's relationship with Local and National Government is important to its success. Therefore the Group is committed to dealing in an honest and forthright manner with all governmental entities. While the Group will exercise and protect its legal rights, it will also cooperate with all governmental agencies in recognition of its civic duties.

The group recognizes that its employees make it profitable and recognizes the employee's participation, commitment and importance through its commitment to human resources and health and safety.

The Group's shareholder are its most important stake holders, as owners of the Group they have entrusted management with the care of their assets. The Group is committed to managing their assets responsibly and profitably and providing them with timely and complete disclosure.

## **5. Ethical Conduct and Compliance with the Law.**

The Group is committed to conduct business in an ethical way and in compliance with applicable laws and regulations. As part of the commitment, the Board has established a Corporate Code of Conduct and Ethics. The code contains some specific provisions dealing with such matters as corporate opportunity, conflicts of interest and securities trading. It also deals with more general matters, such as compliance with law and honesty and fair dealing. The Group strives to operate in an ethical and legal way in all its activities, and we expect our employees to do the same. The code cannot cover everything and for that reason when a Director or employee is confronted with a situation not covered by the code the Group expects that person to ask themselves two questions before proceeding;

- (1) Is it right; and
- (2) How would I feel if my actions were the subject of a front-page news report?

