

Code of Conduct

Batho Pele Group (Pty) Ltd

Policy	Code of Conduct
Reference	BPG-POL-03
Version	1.0
Approved by	Board of Directors, October 2026
Policy owner	Compliance Officer (Director: Duane P. B. Webber)
Applies to	All directors, employees, contractors, agents, intermediaries and consortium partners acting for or on behalf of Batho Pele Group (Pty) Ltd
Review	Annually, or sooner on a material change in law or business

1. Our values

“Batho Pele” means “People First”. We serve customers, partners and communities with integrity, accountability and respect, and we comply with the law wherever we do business. This Code sets out the standards expected of everyone who acts for the Company.

2. Compliance with law

We comply with the laws of South Africa and of every country in which we trade, including petroleum licensing, customs, tax, competition, anti-corruption, anti-money laundering, sanctions, environmental and health and safety laws. Where this Code is stricter than local law, this Code applies.

3. Integrity in business dealings

- We compete fairly and do not engage in price-fixing, market allocation, collusive tendering or other conduct prohibited by the Competition Act 89 of 1998 or equivalent laws.
- We give accurate information about products, specifications, quantities, origin and our capabilities, and we do not make commitments we cannot meet.
- We do not offer or accept bribes or improper benefits (see the Anti-Bribery and Corruption Policy).
- We know our counterparties and screen them (see the AML/CFT and Sanctions Policy).

4. Conflicts of interest

Directors, employees and agents must avoid situations where personal interests conflict, or appear to conflict, with the Company's interests. Any personal or family interest in a supplier, customer, intermediary or competitor must be disclosed in writing to the Board before any related decision. Directors comply with section 75 of the Companies Act 71 of 2008 on disclosure of personal financial interests.

5. Product quality, safety and environment

Products are supplied to the contracted specification and verified by independent inspection. We work only with vessels, terminals and transporters that meet applicable safety, MARPOL and environmental standards, and we report any spill, incident or near-miss immediately.

6. Confidentiality and data protection

Commercial, pricing and counterparty information is confidential and may be shared only on a need-to-know basis or under a signed non-disclosure agreement. Personal information is processed in line with the Protection of Personal Information Act 4 of 2013 (POPIA).

7. Accurate records and reporting

All books, invoices, contracts and shipping documents must be complete, accurate and supported. Falsifying or altering any record, including certificates of quality, origin or quantity, is prohibited.

8. People and human rights

We treat people with dignity, do not tolerate discrimination, harassment, forced or child labour, and expect our suppliers and partners to meet the same standards.

9. Use of Company assets and communications

Company funds, systems and information are used only for legitimate business purposes. Banking details may be changed only on signed letterhead verified by telephone call-back to a known number.

10. Speaking up

Anyone who suspects a breach of this Code must report it to the Compliance Officer or, where the concern involves the Compliance Officer, to the Chairman. Reports may be made confidentially. Retaliation against anyone who reports in good faith is prohibited.

11. Acknowledgement and breach

Every director, employee, agent and partner must read and acknowledge this Code. Breaches are dealt with under the Company's disciplinary procedures and may lead to dismissal or termination of contract.

Approval

Adopted by the Board of Directors of Batho Pele Group (Pty) Ltd, October 2026. Signed copy held by the Company.