



CORPORATE POLICY

NO: CP011
REV: 03
DATE: 08/10/2025
PAGE 1 of 3

SUBJECT:

BUSINESS ETHICS POLICY

PURPOSE

This policy aims to provide a high level framework to guide employees, contractors and relevant stakeholders in upholding the sustainability of the Richards Bay Coal Terminal ("RBCT"), and to ensure that the behavior of employees and contractors is guided by this policy. The purpose of this Business Ethics Policy is to establish a culture of honesty, integrity, and accountability within RBCT. All RBCT employees, contractors, and other stakeholders are expected to uphold the highest ethical standards in all business activities.

SCOPE

This policy applies to all employees, contractors, other RBCT stakeholders, and/or any third parties acting on behalf of RBCT.

DEFINITIONS

- **Ethics:** moral principles that govern a person's behaviour or the conducting of an activity/business.

STATEMENT AND COMMITMENTS

RBCT is committed to ethical standards and sound corporate governance principles. Our philosophy is aligned with RBCT values and company vision, and is driven by a joint commitment towards transformation, continuous improvement, development and prosperity of RBCT, its shareholders and stakeholders. RBCT is committed to ensuring that all the organization's dealings with employees, contractors, general public and other relevant stakeholders are ethical.

RBCT Management is committed to leading the organization in a manner that creates an environment and workplace culture grounded in integrity, professionalism, accountability, transparency and compliance, while eradicating corruption and other economic crimes.

RBCT Management is committed to the following ethical standards:

- **Conflict of interest:** Avoidance of any situation that could create a conflict between personal interests and company interests.



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PAGE 2 of 3

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- **Confidentiality and data protection:** Protecting the confidentiality of company information, and ensuring non-disclosure of information without proper authorization.
- **Fair business practices:** RBCT promotes fair and ethical competition.
- **Anti-bribery and corruption:** RBCT has zero-tolerance for bribery, corruption, or unethical persuasions.
- **Compliance with legislation:** RBCT is committed to comply with all applicable laws and regulations.
- **Workplace conduct and culture:** A professional and respectful workplace is essential to RBCT's corporate success.
- **Use of company resources:** Company resources, must be used responsibly and solely for legitimate business purposes.
- **Reporting and addressing misconduct:** RBCT stakeholders are encouraged to report any unethical, illegal, or suspicious activities without fear of retaliation.

RESPONSIBILITIES

Management, under the guidance of the Board of Directors, will ensure that it does not become complacent in upholding ethical conduct at RBCT. The Executive Management will review and update this policy regularly. Furthermore, RBCT Management will ensure that all persons to whom this policy is applicable are made aware of the policy through various initiatives of awareness, training and publication thereof.

ENFORCEMENT AND REVIEW OF POLICY

Consistent compliance with this policy is essential to its effectiveness. This policy will be reviewed after 3 years, or when business process relevant to the Business Ethics programme change, and as and when required.



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PAGE 3 of 3

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03	08/10/2025	Phindi Mjadu RISK SPECIALIST	Zanele Mthiyane GM - HSEC	Alan Waller CEO	General review
02	13/06/2023	Phindi Mjadu RISK SPECIALIST	Zanele Mthiyane GM - HSEC	Alan Waller CEO	General review
01	30/07/2019	Phindi Mjadu RISK OFFICER	Zanele Mthiyane GM - HSEC	Alan Waller CEO	Revised the following: • Policy name change from Integrated Business Policy to Business Ethics Policy • Separated document to policy and procedure.
00	22/02/2013	Gracia Skosana	Alan Waller	Nosipho Damasane	Original
Rev.no.	Rev. Date	<u>Name / signature</u> Prepared by	<u>Name / signature</u> Reviewed by	<u>Name / signature</u> Approved by	Revision summary