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PURPOSE OF THE FRAMEWORK

The purpose of the SEDIBENG IRON ORE Supplier Code of Conduct Framework is to reinforce our commitment to building durable and sustainable relationships with our Suppliers and formalise the commitments that we require from our Suppliers.

SEDIBENG IRON ORE understands that suppliers are independent entities, but the business practices and actions of a supplier may significantly impact and/or reflect upon SEDIBENG IRON ORE, our reputation, and our brands. Because of this, SEDIBENG IRON ORE expects all suppliers and their employees, agents, and subcontractors (their representation) to adhere to the SEDIBENG IRON ORE supplier code of conduct while they are conducting business with SEDIBENG IRON ORE . All suppliers should educate their representatives to ensure that they understand and comply with the Code.

SUPPLIER GUIDING PRINCIPLES

We expect our supplier to introduce suitable processes within their organisation that support compliance with applicable statutes and that drive continuous improvements regarding the principles and requirements laid out in these Principles. Our goal is to work with our suppliers to ensure full compliance with these Principles, as they in turn apply them to their own suppliers with whom they work to deliver goods and services for SEDIBENG



IRON ORE. We require Suppliers to share our commitment to and compliance with the following minimum guiding principles:

COMPETITION LAW

Competition laws ensure that companies compete to acquire business by offering best prices, innovative products, and better service and not by interfering with the market forces of supply and demand. SEDIBENG IRON ORE requires that all suppliers conduct their business in full compliance with all applicable laws intended to promote free and fair competition and do not enter into prohibited agreements or practices, formal or informal, such as price fixing, market sharing bid rigging, collusion, and “kickbacks”.

DATA PRIVACY AND SECURITY

SEDIBENG IRON ORE requires its suppliers to protect the privacy of individuals and the security of confidential assets and information.

- ***Confidential assets and information***

Suppliers must protect SEDIBENG IRON ORE 's confidential assets and information. Suppliers must design and maintain processes to provide appropriate protections for this information.

- ***Personal information and privacy***

SEDIBENG IRON ORE requires Suppliers to protect personal information in compliance with all applicable local laws. Personal information provided by or on behalf of SEDIBENG IRON ORE should only be used, accessed, and disclosed as permitted by the Supplier agreement.

ETHICAL DEALING

SEDIBENG IRON ORE seeks to deal with Suppliers that are honest and ethical and will give all potential suppliers fair consideration. Decisions will be based on objective criteria such as price, BBBEE status, technical criteria, service capability, reliability, and integrity.

The giving or receiving any kickbacks, bribes or similar payments of any sort is prohibited. SEDIBENG IRON ORE employees may not receive any commissions, money, or item of value other than regular remuneration and incentives as provided in their terms of employment, either directly or indirectly, for negotiating, procuring, recommending, or aiding in any transaction entered on behalf of SEDIBENG IRON ORE , nor are they entitled to any direct or indirect financial interest in such transactions.

SEDIBENG IRON ORE employees are prohibited from engaging in any private financial relationship with any Supplier, its owners, shareholders, directors, partners, or members including the investment in or acquisition of any financial interest for their own account in any Supplier business, or with any of the owners, shareholders, directors, partners, or members of such business, other than ordinary share dealings through a recognised stock exchange.

Suppliers are required to demonstrate the same high ethical standards and to conduct business with integrity and fairness.



ENVIRONMENT

All SEDIBENG IRON ORE shall comply with all applicable environmental laws and regulations. All Suppliers shall ensure that their actions are conducted in an environmentally responsible way and be transparent about and accountable for environmental performance.

HEALTH AND SAFETY

Suppliers who have commercial engagements with SEDIBENG IRON ORE are required to provide a healthy and safe work environment for all its employees

In addition, any supplier employee or representative providing on-site services at SEDIBENG IRON ORE Mine site, are required to the required safety standards and site rules.

INTERNATIONAL TRADE REGULATIONS

SEDIBENG IRON ORE expects its suppliers to adhere to all applicable trade and import regulations that apply to their activities, when they acquire goods from an International entity.

LABOUR PRACTICES AND HUMAN RIGHTS

SEDIBENG IRON ORE is committed to fair labour practices in the workplace and expects its suppliers to take appropriate steps to ensure that they and their suppliers subscribe to the same principles and practices which include:

- (i) The provision of equal opportunities without discrimination based on age, colour, creed, disability ethnic origin, disability, ethnic origin, gender, marital or family status, religion, or sexual orientation. In addition, all promotions and recognition will be based on pure merit.
- (ii) The recognition of the right of employees to freedom of association, organisation, and collective bargaining
- (iii) A Prohibition of all forms of unfair discrimination
- (iv) A Prohibition of use of child labour
- (v) An intolerance of the inhumane treatment of employees and behaviour linked to any form of harassment in the workplace
- (vi) Respect for the privacy of the employee

MONEY LAUNDERING, BRIBERY AND CORRUPTION

SEDIBENG IRON ORE is committed to doing business ethically and has a zero tolerance towards money laundering, bribery and corruption. Any practices of criminal activity and non-adherence to applicable national or international anti-bribery and corruption laws are prohibited.

1. **Anti-Bribery.** Company policy and anti-bribery laws around the world prohibit SEDIBENG IRON ORE and its employees from giving or accepting money or other inappropriate enticements, directly or indirectly to coerce or persuade the awarding of a business opportunity to SEDIBENG IRON ORE or the Supplier, as the case may be.



2. **Anti-Money Laundering.** SEDIBENG IRON ORE and the Supplier shall at all times comply with all applicable anti-money laundering laws and regulations, including without limitation the Financial Intelligence Centre Act 38/2001 (as amended). SEDIBENG IRON ORE and the supplier will implement anti-money laundering compliance tools to prevent money laundering.
3. **Corruption.** SEDIBENG IRON ORE expects its suppliers and their indirect suppliers to adhere to the highest standard of moral and ethical conduct, and to comply with all laws and regulations as they relate to fair business practices. Suppliers are expected to ensure that their employees, subcontractors and agent do not engage in any form of corrupt practices, such as fraud, bribery, or extortion with the goal of securing an order award or any other form of preferential treatment in their business transactions.
4. **Conflict of Interest.** Suppliers are expected to disclose to SEDIBENG IRON ORE :
 - (i) any situation that may appear as a conflict of interest; and
 - (ii) any SEDIBENG IRON ORE employee or other professional under contract with SEDIBENG IRON ORE who may have an interest of any kind in the supplier's business or any kind of economic ties with the supplier.
5. **Gifts and Entertainment.** Supplier may not provide gifts, hospitality, or favors to any SEDIBENG IRON ORE employee, their family members, or friends other than the following:
 - (i) Promotional material.
 - (ii) Gifts or entertainment not more than R500; or
 - (iii) Product and partner knowledge sessions, conferences, and events, if travel, accommodation, and subsistence is paid for by SEDIBENG IRON ORE

Suppliers may not offer any gift, entertainment or hospitality that could lead to any of the following

- (i) Affect either party's impartiality.
- (ii) Influence a business decision; or
- (iii) Lead to the improper performance of an official duty.

QUALITY

Suppliers are expected to provide goods and services that consistently meet required specifications or at industry standard. SEDIBENG IRON ORE will only do business with suppliers that produce, package, store, and ship products in accordance with good manufacturing practices prevailing in their specific industries.

SUSTAINABILITY

SEDIBENG IRON ORE is committed to the principle of sustainable development, which is striking an optimal balance between economic, environmental, and social development. SEDIBENG IRON ORE also recognizes the need for sustainability to:

- (i) Minimize the impact of operations on the environment;
- (ii) Minimize consumption of natural resources and waste generation;
- (iii) Maximize recycling where possible;

SEDIBENG IRON ORE requires its Suppliers to share the same commitment to sustainability.



TRANSFORMATION

SEDIBENG IRON ORE is committed to enterprise and supplier development and requires its Suppliers to share the same commitment to transformation