

	Integrated Management System	Approval	
		Managing Director	
	CODE OF ETHICS	Document No.: BUS-ST-02	
		Date Established: 28/09/2019	
		Review Date: -	Rev: 01

1. OBJECTIVE AND SCOPE

The objective of the Bidvest Tank Terminals (BTT) Code of Ethics is to ensure all business practices are in support of the company's values, namely; customer service, respect and empowerment, excellence, safety and sustainability, and teamwork, thereby ensuring a stable employment environment and the on-going success of BTT.

This Code is applicable to the entire business and all its activities.

2. ROLES AND RESPONSIBILITIES

- **Managing Director**
To review and approve the Code of Ethics

- **Directors / Managers**
To ensure the Code of Ethics is implemented and compiled with

- **All Employees**
To comply with the Code of Ethics

3. KEY DEFINITIONS

BTT – Island View Storage (Pty) Ltd trading as Bidvest Tank Terminals

Code – refers to the BTT Code of Ethics

Ethics – a system of moral principles; the rules of conduct recognised in respect to a particular class of human actions or a particular group, culture, etc.

Relatives – an employee's close family members, including but not limited to siblings, children, parents, nieces, nephews, aunts, uncles, cousins and spouse or life partner

4. REQUIREMENTS

4.1 General

4.1.1 BTT believes in empowering people, building positive relationships, decentralised management and communication.

4.1.2 BTT subscribes to a philosophy of transparency, accountability, integrity, excellence and innovation in all our business dealings. This means we adhere to the following:

Transparency	The quality of being clear, honest and understood
Accountability	The state of being responsible, liable and answerable
Integrity	Uncompromising adherence to moral and ethical principles
Excellence	The quality of distinction; possessing good qualities in high degree
Respect	To hold in esteem, in honour

Innovation	Introduction of new and original things, methods and ideas
Honesty	Uprightness; trustworthiness, truthfulness, sincerity, freedom from deceit and fraud

- 4.1.3 Compliance with the Code is compulsory at all levels of the organisation.
- 4.1.4 As evidence of BTT's commitment to the Code, a free and anonymous 'Fraud & Ethics' line is available to all Bidvest stakeholders. With the support of all, we aim to encourage an open and transparent workplace, promoting a culture of reporting wrongdoing. The toll- free number is 0800-506090 (All approaches to this line will remain confidential).
- 4.1.5 BTT Directors and management are committed to being role models of the Code.
- 4.1.6 All employees shall measure their behaviour in terms of the spirit of the Code, as well as against the practical guidelines on ethical behaviour, refer below.

4.2 Guidelines on Ethical Behaviour

4.2.1 Conflicts of interest

- 4.2.1.1 Employees have different responsibilities towards their employer and communities. Without negating other responsibilities, employees are expected to look after the interests of BTT and conflicts (real or perceived) should therefore be avoided or managed properly.

4.2.2 Having a second job

- 4.2.2.1 It is not possible to have a second job that would have a negative impact on the ability of the employee to serve the interests of BTT.

4.2.3 Interests in suppliers or customers

- 4.2.3.1 Any interest (direct or indirect) in a supplier or customer of BTT would constitute an unacceptable conflict of interest and should be avoided altogether.

4.2.4 Affected parties

- 4.2.4.1 Relatives are also affected by the Code and are not allowed to work for, or to have an interest in a customer or supplier without disclosure to a manager.

4.2.5 Disclosure

- 4.2.5.1 All existing, potential or perceived conflicts of interests should be disclosed to management. Based upon full disclosure, a decision will be made how to manage the situation on a case-by-case basis.

4.2.6 Business courtesies

- 4.2.6.1 Giving or accepting business courtesies is accepted within the South African business environment, provided that such courtesies are not excessive and are not given or received in order to unduly influence a business decision. Management will maintain a gift register, and all courtesies (offered or received) valued at R2 500 or more will be recorded.

4.2.7 Kickbacks and bribes

4.2.7.1 No kickbacks or bribes may be accepted or given. If they are offered to an employee, it should be reported immediately to management, who will decide what further action might be required.

4.2.8 Cyber liabilities

4.2.8.1 Access to facilities such as e-mail and Internet should not be abused. As far as possible, employees should avoid using e-mail for sending or receiving personal messages (especially if they contain large attachments) or junk mail. Sending or receiving chain mail is prohibited. No employee should access or distribute any material that could offend others (e.g. pornographic material or material that could incite racial hatred). Any involvement in activities such as computer hacking and wilful virus transmission is prohibited.

4.2.9 Expense accounts

4.2.9.1 All expense accounts submitted should be an accurate reflection of actual expenses incurred on behalf of BTT and should be supported by the original documentation.

4.10 Divulging trade secrets

4.10.1 All company proprietary information shall be protected and may not be disclosed to third parties.

4.11 Competitor relations

4.11.1 Within the competitive environment of a market economy, BTT appreciates the opportunity to compete fairly and responsibly. BTT will not attempt to access any confidential competitor information, nor will it engage in any activities that would constitute or could be perceived as collusion or price-fixing.

4.12 Privacy

4.12.1 BTT respects the rights of individual to privacy. Any activities that could be perceived as an invasion of privacy (e.g. monitoring of e-mails, telephone calls, internet usage) can be fully disclosed by BTT, and will include a sound business motivation for such action

4.13 Private use of company assets

4.13.1 Private use of company assets is prohibited with the exception of company issued mobile devices referred to in the Mobile Device Usage & Management Standard (IST-ST-02). All employees shall be aware that such assets are used, first and foremost, to achieve BTT's objectives.

4.14 Copyright infringement

4.14.1 The infringement of copyright is illegal and will not be tolerated. In particular, any software that is used on BTT's computer equipment will be properly licensed.

4.15 Discrimination

Discrimination based on race, gender, sex, pregnancy, marital status, family responsibility, ethnic or social origin, colour, sexual orientation, age, disability, religion, HIV status, conscience, belief, political opinion, culture, language, birth is illegal and will not be tolerated. Any employee that experiences any kind of discrimination should report this immediately.

4.16 Sexual Harassment

4.16.1 Any unwanted conduct of a sexual nature is totally unacceptable and will not be tolerated. Any employee who experiences sexual harassment should report this immediately.

4.17 Work / life balance

4.17.1 BTT acknowledges the needs of employees to fulfil responsibilities and commitments other than those to BTT, and encourages all employees to maintain a healthy balance between their personal and professional lives.

4.18 Sustainability

4.18.1 BTT is committed to the natural environment and also to be a responsible corporate citizen.

4.19 Political contributions

4.19.1 No political contributions (either monetary or in-kind) will be made by BTT.

4.20 Whistle-blowing

4.20.1 The Protected Disclosures Act ensures that those individuals who speak up against unethical or illegal behaviour will be protected. BTT encourages employees to make such disclosures, and for this purpose has created a confidential toll-free telephone number.

5. REFERENCES

- IST-ST-02 : Mobile Device Usage & Management Standard
- IMS-TECH-MAN-01 : Integrated Management System Manual, Section 5.1 & 8.1
- Legal References : Protected Disclosures Act, 2000 (Act No. 20 of 2000) as amended
: The Employment Equity Act, No 55 of 1998 as amended

6. REVISION HISTORY

MOC #	Description of Change	Prepared by	Date
968	Replaces the Business Integrity Standard	T.Ridhoo	28/09/2019